	Case 4:13-md-02420-YGR Document 1810	Filed 05/26/17 Page 1 of 460
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Steve W. Berman (<i>Pro Hac Vice</i>) HAGENS BERMAN SOBOL SHAPIRO LLP 715 Hearst Avenue, Suite 202 Berkeley, CA 94710 Telephone: (510) 725-3000 Facsimile: (510) 725-3001 steve@hbsslaw.com Elizabeth J. Cabraser (083151) LIEFF CABRASER HEIMANN & BERNSTEIN, 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 Telephone: (415) 956-1000 Facsimile: (415) 956-1008 ecabraser@lchb.com Steven N. Williams (175489) COTCHETT, PITRE & McCARTHY, LLP 840 Malcolm Road Burlingame, CA 94010 Telephone: (650) 697-6000 Facsimile: (650) 697-0577 swilliams@cpmlegal.com <i>Indirect Purchaser Plaintiffs Interim Co-Lead Class Counsel</i> [Additional Counsel Listed on Signature Page]	LLP
16	UNITED STATES I	DISTRICT COURT
17	NORTHERN DISTRIC	CT OF CALIFORNIA
18	OAKLAND	DIVISION
19	IN RE LITHIUM ION BATTERIES ANTITRUST LITIGATION,	Case No. 13-MD-02420 YGR (DMR)
20		MDL No. 2420
21		
22	This Documents Relates to:	DECLARATION OF STEVE W. BERMAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION
23	ALL INDIRECT PURCHASER ACTIONS	FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARDS
24		Date: August 1, 2017
25		Time: 2:00 p.m. Dept: Courtroom 1, 4th Floor
26		Judge: Hon. Yvonne Gonzalez Rogers
27		DATE ACTION FILED: Oct. 3, 2012
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I, STEVE W. BERMAN, declare as follows:

 I am an attorney duly licensed to practice before all of the courts of the State of Washington in the above-titled litigation. I am the managing partner of Hagens Berman Sobol Shapiro LLP, co-lead counsel for the indirect purchaser plaintiffs in the above-titled action. Based on personal knowledge or discussions with counsel in my firm of the matters stated herein, if called upon, I could and would competently testify thereto.

2. During the pendency of this litigation, Hagens Berman has served as co-lead counsel to the indirect purchaser class. The details of the work performed by the co-lead firms is described in the Joint Declaration of Steven Williams, Steve Berman, and Elizabeth Cabraser in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. Below I provide a summary of the time invested by Hagens Berman and detail of the team of attorneys and staff who have worked on this litigation to date.

3. Hagens Berman has prosecuted this litigation on a contingent basis without any promise of compensation. This poses a significant risk that my firm will not be compensated for its work on this case. Moreover, while attorneys and staff at Hagens Berman devoted time to this litigation, we have foregone other legal work for which we would have been compensated.

I. SUMMARY OF HAGENS BERMAN'S LODESTAR

1. Hagens Berman's total lodestar from June 1, 2013 to February 28, 2017, is \$7,257,742.00. During this period, professionals at Hagens Berman devoted 20,520.60 hours in total to this litigation. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198). Hagens Berman's lodestar is calculated based on the current hourly rates of the firm. These hourly rates are based on regular and ongoing monitoring of prevailing market rates in the San Francisco Bay Area for attorneys of comparable skill, experience and qualifications.

25 2. Detailed and contemporaneously prepared time records supporting this summary are
26 attached as <u>Exhibit 1</u> to this declaration. These time records have been audited by a partner at my
27 law firm, as is our standard practice in cases. The audit included the removal of time which did
28 not conform with this Court's guidelines in the case, the removal of duplicative time, and the
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removal of timekeepers with only a small amount of time billed to this case. In addition, these time records have been reviewed and redacted at the direction of a partner at my firm. Hagens Berman has narrowly redacted certain time entries to remove core attorney work product and the details of attorney-client communications, as well as to respect other privileges. For example, Hagens Berman has redacted: (i) time entries that would reveal the parties and timing of settlement discussions and mediations; (ii) specific communications with clients that are protected by the attorney-client privilege; and (iii) core attorney-work product, including entries which reveal the strategy of attorneys, topics of legal research, document review strategies, and other entries which would provide insight into IPPs' preparation for class certification, motions for summary judgment and trial. This last category is particularly sensitive, given that IPPs continue to prosecute claims against the Panasonic, Sanyo, SDI, and Toshiba defendant families.

3. A summary of the timekeepers who have worked on this litigation, the number of hours dedicated to certain tasks in this litigation, their total hours, their current hourly billing rates, and their total lodestar based on current billing rates is attached as **Exhibit 2**.

4. A summary of the timekeepers who have worked on this litigation, the number of hours dedicated to certain tasks in this litigation, their total hours, their historic billing rates, and their total lodestar based on historic billing rates is attached as **Exhibit 3**.

5. A summary of the costs and expenses that Hagens Berman has paid to date in this litigation is attached as **Exhibit 4**. These costs and expenses are based on the books and records of my firm. Class counsel has decided not to request reimbursement of all of these expenses at this time. The expenses reflected in Exhibit 4 are prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

6. I have reviewed the time and expenses reported by Hagens Berman in this case which are included in this declaration and its exhibits, and I affirm that they are true and accurate.

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7. The expertise and experience of lead counsel is another important factor in setting a fair fee. As demonstrated by our firm résumé, attached hereto as **Exhibit 5**, Hagens Berman is

THE BATTERIES LITIGATION

EXPERTISE AND EXPERIENCE OF CORE TEAM MEMBERS WORKING ON

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among the most experienced and skilled practitioners in the complex litigation field, and has a long and successful track record in such cases. Hagens Berman is a nationally recognized law firm, with offices in Berkeley, Seattle, Boston, Chicago, Los Angeles, Washington D.C. and Phoenix. We have been consistently rated by the National Law Journal in the top ten of plaintiffs' firms in the country. The firm has extensive experience litigating complex class actions asserting claims of securities, investment fraud, product liability, tort, antitrust, consumer fraud, employment, environmental, and ERISA cases. Moreover, the fact that Hagens Berman has demonstrated a willingness and ability to prosecute complex cases such as this was undoubtedly a factor that encouraged defendants to engage in settlement discussions, and added valuable leverage in the negotiations, ultimately resulting in the recovery for the Class.

8. In addition to biographies included in the attached firm résumé, below is a summary of the experience of the core team members:

13 Steve Berman, one of the founding partners of Hagens Berman, is widely regarded as one of 14 the most effective class action attorneys in the country. He served as lead counsel for 13 states in 15 the tobacco litigation, leading to a settlement of \$206 billion – the largest in history. He, along with 16 Marc Seltzer, was appointed *sua sponte* by Judge James V. Selna of the Central District of 17 California to serve as co-lead counsel in In re Toyota Motor Corp. Unintended Acceleration. The 18 \$1.6 billion settlement was then the largest auto settlement, both in terms of class members and 19 recovery, in U.S. history. He was also instrumental in reaching a landmark \$208 million settlement 20 for student athletes to remedy the NCAA's anticompetitive refusal to allow member institutions to provide student athletes with the full cost of attendance.¹ In comparable litigation, a student athlete 21 22 class received only injunctive relief for the NCAA's anticompetitive refusal to provide compensation for the student athletes' likenesses.² He has served as lead or co-lead counsel in 23 24 antitrust, securities, consumer, and products liability litigation, as well as other complex litigation, 25 including MDL actions, throughout the country. In addition, Mr. Berman was recently appointed to 26 ¹ Notice of Motion and Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action

- ¹ Notice of Motion and Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, *In re Nat'l Collegiate Athletic Ass'n Athletic Grant-in-Aid Cap Antitrust Litig.*, No. 14md-2541 CW (N.D. Cal. Feb. 3, 2017), ECF No. 560.
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² O'Bannon v. Nat'l Collegiate Athletic Ass'n, 802 F.3d 1049, 1079 (9th Cir. 2015).

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the plaintiffs' steering committee by Judge Breyer in the *In re Volkswagen "Clean Diesel" Mktg., Sales Practices, and Prods. Liability Litig.*, No. 15-md-02672-CRB (N.D. Cal.) and lead counsel
for the franchise VW dealers who settled for \$1.2 billion. Mr. Berman graduated from the
University of Chicago Law School in 1980.

5 9. Jeff Friedman is a partner with Hagens Berman and a former Assistant United 6 States Attorney (AUSA), Criminal Division, for the United States Attorney's Office, Central 7 District of California. As an AUSA, Mr. Friedman tried numerous jury trials and prosecuted 8 complex white collar fraud cases and large narcotics organizations. Mr. Friedman's experience as 9 lead or co-lead counsel includes: In re Electronic Books Antitrust Litig., No. 11-md-02293 10 (S.D.N.Y.); In re Optical Disk Drive Antitrust Litig., No. 10-md-02143 (N.D. Cal.); Edwards v. 11 Nat'l Milk Producers Fed'n, No. 11-cv-04766 (N.D. Cal.); In re Nat'l Collegiate Athletic Ass'n 12 Athletic Grant-In-Aid Cap Antitrust Litig., No. 14-md-2541-CW (N.D. Cal.); and In re Animation 13 Workers Antitrust Litig., No. 14-CV-04062-LHK (N.D. Cal.). He was involved in reaching a 14 landmark \$208 million settlement for student athletes to remedy the NCAA's anticompetitive 15 refusal to allow member institutions to provide student athletes with the full cost of attendance in 16 In re Nat'l Collegiate Athletic Ass'n Athletic Grant-in-Aid Cap Antitrust Litig., No. 14-md-2541 17 CW. Mr. Friedman has also been extensively involved in the firm's representation of government 18 entities, successfully recovering hundreds of millions of dollars for these cash-strapped entities. A 19 series of cases include representing government entities (including local California government 20 entities) seeking to recover monies wrongfully paid due to a scheme perpetrated by McKesson 21 Corporation. These cases include San Francisco Health Plan v. McKesson Corp., No. 08-cv-22 10843 (D. Mass.); Utah v. McKesson Corp., No. 10-cv-04743 (N.D. Cal.); Virginia v. McKesson 23 Corp., No. 11-cv-02782 (N.D. Cal.); and Oregon v. McKesson Corp., No. 11-cv-05384 (N.D. 24 Cal.). Mr. Friedman graduated from Santa Clara University School of Law in 1994. 10. Shana Scarlett is a partner with Hagens Berman with extensive expertise in antitrust

Shana Scarlett is a partner with Hagens Berman with extensive expertise in antitrust
 class actions. Ms. Scarlett was a member of the team at Hagens Berman who worked with the
 State Attorneys General in 33 states prosecuting the claims of class members in *In re Electronic Books Antitrust Litig.*, No. 11-mc-02293 (S.D.N.Y.). Settlements in the *Ebooks* litigation resulted
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in \$566 million in recovery – more than double the estimated damages to consumers, believed to be one of the most successful pieces of antitrust litigation in the country. Ms. Scarlett is a member of the litigation team in the *In re Optical Disk Drive Antitrust Litig.*, No. 3:10-md-2143 RS (N.D. Cal.), a case where Hagens Berman acts as sole lead counsel on behalf of the indirect purchaser class. Ms. Scarlett has argued many of the discovery motions in this MDL, and has been the lead questioning attorney in 24 of the depositions of defense witnesses involved in the cartel. Ms. Scarlett was also a member of the *Animation Workers* litigation team, and was a key member of the *Pecover v. Electronic Arts, Inc.* litigation team, where Hagens Berman represented indirect purchasers against the video game company before Judge Walker (Ret.). Ms. Scarlett was instrumental in the certification of a nationwide class of indirect purchasers under California law.³ Ms. Scarlett has been selected as a Super Lawyer in the antitrust bar for each year of 2013 through 2016, and as a Rising Star in 2009 through 2011. Ms. Scarlett graduated from Stanford Law School in 2001.

14 11. *Christopher O'Hara* is a partner with Hagens Berman with a long history in 15 working on antitrust class actions and settlements. Mr. O'Hara plays a key role in working with 16 and overseeing notice and claims administrators on the firm's class settlements and class notice 17 programs, including antitrust actions such as In re Electronic Books Antitrust Litig., No. 11-mc-18 02293 (S.D.N.Y.); In re Optical Disk Drive Antitrust Litig., No. 10-md-2143 RS (N.D. Cal.); and 19 In re Animation Workers Antitrust Litig., No. 14-CV-04062-LHK (N.D. Cal.). An active member 20 of the firm's Microsoft defense team, Mr. O'Hara has spent the past 17 years working for and 21 advising Microsoft in 20 state antitrust class action lawsuits and settlements around the country. 22 Mr. O'Hara began his career with the firm as a Special Assistant Attorney General for 13 states, 23 working on consumer protection and antitrust claims in the landmark State Tobacco Litigation, 24 which resulted in the \$206 billion Tobacco Master Settlement Agreement, the largest settlement in 25 world history. Named a Rising Star in 2003, Mr. O'Hara graduated from Seattle University School 26 of Law, cum laude, in 1993.

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³ See Pecover v. Elec. Arts Inc., No. 08-cv-02820 CW, 2010 U.S. Dist. LEXIS 140632 (N.D. Cal. Dec. 21, 2010).

12. *Ronnie Spiegel* is a partner with Hagens Berman with extensive expertise in antitrust class actions and foreign language discovery. Ms. Spiegel has worked as a key member of the litigation and trial teams in a number of successful cases in the Northern District of California, including *In re Dynamic Random Access Memory (DRAM) Antitrust Litig.*, No. 02-md-01486-PHJ (N.D. Cal.); *In re Static Random Access Memory (SRAM) Antitrust Litig.*, No. 07-md-01819-CW (N.D. Cal.); *In re TFT Flat Panel (LCD) Antitrust Litig.*, No. 07-md-01827-SI (N.D. Cal.); and *In re Cathode Ray Tube (CRT) Antitrust Litig.*, No. 07-cv-05944-SC (N.D. Cal.). She has particular expertise in managing large-scale foreign discovery and foreign language review teams, as well as in managing document translation and the translation objection process. Ms. Spiegel is also a key member of the litigation team for *In re Automotive Parts Antitrust Litigation*, which is comprised of over 40 separate antitrust actions and has generated nearly \$1billion in collective settlements for the end-payor plaintiff classes to date. Ms. Spiegel graduated from Temple University's Beasley School of Law in 1994, where she was a member of the Temple Law Review, and Temple Law Review editorial board.

13. *Ivy Arai Tabbara* is a partner with Hagens Berman with broad range of expertise in complex class actions, including antitrust. She is currently involved in the *Domestic Drywall Antitrust Litigation*, representing purchasers of drywall who allege that drywall manufacturers illegally conspired to inflate the price of drywall in violation of the antitrust laws. Ms. Tabbara was also a key member of the firm's team involved in *Baby Products Antitrust Litig.*, in which the firm secured a settlement of \$35 million. Ms. Tabbara also helped the firm's efforts in *DRAM Antitrust Litig.*. In addition to antitrust cases, Ms. Tabbara was also involved in the firm's intellectual property practice, where she represented inventors whose patents have been infringed by others. And she is presently working on *In re Checking Account Overdraft* cases pending against many of the country's largest banks. Ms. Tabbara is a 2000 graduate of Georgetown University Law Center, and Princeton University.

14. *Jerrod Patterson* is Of Counsel at Hagens Berman. Mr. Patterson previously served
 as a federal prosecutor for nine years, and has extensive experience in trying complex fraud and
 tax cases to verdict. Mr. Patterson specializes in antitrust cases, and is currently part of a team of
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attorneys representing the Indirect Purchaser Plaintiffs in the *In re Optical Disk Drive Antitrust Litig.*, 10-md-2143-RS (N.D. Cal.) class action case. He also assisted in representing plaintiffs in *In re Animation Workers Antitrust Litig.*, No. 14-CV-04062-LHK (N.D. Cal.), which resulted in a settlement by all defendants totaling over \$168 million. Mr. Patterson is a 2002 graduate of University of California – Berkeley Law School (Boalt Hall).

15. *Benjamin Siegel* is an associate with Hagens Berman with significant experience in antitrust class actions. He is a 2007 graduate of The University of Texas School of Law, where he was an Articles Editor of the Texas Law Review, and the University of Texas Lyndon B. Johnson School of Public Affairs, graduating first in his class. After law school, Mr. Siegel was a judicial law clerk to the Honorable Thomas M. Reavley of the United States Court of Appeals for the Fifth Circuit. He was admitted to the State Bar of California in 2008 and has been admitted to practice before the courts of the State of California, the Northern District of California, the Eastern District of California, and the Ninth Circuit Court of Appeals. Since joining the firm, Mr. Siegel has had a practice focused on antitrust class actions and is a member of the Hagens Berman teams litigating *In re Resistors Antitrust Litig.*, No. 15-cv-03820 (N.D. Cal.); *In re Lithium-Ion Batteries Antitrust Litig.*, No. 13-md-02420 (N.D. Cal.); and *In re Optical Disk Drive Prods. Antitrust Litig.*, No. 10-md-2143 (N.D. Cal.)

16. *Rio Pierce* is an associate at Hagens Berman who specializes in antitrust class actions. Mr. Pierce is a member of the Hagens Berman team litigating *In re Optical Disk Drive Antitrust Litig.*, 10-md-2143-RS (N.D. Cal.) and *In re Qualcomm Antitrust Litig.*, 17-md-2773-LHK (N.D. Cal.), both of which are pending in the Northern District of California. Mr. Pierce is a 2013 magna cum laude graduate of Harvard Law School and clerked for the Honorable Jerome Farris of the United States Court of Appeals for the Ninth Circuit. Mr. Pierce is on the executive committee of the Antitrust Section of the Bar Association of San Francisco.

17. *Colleen Cleary* was an associate at Hagens Berman. She graduated from the University of San Francisco's School of Law in 2015. While in graduate school, Ms. Cleary simultaneously obtained a Masters in Business Administration.

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18. *Jongguk Choi* is a staff attorney at Hagens Berman. He obtained a J.D. degree at Tulane University Law School in 2008 and LL.M at Southern Methodist University School of Law in 2002. Jongguk Choi is a Korean native speaker, and good at Hanja (the Korean name for Chinese characters) and Korean legalese (Bachelor of Law at Korea University School of Law in 2000).

19. Helen Hsu is a staff attorney at Hagens Berman. She received her J.D. from
Washington University in St. Louis School of Law in 1999. She is fluent in English, Chinese and
Taiwanese. During her five years at Hagens Berman, she has focused exclusively on antitrust
cases including In re Optical Disk Drive Antitrust Litig., No. 10-md-2143 (N.D. Cal.); In re
Lithium-Ion Batteries Antitrust Litig., No. 13-md-02420 (N.D. Cal.); and In re Resistors Antitrust
Litig., No. 15-cv-03820 (N.D. Cal).

20. *Patrick Ryan* is a staff attorney at Hagens Berman. Mr. Ryan has a J.D. from the University of Colorado, graduating in 1993. Mr. Ryan has an undergraduate degree from the University of Texas in Economics. Mr. Ryan has over twenty years of experience, including representing private clients in a number of antitrust, merger, and patent cases. Mr. Ryan has focused exclusively on antitrust cases during his five years at Hagens Berman.

21. *Amy Elder* is a Japanese business and technical translator working on the *Batteries* antitrust case. She passed Level 1 of the Japanese Language Proficiency Test (JLPT) in 2005.
After earning an M.A. in Classical Japanese Literature at the University of Washington, she joined Hagens Berman in 2012.

22. *Jessica Jeong* is a Korean business and technical translator working on the *Batteries* antitrust case. She has been a professional translator since 2002. After attending the University of Illinois, she joined Hagens Berman in 2013.

24 23. Brian Miller has been a paralegal in Hagens Berman's Berkeley office since 2009,
25 managing complex antitrust class actions in this district including *In re Optical Disk Drive*26 Antitrust Litig., No. 3:10-md-2143 RS (N.D. Cal.); *In re Nat'l Collegiate Athletic Ass'n Athletic*27 Grant-in-Aid Cap Antitrust Litig., No. 14-md-2541-CW (N.D. Cal.); *In re Animation Workers*28 Antitrust Litig., No. 14-cv-4062-LHK (N.D. Cal.); *Edwards v. National Milk Producers*28 BERMAN DECL.. ISO MOT. FOR FEES, COSTS, AND - 8 29 SERVICE AWARDS - Case No. 4:13-md-02420-YGR

Federation, No. 11-cv-4766-JSW (N.D. Cal.); *In re Resistors Antitrust Litig.*, No. 15-cv-3820-JD
(N.D. Cal.); as well as *In re Electronic Books Antitrust Litig.*, No. 11-mc-02293 (S.D.N.Y.). Prior
to joining Hagens Berman, he was a case manager at an intellectual property litigation firm for
twelve years, specializing in complex patent litigation and amassed extensive trial experience in
districts across the country and the International Trade Commission.

24. *Jeaneth Decena* has been a paralegal in Hagens Berman's Berkeley office since 2011, managing complex antitrust class actions in this district including *In re Optical Disk Drive Antitrust Litig.*, No. 10-md-2143-RS (N.D. Cal.); *In re Lithium-Ion Batteries Antitrust Litig.*, No. 13-md-02420 (N.D. Cal.); *In re Animation Workers Antitrust Litig.*, No. 14-cv-4062-LHK (N.D. Cal.); *In re Resistors Antitrust Litig.*, No. 15-cv-3820-JD, (N.D. Cal.); and *In re Qualcomm Antitrust Litig.*, No. 17-MD-02773-LHK (N.D. Cal.). Prior to joining Hagens Berman, she was a case manager at a litigation firm for five years, specializing in complex securities and antitrust litigation. She obtained her Paralegal Certificate from the San Francisco State University – CEL in 2006, graduating with honors, and her Bachelor of Laws Degree from San Beda College Law, Manila, Philippines.

16 25. Chan (Chanyarak) Lovell has been a Paralegal Assistant in Hagens Berman since 17 2012. Her duties include gathering documents and preparing deposition files, and organizing key 18 document charts, folders, and data entries for antitrust class actions including In re Cathode Ray 19 Tube (CRT) Antitrust Litig., No. 07-md-1917-SC (N.D. Cal.); In re Optical Disk Drive Antitrust 20 Litig., No. 10-md-2143 RS (N.D. Cal.); In re Resistors Antitrust Litig., No. 15-cv-3820-JD (N.D. 21 Cal.); and In re Automotive Parts Antitrust Litig. No. 12-md-02311 (E.D. Mich.). She also assists 22 in searching for, gathering, organizing, indexing document sets and collections for use by 23 attorneys, and formatting documents for use as exhibits which includes Excel originals and 24 foreign language documents. Prior to joining Hagens Berman, she was an Instructional 25 Technician at Edmonds Community College for three years and IT/AT/Database Coordinator at 26 Disability Resource Connection for three and a half years. She graduated in B.B.A, Business 27 Computer Administration at the University of Bangkok, Thailand.

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1	I declare under penalty of perjury u	nder the laws of the United States of America that the
2	foregoing is true and correct. Executed Mag	y 26, 2017, in Seattle, Washington.
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4		/s/ Steve W. Berman STEVE W. BERMAN
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EXHIBIT 1

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/3/2013	Review and translate hot documents from DOJ production (Korean).	8	350	\$2,800.00	L140	JC
6/3/2013	Legal analysis re complaint and motions to dismiss.	2.5	700	\$1,750.00	L120	JDF
6/3/2013	Numerous emails among case team re status of translating Korean "hot documents" from Samsung; email to LG counsel re status of their document production; email to Maxell counsel re same; emails to filing unredacted motion to modify ODDs protective order to allows use of documents in Batteries case; Per J. Friedman, draft list of proposed questions for our call with battery industry expert; call with J. Friedman and battery industry expert; continue high-level review of the English documents in Samsung's production; draft analysis emails to case team re various potential hot documents and documents of interest.	9	550	\$4,950.00	L320	JTK
6/3/2013	Supervision of document translation process.	0.5	400	\$200.00	L110	MRL
6/3/2013	Update case file and contact lists of counsel for certificate of service.	0.6	250	\$150.00	L140	BRM
6/3/2013	Coordinate translations of DOJ documents. Telephone call with B. Glackin and H. Rim re same. Telephone call with J. Zahid of DPPs and follow up email to team re assignments.	1	600	\$600.00	L300	SES
6/4/2013	Review and translate hot documents from DOJ production (Korean).	7.75	350	\$2,712.50	L140	JC
6/4/2013	Review new emails re status and issues re Korean translation of Samsung hot documents; email to LG counsel following again on status of document production; same again to Maxell counsel; emails re status of serving foreign defendants; email from / to LG counsel re same; emails among case team re emails with document hosting vendor re setting up follow-up demonstration; emails among case team emails re status of joint prosecution agreement; research on re same; more emails re status of translating Korean "hot documents" from Samsung; analyze some; continue researching and drafting amended complaint; email with same to case team.	10.5	550	\$5,775.00	L210	JTK
6/4/2013	Meeting with JF, JK and SES re translation process and timeline (.5); managed document translation process, in-house and co-counsel, and formatting for certified translation vendor (.3).	0.8	400	\$320.00	L110	MRL
6/4/2013	Update case file; assist with document translations.	0.8	250	\$200.00	L140	BRM
6/4/2013	Internal HBSS meeting re DOJ documents and complaint. Call with vendor regarding translations of DOJ documents.	1	600	\$600.00	L300	SES

Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/4/2013	Coordinate translations of DOJ documents. Telephone call with DPPs and follow up email to team re assignments. Email to co-leads re update on translations and joint prosecution agreement status.	1	600	\$600.00	L300	SES
6/5/2013	Review and translate hot documents from DOJ production (Korean).	7.5	350	\$2,625.00	L140	JC
6/5/2013	Emails from Maxell counsel re status of document production; email to him re same; email to case team re same; research per J. Friedman on various issues re draft amended complaint, including what end-use products to reference in complaint; related research on market share issues in industry report and other sources; research on tools segment; research on tablet computer segment of market per J. Friedman; analysis email to case team re same; analyze new batch of translated Korean documents for possible use in next draft of complaint; review new draft of joint prosecution agreement; email re same; continued detailed legal research	10.2	550	\$5,610.00	L210	ЈТК
6/5/2013	Managed document translation process, in-house and co-counsel, and reviewed formatting for certified translation vendor.	0.8	400	\$320.00	L110	MRL
6/6/2013	Review and translate hot documents from DOJ production (Korean).	7.75	350	\$2,712.50	L140	JC
6/6/2013	Detailed research on issue re email to case team with analysis; several emails back and forth with re information on BOJ and BOK price indices to understand their composition; continue factual research for next draft of the amended complaint; continue detailed legal research continue review of Samsung English documents; continue drafting next draft of amended complaint.	9	550	\$4,950.00	L210	ЈТК
6/6/2013	Managed document translation process, in-house and co-counsel, and reviewed formatting for certified translation vendor.	0.7	400	\$280.00	L110	MRL
6/7/2013	Review and translate hot documents from DOJ production (Korean).	5.25	350	\$1,837.50	L140	JC
6/7/2013	Continue factual and legal research re next draft of amended complaint,	8	550	\$4,400.00	L210	JTK
6/7/2013	Managed document translation process, in-house and co-counsel, and reviewed formatting for certified translation vendor.	0.4	400	\$160.00	L110	MRL
6/10/2013	Review and translate hot documents from DOJ production (Korean).	7.5	350	\$2,625.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/10/2013	Prepare for, travel to SF to Lieff firm's office for demonstration of document review platform; email to J. Friedman with notes from same; follow-up email to vendor with additional questions; review responses re same; continue analysis of end-use products to include, with focus on iPods and music players; continue factual and legal research re drafting next round of draft amended complaint.	8.7	550	\$4,785.00	L210	ЈТК
6/10/2013	Managed document translation process, in-house and co-counsel, and reviewed formatting for certified translation vendor.	0.4	400	\$160.00	L110	MRL
6/10/2013	Update case file; review pleadings regarding updated service list.	1.5	250	\$375.00	L140	BRM
6/11/2013	Review and translate hot documents from DOJ production (Korean).	7	350	\$2,450.00	L140	JC
6/11/2013	Draft detailed insert for draft amended complaint re several emails re preparing detailed analysis of new set of translated Korean documents and begin drafting inserts for next draft of complaint.	9.5	550	\$5,225.00	L210	ЈТК
6/11/2013	Per S. Scarlett, research and draft memorandum re proposed list of questions	1	550	\$550.00	L110	ЈТК
6/11/2013	Managed document translation process, in-house and co-counsel, and reviewed formatting for certified translation vendor.	0.5	400	\$200.00	L110	MRL
6/11/2013	Update case file; compile translated documents for review and distribution.	3.2	250	\$800.00	L140	BRM
6/12/2013	Translate hot documents and perform quality control on other translated documents.	3.5	350	\$1,225.00	L140	JC
6/12/2013	Analyze production received today from Maxell re materials of possible use in drafting amended complaint and to be sent to translators (approximately 4500 pages); email to internal case team re analysis of same; draft proposed agenda for tomorrow's meeting with DPP and IPP lead counsel firms re filing of amended complaints; additional legal research on information exchange issues for <u>purposes</u> of drafting complaint.	7	550	\$3,850.00	L301	ЈТК
6/12/2013	Managed document translation process, in-house and co-counsel, and formatting for certified translation vendor.	0.5	400	\$200.00	L110	MRL
6/12/2013	Update case file; review and process document productions for review database.	2	250	\$500.00	L140	BRM
6/13/2013	Review and translate hot documents from DOJ production (Korean).	7.5	350	\$2,625.00	L140	JC
6/13/2013	Meeting with litigation team re strategy.	2.5	700	\$1,750.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/13/2013		8.4	550	\$4,620.00	L110	JTK
6/13/2013		5	600	\$3,000.00	L200	SES
6/14/2013	Review and translate hot documents from DOJ production (Korean).	7.75	350	\$2,712.50	L140	JC
6/14/2013	Edit complaint and review documents supporting complaint.	6.5	700	\$4,550.00	L210	JDF
6/14/2013	Continue expedited analysis / review of Maxell documents produced to DOJ for possible use in amended complaint due 6/24; several emails re agenda for. and participate in conference call with Judith Zahid and Aaron Sheanin eview chart from Ms. Zahid re same; emails to them with IPP information re same; review chart from Mr. Sheanin re same; review new draft complaint introduction from J. Friedman; discussion with him re same and strategy issues on related topics for complaint drafting, including impact of carrier subsidies on cell phones; continue online review of Maxell documents; call from Cotchett firm attorney re her research on which defendants manufacture which types of cells.	8.3	550	\$4,565.00	L120	JTK
6/14/2013	Managed document translation process, in-house and co-counsel, and reviewed formatting for certified translation vendor.	0.7	400	\$280.00	L110	MRL
6/14/2013	Assist with preparation of consolidated complaint; update case file.	1.4	250	\$350.00	L140	BRM
6/14/2013		1	600	\$600.00	L200	SES
6/15/2013	Review and translate hot documents from DOJ production (Korean).	4.5	350	\$1,575.00	L140	JC
6/17/2013	Work on amended complaint.	1	800	\$800.00	L210	SWB
6/17/2013	Review and translate hot documents from DOJ production (Korean).	6.75	350	\$2,362.50	L140	JC
6/17/2013	Edit amended complaint.	5.75	700	\$4,025.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/17/2013	Final day of researching and drafting next version of draft amended complaint; includes analyzing / reviewing translated Samsung hot documents and incorporating concepts email to co-lead counsel and case team with new draft.	13.5	550	\$7,425.00	L210	ЈТК
6/17/2013	Supervised document translation process; conducted outreach to prospective class representatives.	0.6	400	\$240.00	L110	MRL
6/18/2013	Review translation vendor's proposed change; Review DPP translator's translation.	8.75	350	\$3,062.50	L140	JC
6/18/2013	Edit complaint and review documents supporting complaint.	3.5	700	\$2,450.00	L210	JDF
6/18/2013	For next round of draft amended complaint, research /draft 2007; review all materials received from experts to see if anything else worth adding; call with DPP counsel J. Zahid and A. Sheanin re comparison of likely defendants and comparison of likely co-conspirators in respective complaints; draft various inserts for the next draft amended complaint.	8	550	\$4,400.00	L210	JTK
6/18/2013	Supervised document translation process; conducted outreach to prospective class representatives.	0.7	400	\$280.00	L110	MRL
6/19/2013	Work on amended complaint.	6	800	\$4,800.00	L210	SWB
6/19/2013	Review translations before sending to vendor.	7.75	350	\$2,712.50	L140	JC
6/19/2013	Edit complaint and review documents supporting complaint.	8.5	700	\$5,950.00	L210	JDF
6/19/2013	Begin view of newly-produced LG documents - nearly all hot or potentially usable; draft new inserts for same; research and drafting re governmental entity subclass; major push to finalize next draft of complaint and circulate internally.	13	550	\$7,150.00	L210	ЈТК
6/19/2013	Supervised document translation process; conducted outreach to prospective class representatives.	1.1	400	\$440.00	L110	MRL
6/19/2013	Process document production for loading into review database; assist with preparation of consolidated complaint.	2.1	250	\$525.00	L140	BRM
6/20/2013	Review document translations sent by vendor.	4	350	\$1,400.00	L140	JC
6/20/2013	Edit complaint and review documents supporting complaint.	2.5	700	\$1,750.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/20/2013	Numerous emails from co-counsel and internal case team re various issues with next draft of amended complaint and ongoing projects re portions of same; continue incorporating, and researching and drafting next round of draft complaint; review various LG documents flagged as hot to incorporate in complaint.	8	550	\$4,400.00	L210	ЈТК
6/20/2013	Supervised document translation process; conducted outreach to prospective class representatives.	0.5	400	\$200.00	L110	MRL
6/20/2013	Update case file; create attorney e-mail contact lists; assist with preparation of consolidated complaint.	1.3	250	\$325.00	L140	BRM
6/21/2013	Edit complaint and review documents supporting complaint.	4.25	700	\$2,975.00	L210	JDF
6/21/2013	Attention to numerous internal and external emails from co-counsel re issues re next draft of amended complaint; numerous emails re states for which we are missing plaintiffs; continue research continue revisions to introduction to incorporate best sound-bites to date; first review of Cotchett firm's detailed inserts on their review of newly produced LG documents; begin to incorporate same.	8.8	550	\$4,840.00	L210	JTK
6/21/2013	Supervised document translation process (.2); conducted outreach to prospective class representatives.(1.2).	1.4	400	\$560.00	L110	MRL
6/21/2013	Assist with preparation of consolidated complaint; update case file.	1	250	\$250.00	L140	BRM
6/24/2013	draft to-do list per J. Friedman for outstanding issues re next draft of complaint; attention to additional hot LG documents to incorporate in intro and body of draft complaint.	1.7	550	\$935.00	L210	ЈТК
6/24/2013	Outreach and communication with prospective class representatives.	2.8	400	\$1,120.00	L110	MRL
6/25/2013	Prepare for, attend call with consulting expert and J. Friedman re issues re being research on various defendants' codes of conduct re antitrust policies to include in complaint; review Lieff's and Cotchett's material on statue of limitations tolling issues; meld research and draft insert for complaint re same.	2	550	\$1,100.00	L200	JTK
6/25/2013	Outreach and communication with prospective class representatives.	2.2	400	\$880.00	L110	MRL
6/26/2013	Translate hot documents from DOJ production.	0.25	350	\$87.50	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/26/2013	Attention to responding to numerous questions from S. Scarlett from her review of draft complaint; prepare next draft of complaint; email it to DPP counsel; review their draft received today; attention to numerous issues re edits to complaint from co-counsel and internal team.	2	550	\$1,100.00	L200	ЈТК
6/26/2013	Outreach and communication with prospective class representatives.	2.7	400	\$1,080.00	L100	MRL
6/26/2013	Assist with preparation of consolidated complaint.	1.6	250	\$400.00	L140	BRM
6/26/2013	Edit amended complaint. Review documents for integration into amended complaint.	5.75	600	\$3,450.00	L210	SES
6/27/2013	Attention to responding to various factual questions from S. Scarlett re her continue review of complaint; attention to responding to numerous internal / external emails re issues re next draft of amended complaint.	1.7	550	\$935.00	L200	JTK
6/27/2013	Outreach to prospective class representatives.	2.8	400	\$1,120.00	L110	MRL
6/27/2013	Update case file; assist with preparation of consolidated complaint.	4.3	250	\$1,075.00	L140	BRM
6/27/2013	Edit amended complaint. Review documents for integration into amended complaint.	6.75	600	\$4,050.00	L210	SES
6/28/2013	Attention to efforts to harmonize DPP and IPP complaint; draft overhaul of class action allegations section of complaint; attention to addressing numerous issues raised by S. Scarlett in her continued analysis of draft complaint; continue researching continue researching / drafting next version of complaint.	8.2	550	\$4,510.00	L200	ЈТК
6/28/2013	Prospective ND class representative email and phone calls.	1.4	400	\$560.00	L110	MRL
6/28/2013	Assist with preparation of consolidated complaint.	4.3	250	\$1,075.00	L140	BRM
6/28/2013	Edit amended complaint. Review documents for integration into amended complaint.	7	600	\$4,200.00	L210	SES
6/30/2013	Sunday in office - continue revising complaint, including expanded sections re numerous causes of action, and incorporating internal and external edits into draft complaint.	4	550	\$2,200.00	L210	ЈТК
6/30/2013	Assist with preparation of consolidated complaint.	5.5	250	\$1,375.00	L140	BRM
7/1/2013	Proofed, fact- and quote-checked, autocited Amended Complaint.	10.5	250	\$2,625.00	L210	JSD
7/1/2013	Edit complaint and review documents supporting complaint.	3.5	700	\$2,450.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/1/2013	Continuing finalizing and final edits to consolidated amended complaint due tomorrow; attention to responding to punch list of draft complaint issues raises to S. Scarlett; email with responses to same; research and drafting additional information for various defendants' from their on-line "Codes of Conduct"; review latest draft complaint from Direct Purchaser Plaintiffs, and attention to selecting certain material for use in IPP complaint; attention to dozens of internal and co-counsel emails re various changes, edits and inserts and research needed to final version of amended complaint to be filed tomorrow; continue drafting / revising complaint due tomorrow.	12.5	550	\$6,875.00	L210	JTK
7/1/2013	Assist with preparation of consolidated complaint.	8.5	250	\$2,125.00	L210	BRM
7/2/2013	Work on complaint.	3	800	\$2,400.00	L210	SWB
7/2/2013	Translate hot documents from DOJ production.	0.5	350	\$175.00	L140	JC
7/2/2013	Proofed, fact- and quote-checked, autocited Amended Complaint and e-filed the same.	10.5	250	\$2,625.00	L210	JSD
7/2/2013	Edit complaint and review documents supporting complaint.	4.5	700	\$3,150.00	L210	JDF
7/2/2013	Attention to final edits of consolidated amended complaint due today; review and edit administrative motion to file under seal and supporting papers re same; attention to many dozens of internal and co-counsel emails re final edits and issues re amended complaint to be filed today; legal research on adding potential claims and attorney team re quote- checking and other administrative issues to prepare complaint for filing; draft final revisions to complaint to be filed today.	11.7	550	\$6,435.00	L210	JTK
7/2/2013	Assist with preparation and filing of consolidated complaint.	9.4	250	\$2,350.00	L210	BRM
7/3/2013	Email to defendants re their failure to meet & confer.	0.2	800	\$160.00	L390	SWB
7/3/2013	Translate hot documents from DOJ production.	0.25	350	\$87.50	L140	JC
7/3/2013	Attention to getting service of process moving for new Toshiba U.S. defendant added yesterday; review final version of direct purchaser complaint filed yesterday; organize materials cited in final version of complaint for likely future production in case; draft to-do list for next items needed done in case. Case Assessment, Development and Administration.	1	550	\$550.00	L100	ЈТК
7/3/2013	Update case file; prepare summons for new defendants; Update case file.	3.2	250	\$800.00	L120	BRM
7/5/2013	Translate hot documents from DOJ production.	0.25	350	\$87.50	L140	JC
7/5/2013	Update case file; update contact lists; general Update case file.	1.2	250	\$300.00	L120	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/8/2013	Telephone conference re hearing and expert.	1	800	\$800.00	L120	SWB
7/8/2013	Attention to service of process issues for foreign defendants including newly added ones; draft revised to-do list for next steps in case.	0.4	550	\$220.00	L100	JTK
7/10/2013	Attn. CMC preparation and legal research.	2.5	700	\$1,750.00	L230	JDF
7/10/2013	Per J. Friedman, research and draft legal and factual material for use in front of Court this week at Pre-Filing Motion Conference on various issues raised by defense counsel in recent meet/confer session; numerous emails with co- counsel re same and division of labor.	4	550	\$2,200.00	L430	JTK
7/11/2013	Prepare for pre-filing conference re motions to dismiss.	6	800	\$4,800.00	L230	SWB
7/11/2013	Continue legal and factual research per J. Friedman on various issues to be discussed with Court at tomorrow's Pre-Filing Motion Conference; numerous internal communications re same; discussions with J. Friedman re same; attention to paralegal's chart re service of process status; propose edits re same; legal research to support viability of separate governmental entity class for J. Friedman to discuss with Court tomorrow.	4	550	\$2,200.00	L450	JTK
7/11/2013	Assist with review and organization of materials for hearing.	2	250	\$500.00	L140	BRM
7/12/2013	Prepare for and attend pre-filing conference re motions to dismiss.	6	800	\$4,800.00	L230	SWB
7/12/2013	Communications with J. Friedman to assist in preparing him for court appearance today for pre-filing motion conference with Court; continue factual research for him re numerous issues raised by defense counsel in meet/confer earlier this week; continue drafting inserts re same.	3	550	\$1,650.00	L200	JTK
7/12/2013	Review of produced documents cited in consolidated complaint; update case file and contact lists.	2.4	250	\$600.00	L140	BRM
7/15/2013	Email re order on briefing.	0.5	800	\$400.00	L110	SWB
7/15/2013	Research and draft comprehensive proposed document preservation letter to go to all plaintiffs and plaintiffs' co-counsel from co-lead firms; review draft proposed order to go to Court to memorialize her rulings at last week's Pre- Filing Motion Conference; email with comments to J. Friedman; administration emails re ordering transcripts. Case Assessment, Development and Administration.	1.5	550	\$825.00	L100	JTK
7/18/2013	Review DOJ press release re LG and Sanyo pleading guilty today; review filing in LG docket re criminal Information; review filings in Sanyo docket re criminal Information; research re whether guilty pleas themselves are available yet; research on assigned two judges; internal discussions re same.	1	550	\$550.00	L120	JTK
7/22/2013	Review complaint.	2.5	125	\$312.50	L210	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/23/2013	Review defendants' letter re no objection to amended complaint remaining under seal; internal emails re preparing to publicly file same.	0.1	550	\$55.00	L100	JTK
7/23/2013	Update case file.	0.9	250	\$225.00	L140	BRM
7/24/2013	Update case file; update ECF notifications re criminal cases.	0.8	250	\$200.00	L140	BRM
7/25/2013	Telephone conference and work on chart in preparation for meet and confer with defendants.	1	800	\$800.00	L390	SWB
7/25/2013	Analyze defendants' template chart to be submitted to court re Pre-Filing Motions to Dismiss letter briefing; numerous co-counsel emails re same; call with IPP lead counsel to discuss strategy re responding to same; being research on preparing responsive chart re same.	0.9	550	\$495.00	L120	ЈТК
7/26/2013	Work on submissions re motions to dismiss.	1	800	\$800.00	L210	SWB
7/26/2013	Research on issue regarding certain California plaintiff not included in amended complaint, and two co-counsel firms not included; analyze defendants' letter brief and chart submitted today re pre-filing motion to dismiss materials; continue research on preparing chart and responsive letter to accompany chart highlighting problems with defendants' chart.	3.5	550	\$1,925.00	L200	JTK
7/26/2013	Prepare unredacted consolidated complaint for filing.	1	250	\$250.00	L210	BRM
7/29/2013	Numerous emails from co-counsel re responding to defendants' joint letter filed on Friday and charts relating to their upcoming motions to dismiss; continue researching and drafting opposing chart and letter rebutting their chart; participate in call with co-lead IPP firms re same and other related issues.	5.5	550	\$3,025.00	L200	ЈТК
7/29/2013	Read consolidated complaint.	1.5	400	\$600.00	L110	MRL
7/29/2013	Update case file.	0.6	250	\$150.00	L140	BRM
7/30/2013	Continuing researching and drafting chart and letter to court re defendants' chart as described in previous time entries.	6.5	550	\$3,575.00	L200	JTK
7/31/2013	Continue researching and drafting chart and letter to court re defendants' chart as described in previous time entries.	4.7	550	\$2,585.00	L200	JTK
8/1/2013	Legal research per request of Cotchett firm to assist on portion of letter brief to court continue research for related separate letter and chart to file this week.	3	550	\$1,650.00	L250	ЈТК
8/2/2013	Continue work on letter brief due to court this week re failings of defendants' chart re allegations in our complaint; continue work on our responsive chart re same.	3.3	550	\$1,815.00	L250	ЈТК

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/5/2013	Work on submissions re motions to dismiss.	1	800	\$800.00	L210	SWB
8/5/2013	Continue work on letter brief / chart due to court 8/9.	2	550	\$1,100.00	L250	JTK
8/6/2013	Work on submissions re motions to dismiss.	1	800	\$800.00	L210	SWB
8/6/2013	Continue research / drafting chart and letter brief due to court on 8/9.	1.5	550	\$825.00	L250	JTK
8/6/2013	Review of district cases regarding service of foreign defendants.	1.8	250	\$450.00	L120	BRM
8/7/2013	Work on submissions re motions to dismiss.	1	800	\$800.00	L210	SWB
8/7/2013	Proofed, cite- and quote-checked and fact-checked letter to the court.	2.5	250	\$625.00	L210	JSD
8/7/2013	Continue research / draft letter brief and chart due to court this week; numerous internal and external emails re same and status of other letter due to court from IPP counsel, as well as separate materials due from DPP counsel.	6.5	550	\$3,575.00	L250	JTK
8/7/2013	Assist with preparation of pre-filing letter brief.	1.6	250	\$400.00	L210	BRM
8/8/2013	Work on submissions re motions to dismiss.	1	800	\$800.00	L210	SWB
8/8/2013	Continue research / drafting detailed chart due to court this week re allegations in IPP complaint; analyze various edits to 4 letters due to court tomorrow related to same from DPP and IPP counsel.	2.5	550	\$1,375.00	L250	ЈТК
8/8/2013	Update case file; review response letter.	0.8	250	\$200.00	L140	BRM
8/9/2013	Work on submissions remotion to dismiss.	2	800	\$1,600.00	L210	SWB
8/9/2013	Numerous emails among co-counsel re finalizing filings today for DPP and IPP groups - 4 letters and 2 charts total; coordinate with paralegal re issues re formatting chart to be filed with Court today; numerous emails re coordinating with DPP group; voice-mails from Lieff attorneys re same; numerous emails re logistical issues on filing today; final review and edits of detailed chart re complaint allegations.	3	550	\$1,650.00	L250	JTK
8/12/2013	Update case file and calendar.	0.25	250	\$62.50	L140	JSD
8/26/2013	Update case file and calendar.	0.25	250	\$62.50	L140	JSD
9/13/2013	Email from / to J. Friedman re new hearing set in Sanyo criminal case and analyzing various materials now in criminal docket; analyze same including plea agreement and proposed sentencing materials and victim notification materials; attention to review similar materials in LG criminal docket; evaluate possible use of materials in motion to dismiss briefing, including references to concealment of conspiracy relevant to statute of limitations issue.	1.5	550	\$825.00	L110	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/13/2013	Update case file and calendar.	0.3	250	\$75.00	L140	BRM
9/17/2013	Review motions to dismiss; call re motions to dismiss.	5.5	700	\$3,850.00	L200	JDF
9/17/2013	Analyze 7 motions to dismiss filed yesterday; draft initial outline of key issue necessary to respond to same; participate in call with indirect co-lead firms re preparing responses to same; begin research and analysis on our firm's initial assigned briefs re Hitachi / Maxell and Toshiba and statute of limitations issues applicable to all defendants.	7.5	550	\$4,125.00	L200	ЈТК
9/17/2013	Download motions to dismiss; create attorney worksets; update case file.	2.4	250	\$600.00	L140	BRM
9/18/2013	Analyze issues regarding motion to dismiss.	2.5	700	\$1,750.00	L200	JDF
9/19/2013	Analyze issues regarding motion to dismiss.	1.5	700	\$1,050.00	L200	JDF
9/19/2013	Call with indirect and direct purchaser initial briefing teams for responding to 7 motions to dismiss regarding coordinating on overlapping issues; continue research / drafting on opposing Hitachi / Maxell and Toshiba motions to dismiss, and for overarching statute of limitations issues re all defendants.	4	550	\$2,200.00	L200	ЈТК
9/20/2013	Office conference re motions to dismiss.	1	800	\$800.00	L210	SWB
9/20/2013	Travel to, attend criminal case hearing for Sanyo in Oakland courthouse; return to firm; verbal summary to case team attorneys re same; draft detailed hearing summary for other IPP co-lead firms; continue research / drafting on opposing Hitachi / Maxell and Toshiba motions to dismiss, and for overarching statute of limitations issues re all defendants.	6	550	\$3,300.00	L450	ЈТК
9/23/2013	Per agreement of IPP and DPP motion to dismiss briefing teams, research and draft detailed outline re opposing Hitachi / Maxell and Toshiba motions to dismiss; review 3 other outlines from Leif firm on other defendants' MTDs; review 4 outlines from DPP briefing team re same; begin analysis on how to meld outlines across teams; continue research / drafting on opposing Hitachi / Maxell and Toshiba motions to dismiss, and for overarching statute of limitations issues re all defendants.	6.5	550	\$3,575.00	L200	ЈТК
9/24/2013	Call with DPP and IPP briefing teams re how to meld outlines for responding to 7 motions to dismiss; draft internal summary re results of same and next steps on MTD briefing; review new class certification order in CRTs case for applicability to Batteries case issues; research on, and numerous internal case team emails regarding third party discovery plan to be implemented in Batteries case to obtain successful result as in CRTs case on class certification; continue research / drafting on opposing Hitachi / Maxell and	4.5	550	\$2,475.00	L200	ЈТК

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Toshiba motions to dismiss, and for overarching statute of limitations issues re all defendants.					
9/27/2013	Analyze issues regarding motion to dismiss.	2.25	700	\$1,575.00	L200	JDF
9/30/2013	Analyze 5 draft oppositions to motions to dismiss prepared by DPPs per agreement, in preparation of next phase of drafting to be done by IPPs; research on some of the cited cases utilized in same to discuss with DPPs.	1.7	550	\$935.00	L200	ЈТК
10/1/2013	Edit and research opposition to Motion to Dismiss.	2.5	700	\$1,750.00	L210	JDF
10/1/2013	Continue analysis of 5 drafts of MTD opposition briefs received from various DPP and IPP firms; internal and co-counsel emails re same.	1	550	\$550.00	L120	JTK
10/2/2013	Prepared shells for opposition briefs.	0.5	250	\$125.00	L210	JSD
10/2/2013	Edit and research opposition to Motion to Dismiss.	2.5	700	\$1,750.00	L210	JDF
10/2/2013	Continue analysis of 5 drafts of MTD opposition briefs received from various DPP and IPP firms; internal and co-counsel emails re same; begin edits to same.	1.5	550	\$825.00	L120	ЈТК
10/3/2013	Quote- and fact-checked and autocited opposition briefs.	1.75	250	\$437.50	L210	JSD
10/3/2013	Edit and research opposition to Motion to Dismiss.	2.75	700	\$1,925.00	L210	JDF
10/4/2013	Edit and research opposition to Motion to Dismiss.	2.25	700	\$1,575.00	L210	JDF
10/4/2013	Continue revisions to opposition to draft motions to dismiss, per agreements among IPP and DPPs; several emails with co-counsel re issues re same.	2.5	550	\$1,375.00	L430	JTK
10/7/2013	Formatted opposition briefs.	0.5	250	\$125.00	L210	JSD
10/7/2013	Edit and research opposition to Motion to Dismiss.	2	700	\$1,400.00	L210	JDF
10/7/2013	Attention to 41 emails among internal and co-counsel case team on numerous issues relating to edits and revisions to oppositions to motions to dismiss; research and draft significant overhaul to opposition to Hitachi / Maxell motion; continue research and drafting revisions to Toshiba MTD; review edits from J. Friedman to Hitachi / Maxell; research on questions raised by him; draft revisions regarding same; analyze several new drafts of revisions to various opposition briefs sent today by Lieff firm.	7.5	550	\$4,125.00	L200	ЈТК
10/8/2013	Fact- and quote-checked, autocited and proofed opposition briefs.	2.5	250	\$625.00	L210	JSD
10/8/2013	Edit and research opposition to Motion to Dismiss.	2.25	700	\$1,575.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/8/2013	Attention to 35 internal and external case team emails related to numerous issues on status of opposition brief drafting process re motions to dismiss; continue detailed revisions and edits to opposition to Toshiba motion; review edits / comments from J. Friedman re same; draft new revisions re same; research and draft section for main opposition brief re joint motion to dismiss addressing the statute of limitations issues.	6.5	550	\$3,575.00	L200	JTK
10/9/2013	Edit and research opposition to Motion to Dismiss.	2.25	700	\$1,575.00	L210	JDF
10/9/2013	Continue researching / drafting statute of limitations section of opposition to joint motion to dismiss; attention to 25 internal and external case team emails on numerous issues related to the opposition briefs drafting process; conference call with DPP and IPP brief drafting team to discuss status of various drafting issues; review latest revised drafts from Lieff and Cotchett firms.	4.5	550	\$2,475.00	L200	JTK
10/10/2013	Fact- and quote-checked, autocited and proofed opposition briefs.	3	250	\$750.00	L210	JSD
10/10/2013	Edit and research opposition to Motion to Dismiss.	2.25	700	\$1,575.00	L210	JDF
10/10/2013	Numerous internal and co-counsel emails re who is covering the LG criminal plea hearing today; attention to 37 total case emails on LG issues, status of opposition brief drafting re MTDs, entering a stipulation of service of process with NEC counsel; draft email to NEC counsel re same; drafts revisions to statute of limitations inserts to go in main opposition brief; review first semi-complete draft of opposition to motion to dismiss; review latest revised drafts to individual motions to dismiss.	4.7	550	\$2,585.00	L120	ЈТК
10/11/2013	Fact- and quote-checked, autocited and proofed opposition briefs.	3.25	250	\$812.50	L210	JSD
10/11/2013	Attention to 37 case emails from internal and external case team members on numerous issues re oppositions to motions to dismiss; conference call with DPP and IPP briefing teams to discuss final steps in finishing briefs.	1.5	550	\$825.00	L120	ЈТК
10/13/2013	Research and draft newest revisions to Sony MTD opposition, including assimilating latest Cotchett firm comments, and incorporating standardized sections from LG MTD opposition brief where appropriate; repeated same process for Sony / Panasonic opposition brief; emails to IPP and DPP briefing team with latest drafts.	3	550	\$1,650.00	L200	ЈТК
10/14/2013	Edit and research opposition to Motion to Dismiss.	3	700	\$2,100.00	L210	JDF
10/14/2013	Attention to 34 internal and external IPP and DPP case team emails re latest revisions to MTD opposition briefs; review latest drafts.	1	550	\$550.00	L200	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/15/2013	Attention to 45 external case team emails among DPP and IPP briefing team to finalize numerous opposition briefs due tomorrow; propose edits to proposed orders; attention to whether we will join DPP motion to strike; attention to draft request for judicial notice; review latest draft opposition briefs.	1.3	550	\$715.00	L200	JTK
10/16/2013	Attention to 39 external case team emails re finalizing opposition briefs due today; final review of latest drafts.	1.2	550	\$660.00	L120	JTK
10/17/2013	Internal emails and emails with Lieff firm re status of litigation fund and paying translation invoice; research on options to serve amended complaint on GS Yuasa defendant in Japan.	0.7	550	\$385.00	L190	ЈТК
10/21/2013	Call with Terry Gross and Sarah Crowley from DPP case team regarding coordinating on issues re serving amended complaints on GS Yuasa in Japan; factual research on issues raised by DPPs regarding proper entity to serve; research on issues regarding whether mail service is permissible under Hague Convention.	0.7	550	\$385.00	L120	JTK
10/23/2013	Several internal and external emails re IPP lead firms regarding availability of Japanese translators to translate IPP complaint for service in Japan on GS Yuasa.	0.3	550	\$165.00	L120	ЈТК
11/7/2013	Review 6 reply brief filed yesterday by Defendants in support of their motions to dismiss; draft basic summary of them for internal case team.	1.5	550	\$825.00	L200	JTK
11/7/2013	Organization and review of motion to dismiss reply briefs.	2.6	250	\$650.00	L140	BRM
11/15/2013	Translate and send document.	0.3	125	\$37.50	L140	AE
11/15/2013	Internal and external communications with Lieff firm re status of finalizing Japanese translations of complaint and summons to initiate foreign service of process on defendant GS Yuasa Corp	0.3	550	\$165.00	L100	ЈТК
11/21/2013	Email re hearing on motions to dismiss.	0.5	800	\$400.00	L120	SWB
11/22/2013	Emails to / from Gross Belsky firm re status of direct purchaser and indirect purchaser foreign service of process on GS Yuasa Corp.	0.2	550	\$110.00	L100	JTK
11/25/2013	Prepare for hearing on motions to dismiss.	4	800	\$3,200.00	L230	SWB
11/26/2013	Prepare for hearing on motions to dismiss.	4	800	\$3,200.00	L230	SWB
11/26/2013	Review defendants' proposed letter to court with proposed order of arguments for upcoming motion to dismiss hearing; several emails from IPP co-counsel re same; draft proposed revision to same; several emails among co-counsel re same.	0.3	550	\$165.00	L200	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/27/2013	Prepare for hearing on motions to dismiss.	2	800	\$1,600.00	L230	SWB
12/2/2013	Prepare for hearing on motions to dismiss.	1	800	\$800.00	L230	SWB
12/2/2013	Prepared summons and documents for international service; fixed form formatting to accommodate contents/information necessary for the summons; Reviewed service of summons to Japan.	3.8	250	\$950.00	L210	JSD
12/2/2013	Email to Lieff firm regarding defendants' letter to court suggesting agenda for upcoming motion to dismiss hearing; email to DPP counsel re translations of complaints; email to paralegal regarding preparing cover letter Japan Ministry of Foreign Affairs to accompany complaints for service; several related emails; emails from / to paralegal and Lieff firm re several more emails re issues re same; review draft letter from paralegal to Japanese Ministry; draft edits re same.	1.5	550	\$825.00	L100	JTK
12/3/2013	Emails re motion to dismiss hearing.	0.5	800	\$400.00	L230	SWB
12/3/2013	Prepared documents for transmission to Japan Foreign Ministry.	2.8	250	\$700.00	L210	JSD
12/3/2013	Several emails with paralegal regarding materials needed to prepare for upcoming motion to dismiss hearing and work with S. Berman to prepare; begin detailed hearing prep. re same with focus on statute of limitations issues.	2	550	\$1,100.00	L250	ЈТК
12/4/2013	Continue prep for this week's hearing on motions to dismiss.	1.5	550	\$825.00	L200	JTK
12/5/2013	Prepare for hearing on motions to dismiss.	8	800	\$6,400.00	L230	SWB
12/5/2013	Several emails to / from S. Berman re his question in preparation for tomorrow's hearing on motions to dismiss; legal research on same; draft analysis of defendants' reply brief per request of S. Berman; research per S. Berman on research on issue re	4.5	550	\$2,475.00	L200	ЈТК
12/5/2013	Assist with hearing preparation.	1.4	250	\$350.00	L140	BRM
12/6/2013	Prepare for and attend hearing on motions to dismiss.	10	800	\$8,000.00	L230	SWB
12/6/2013	Travel to, attend hearing on defendants' motions to dismiss, return to office; verbal briefing to S. Scarlett re same; draft analysis re same for J. Friedman.	4.5	550	\$2,475.00	L450	JTK
12/23/2013	Analyze recent letters from SANYO / Panasonic and SONY counsel re status of their DOJ productions to us; case team emails re same; being factual research on preparing responses to same.	0.4	550	\$220.00	L120	ЈТК

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/2/2014	Eight emails from / to S. Scarlett re status of retaining translators to review recent Japanese defendant productions.	0.3	550	\$165.00	L301	ЈТК
1/3/2014	Calendared scheduling order.	0.5	250	\$125.00	L100	JSD
1/3/2014	Attention to 27 case-related emails; research and draft responsive letter to Sony counsel re issues raised by their letter regarding status of producing DOJ documents; review J. Friedman edits; revise letter; email to IPP co-lead counsel re same; research and draft responsive letter to Sanyo / Panasonic counsel re issues raised by their letter regarding status of producing DOJ documents; email to IPP co-lead counsel re same.	1.5	550	\$825.00	L301	ЈТК
1/6/2014	Attention to 23 case related emails; review co-counsel edits to my draft letters to defense counsel on DOJ document issues; revise letters re same; email to Sony counsel re same; email to Sanyo / Panasonic counsel re same; numerous emails among co-counsel re finalizing same.	1.4	550	\$770.00	L301	JTK
1/7/2014	Call from DPP counsel Rick Saveri and Todd Seaver re number of issues, including them joining my letters yesterday to Sony and Sanyo/Panasonic re DOJ doc issues, document vendor issues, document translation issues; several internal firm emails regarding issues raised by DPPs re document vendor and translation issues; review letter from DPP to Sony and Sanyo/Panasonic counsel.	1	550	\$550.00	L301	ЈТК
1/10/2014	Review letter from Sony counsel responding to my letter re DOJ documents; review letter from Sanyo/Panasonic counsel responding to my letter; meet with J. Friedman re responding to same; research and draft responsive letters to both defendants.	1.7	550	\$935.00	L301	ЈТК
1/13/2014	Continue researching and drafting responsive letters to Sony and Sanyo/Panasonic counsel re issues raised in their recent letters re DOJ production issues; several emails among IPP co-lead counsel re drafting portions of upcoming CMC Statement and strategy re same.	0.8	550	\$440.00	L301	JTK
1/13/2014	Analyze two recent letters from defense counsel for SANYO/Panasonic and Sony re status of their DOJ productions to us; emails among case team re responding to same; factual research on issues raised in letters.	0.4	550	\$220.00	L120	JTK
1/13/2014	Assist attorneys with document requests; review time records for approval.	2	250	\$500.00	L140	BRM
1/14/2014	Attention to finalizing responsive letters to Sony and Sanyo/Panasonic counsel; attention to approximately 20 emails among IPP co-counsel re strategy on drafting upcoming CMC Statement.	0.6	550	\$330.00	L120	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/15/2014	Attention to approximately 30 case-related emails, mainly on strategy issues on drafting CMC statement due this week; email to Sony counsel re DOJ issues; email to Sanyo/Panasonic counsel re DOJ issues; internal emails on status of selecting translators re Japanese documents.	0.8	550	\$440.00	L120	JTK
1/16/2014	Attention to 35 case-related emails; internal and external communication with co-counsel re ; research and draft section of opposition.	1.5	550	\$825.00	L230	JTK
1/17/2014	Prepare for CMC and address issues.	1	800	\$800.00	L230	SWB
1/17/2014	Edit and research opposition to Motion to Dismiss.	2.5	700	\$1,750.00	L120	JDF
1/17/2014	Attention to 66 case related emails, principally on opposing defendants' motion to adjourn CMC; call with IPP co-lead firms re same and dividing work re same; draft revision to same; communication with paralegal and database vendor re problems with one recent DOJ production on technical issues; email to defense counsel Amato re same.	2.5	550	\$1,375.00	L230	JTK
1/21/2014	Attention to approximately 30 emails among IPP, DPP and defense counsel re issues re the upcoming CMC; draft email to GS Yuasa counsel regarding stipulation for time to it to respond to complaint.	0.4	550	\$220.00	L190	JTK
1/22/2014	Review order on motion to dismiss.	1	800	\$800.00	L210	SWB
1/22/2014	Conversations with Tony Shapiro and Jeff Friedman re batteries staffing. Draft plan re discovery role I can play.	2.1	475	\$997.50	L120	RSS
1/23/2014	Telephone conference re amending complaint and other items.	2	800	\$1,600.00	L120	SWB
1/23/2014	Call with IPP co-lead firms re number of issues, including selecting document review platform vendor and plan to review recently produced DOJ documents; several related emails re same; research on prior meeting with document platform vendors.	1.1	550	\$605.00	L301	ЈТК
1/23/2014	Review of batteries pleadings.	2	475	\$950.00	L120	RSS
1/24/2014	Meet with potential expert.	2	800	\$1,600.00	L130	SWB
1/24/2014	Research and draft internal detailed plan on dividing up work assignments to review DOJ documents and to address issues in amended complaint.	0.5	550	\$275.00	L301	JTK
1/27/2014	Work on case management statement.	0.7	800	\$560.00	L210	SWB
1/27/2014	Office conference re legal research re jurisdiction.	0.3	800	\$240.00	L120	SWB
1/27/2014	Attn. document review platform.	2.5	700	\$1,750.00	L120	JDF
1/27/2014	Participate in WebEx and conference call with Catalyst document review platform representative and J. Friedman to assist in finalizing decision on	0.5	550	\$275.00	L301	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	vendor; meet with J. Friedman re same.					
1/27/2014	Draft memo re amending the complaint and personal jurisdiction issues.	9.1	475	\$4,322.50	L120	RSS
1/28/2014	Work on CMO and jurisdiction issues.	1.5	800	\$1,200.00	L120	SWB
1/28/2014	Draft memo re amending the complaint and personal jurisdiction issues.	10	475	\$4,750.00	L120	RSS
1/29/2014	Edit and research opposition to Motion to Dismiss.	3.5	700	\$2,450.00	L120	JDF
1/29/2014	Participate in meet/confer with defense counsel and IPP and DPP co-leads re issues re preparing joint CMC Statement as directed by court; meet with J. Friedman, and research and draft proposed insert regarding areas of discovery suggested by IPPs; several internal emails refining same.	1.2	550	\$660.00	L230	ЈТК
1/29/2014	Draft memo re	9.5	475	\$4,512.50	L120	RSS
1/30/2014	Draft memo re	7.5	475	\$3,562.50	L120	RSS
1/31/2014	Attention to numerous drafts of joint CMC Statement; emails with DPP counsel	0.4	550	\$220.00	L301	ЈТК
1/31/2014	Draft memo re	5.7	475	\$2,707.50	L120	RSS
2/1/2014	Draft memo re	5.5	475	\$2,612.50	L120	RSS
2/2/2014	Draft memo re	1.5	475	\$712.50	L120	RSS
2/3/2014	Emails among DPP and IPP counsel re meet/confer with GS Yuasa re status of it producing DOJ documents; additional emails regarding terms by which we will consider its production acceptable.	0.3	550	\$165.00	L302	ЈТК
2/3/2014	Drafted memo	9	475	\$4,275.00	L110	RSS
2/4/2014	Several emails among IPP / DPP counsel re scheduling meet/confer call with Sony re issues with its DOJ document production.	0.3	550	\$165.00	L302	JTK
2/4/2014	Drafted memo	9.5	475	\$4,512.50	L110	RSS
2/5/2014	Search for and circulate a list of batteries translations.	1	350	\$350.00	L140	JC
2/5/2014	Download documents and save to system; Rename rough translation documents and save to shared folder.	2	150	\$300.00	L140	CL
2/5/2014	Document review update case file.	5.2	250	\$1,300.00	L140	BRM
2/5/2014	Review status of translations;	1.5	650	\$975.00	L140	GWS
2/5/2014	Drafted memo	8.4	475	\$3,990.00	L110	RSS
2/6/2014	Prepare for and attend meet/confer with Sony's counsel re issues with its DOJ production; draft strategy emails to co-counsel re issue Sony raising re Apple objecting to production on NDA grounds; strategy emails re framing request to NEC for DOJ documents.	0.8	550	\$440.00	L302	ЈТК

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/6/2014	Drafted discovery plan for amending the complaint to present to co-lead counsel. Drafted coding form and other materials to provide to review team.	7.9	475	\$3,752.50	L110	RSS
2/7/2014	Prepped and readied conference room for counsel's meeting pre-hearing; ordered lunches and gave general assistance to the meeting attendees.	1.5	250	\$375.00	L200	JSD
2/7/2014	Calendared due dates/hearing date.	0.75	250	\$187.50	L210	JSD
2/7/2014	Meet and confer re schedule with defendants.	1	700	\$700.00	L200	JDF
2/7/2014	Prepare for and attend pre-hearing meeting of IPP and DPP counsel re strategy for today's meeting; emails among document coding team re proposed protocol issues.	1.5	550	\$825.00	L450	JTK
2/7/2014	Drafted discovery plan for amending the complaint to present to co-lead counsel. Drafted coding form and other materials to provide to review team.	9.1	475	\$4,322.50	L110	RSS
2/10/2014	Attend strategy conference call with IPP co-leads following Friday's status conference to discuss discovery meet/confer strategy and related topics; emails with DPP's re proposing 26(f) date to defendants; emails among IPP co-leads re dividing up DOJ documents to review.	0.8	550	\$440.00	L302	ЈТК
2/10/2014	Drafted discovery plan for amending the complaint to present to co-lead counsel. Drafted coding form and other materials to provide to review team.	6.9	475	\$3,277.50	L120	RSS
2/11/2014	Prepare for and attend confer call with IPP co-lead firms regarding dividing up DOJ documents for review and training reviewers; emails regarding setting date for 26(f) conference; review draft letter from Cotchett firm inviting Exec Committee firms to participate in review; draft edits to same; attention to several emails re Apple's objections to certain defendants producing DOJ documents; various administrative emails re case management issues.	2	550	\$1,100.00	L100	ЈТК
2/11/2014	Prepared coding manual and other materials to support document review for amending the complaint.	2.4	475	\$1,140.00	L120	RSS
2/12/2014	Attention to 40 case emails on various topics including progress in setting 26(g) date, establishing document review training materials, status of letter to Exec Committee firms and the call with document translation vendor interested in bidding on work.	1.2	550	\$660.00	L190	JTK
2/12/2014	Create excel charts for Ms. Spiegel.	0.3	150	\$45.00	L140	CL
2/12/2014	Call with co-lead counsel re planning for review to amend the complaint. Prepared materials to organize upcoming review.	6.9	475	\$3,277.50	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/13/2014	Participate in conference call with IPP co-leads regarding how to divide up short-term document project of DOJ documents in order to amend complaint by March 26; attention to follow-up emails re same.	0.5	550	\$275.00	L300	ЈТК
2/13/2014	Prepared materials to organize document review for amending the complaint. Organized translations. Worked with co-counsel to start planning database coding and materials for review team.	8.9	475	\$4,227.50	L120	RSS
2/14/2014	Download translation documents and save to system for Ms. Spiegel; Create master exhibit list charts and fill in bates info and additional detail.	2.8	150	\$420.00	L140	CL
2/14/2014	Organized upcoming review. Planned coding materials and review procedures. Discussed and planned coordination for joint review with direct purchaser plaintiffs.	8.6	475	\$4,085.00	L120	RSS
2/18/2014	Organized review plan and drafted review materials. Coordinated with direct counsel on how to implement Japanese language joint review.	9.2	475	\$4,370.00	L120	RSS
2/19/2014	Located and pulled 30(b)(6) notices to use as discovery templates.	0.75	250	\$187.50	L300	JSD
2/19/2014	Organization of review for amending the complaint. Prepared materials for review team. Worked with Catalyst to get database organized and set up for review. Discussions with co-counsel and counsel for directs re coordination.	9.1	475	\$4,322.50	L120	RSS
2/20/2014	Emails re document review.	1	800	\$800.00	L140	SWB
2/20/2014	Calls re discovery.	1.25	700	\$875.00	L300	JDF
2/20/2014	Prepare for and participate in meet/confer with defense, DPP, IPP counsel re discovery issues in advance of court filing re same due next week; participate in pre-meet/confer strategy call with IPP and DPP counsel; draft and revise notes re results of meet/confer to prepare for our section of court filing; email to IPP and DPP counsel re same; research on	1.5	550	\$825.00	L300	ЈТК
2/20/2014	Review complaint and arrange for review of Japanese language documents for amended complaint.	1.3	650	\$845.00	L140	GWS
2/20/2014	Conference call with directs re coordination for joint review. Organized database with Catalyst. Planned materials for review to train reviewers.	8.2	475	\$3,895.00	L120	RSS
2/21/2014	Participate in Catalyst review platform training session; emails re additional ways to improve the document reviewer training materials; approximately 15 emails among co-counsel regarding potential use of ODD ESI and deposition protocols in this case, and pro's / con's of same.	1.8	550	\$990.00	L302	JTK
2/21/2014	Finalize arrangements for Japanese language document review.	0.5	650	\$325.00	L140	GWS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/21/2014	Training call with Catalyst. Organized database with Catalyst. Planned materials for review to train reviewers.	8.4	475	\$3,990.00	L120	RSS
2/24/2014	Meet with Ms. Spiegel; review case materials.	3.5	125	\$437.50	L140	AE
2/24/2014	Attn. briefing schedule.	3.5	700	\$2,450.00	L210	JDF
2/24/2014	Draft first draft of Plaintiffs' submission to court due Friday re status of discovery meet/confer; review edits from J. Friedman; draft additional edit; emails with S. Berman; email to IPP and DPP co-lead with draft.	1.5	550	\$825.00	L250	ЈТК
2/24/2014	Download and rename LGC documents and save to shared folder for Ms. Spiegel.	2.3	150	\$345.00	L140	CL
2/24/2014	Training call with Catalyst. Organized database with Catalyst. Planned materials for review to train reviewers.	9.5	475	\$4,512.50	L120	RSS
2/25/2014	Review case materials and Catalyst Insight tutorial.	6.2	125	\$775.00	L140	AE
2/25/2014	Analyze 3 sets of edits on discovery status report to file with court Friday from Cotchett, Lieff, and Berman Devalerio firms; draft new version integrating all edits; several emails among IPP and DPP counsel re finalizing same; email to defense counsel with same; email to defense counsel proposing use of ODD ESI and deposition protocols for meet/confer; several emails among co-counsel re today's communications with defendants; attention to document review training / coding materials to prepare to assist in analyzing / finding documents to assist with amended complaint.	3.4	550	\$1,870.00	L250	ЈТК
2/25/2014	Save documents to shared folder for Ms. Spiegel.	0.3	150	\$45.00	L140	CL
2/25/2014	Worked with Catalyst to organize database and plan for review. Trained reviewers. Worked with directs to coordinate on Japanese language documents. Planned and drafted review materials. Organized review team.	9.1	475	\$4,322.50	L120	RSS
2/26/2014	Catalyst meeting; review DOJ productions.	6.5	125	\$812.50	L140	AE
2/26/2014	Discussion with J. Friedman re strategy on amending complaint re subsidiary defendants: legal and factual research on same; begin analysis of attention to DPPs' new revised version of joint discovery status update to file Friday; several emails among document review team re setting additional Cataylst training call for tomorrow; review updated materials on document review training.	3	550	\$1,650.00	L120	JTK
2/26/2014	Team meeting.	0.5	150	\$75.00	L140	CL
2/26/2014	Catalog recent document productions; Update case file.	1.2	250	\$300.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/26/2014	Training call for reviewers. Organized review plan.	1.5	475	\$712.50	L120	RSS
2/27/2014	Reviewed docket and calendared due dates.	1	250	\$250.00	L140	JSD
2/27/2014	Advanced Catalyst meeting; review documents on platform.	4	125	\$500.00	L140	AE
2/27/2014	Attn case management conference and briefing issues.	2.25	700	\$1,575.00	L230	JDF
2/27/2014	Attend Catalyst document review platform additional training session; review additions from defense counsel re joint discovery status statement due this week; emails from DPP counsel sending additional proposed ESI protocol to defense counsel; numerous emails among plaintiffs' counsel re strategic issues re same; analysis of	1.1	550	\$605.00	L302	JTK
2/27/2014	Review order re scheduling for motion to dismiss; work on status conference submission; meet with Japanese language reviewers.	1.3	650	\$845.00	L210	GWS
2/27/2014	Training calls with reviewers. Planned database fields and worked out issues of uploading with Catalyst. Coordinated joint review with directs for Japanese language documents.	8.9	475	\$4,227.50	L120	RSS
2/28/2014	Formatted letter from JDF to McGinnis.	0.5	250	\$125.00	L390	JSD
2/28/2014	Review DOJ productions.	8	125	\$1,000.00	L140	AE
2/28/2014	Call re facts; draft re discovery.	2.5	700	\$1,750.00	L300	JDF
2/28/2014	attention to several emails among IPP and DPP counsel re whether DPPs will retract ESI protocol they sent to defendants yesterday; attention to finalizing joint discovery meet/confer report due to Court today; call with defense liaison counsel re same; emails to / from him re finalizing same; emails with IPP counsel re finalizing same; review defendants' new edits; draft responsive edit for same; emails among IPP and DPP counsel re accepting same; final preparations for filing and file same, including modifications to signature block requested by defense liaison counsel and solving issues with signature block errors.	4	550	\$2,200.00	L430	JTK
2/28/2014	Review joint statement re meet and confer.	0.5	650	\$325.00	L210	GWS
2/28/2014	Organized and managed review for amending the complaint. Organized and managed the review for amending the complaint.	9.6	475	\$4,560.00	L120	RSS
3/3/2014	Review DOJ productions.	7.7	125	\$962.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/3/2014	Attention to emails among co-counsel and defense counsel re status of negotiations on ESI protocol; attention to new draft of stipulation regarding voluntary dismissal of certain of IPPs' claims.	0.3	550	\$165.00	L190	JTK
3/3/2014	Meeting; Put together folders of Japanese documents for Japanese review team.	2	150	\$300.00	L140	CL
3/3/2014	Call with co-counsel re organization of document review. Management of review and coding. Review of coding results.	8.3	475	\$3,942.50	L110	RSS
3/4/2014	Review DOJ productions.	7	125	\$875.00	L140	AE
3/4/2014	Management of review and coding. Review of coding results.	9.2	475	\$4,370.00	L110	RSS
3/5/2014	Review DOJ productions.	7.5	125	\$937.50	L140	AE
3/5/2014	Prep for and attend telephonic meet/confer with defense counsel / IPP counsel / DPP counsel on negotiating ESI protocol; draft summary of same for J. Friedman.	0.4	550	\$220.00	L300	ЈТК
3/5/2014	Prepare for and attend telephonic meet/confer with DPP, IPP and defense counsel re ESI protocol; draft summary of same for J. Friedman.	0.5	550	\$275.00	L250	JTK
3/5/2014	Catalyst training for searching, printing and downloading documents.	2.5	150	\$375.00	L140	CL
3/5/2014	Management of review and coding. Review of coding results.	5.5	475	\$2,612.50	L110	RSS
3/6/2014	Review DOJ productions; Telephone meeting.	7.7	125	\$962.50	L140	AE
3/6/2014	Review Japanese document translations; email to document translators.	1	650	\$650.00	L140	GWS
3/6/2014	Management of review and coding. Review of coding results.	4	475	\$1,900.00	L110	RSS
3/7/2014	Review DOJ productions.	8	125	\$1,000.00	L140	AE
3/7/2014	Prepare for, attend IPP / DPP strategy call on defendants' proposed changes to draft ESI protocol.	0.7	550	\$385.00	L302	JTK
3/7/2014	Prepare for and attend conference call with DPP and IPP counsel re issues with defendants' proposed edits to draft ESI protocol; analyze defendants supplemental motion to dismiss IPP complaint filed today; analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; begin research and drafting process for amended complaint based on results contained in spreadsheet.	7.8	550	\$4,290.00	L210	ЈТК
3/7/2014	Format report document and print.	3	150	\$450.00	L140	CL
3/7/2014	Review supplemental motion to dismiss IPP complaint and supporting declaration.	1.3	650	\$845.00	L210	GWS
3/7/2014	Management of review and coding. Review of coding results.	9.2	475	\$4,370.00	L110	RSS
3/8/2014	Management of review and coding. Review of coding results.	2	475	\$950.00	L110	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/9/2014	Review material in preparation for document review.	3.9	375	\$1,462.50	L140	JAL
3/10/2014	Email re complaint.	0.5	800	\$400.00	L210	SWB
3/10/2014	Signed up Craig Spiegel to bird-dog Batteries case.	0.25	250	\$62.50	L210	JSD
3/10/2014	Reviewed the docket and the judge's standing order.	1	250	\$250.00	L140	JSD
3/10/2014	Review DOJ productions.	7	125	\$875.00	L140	AE
3/10/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	8	550	\$4,400.00	L210	ЈТК
3/10/2014	Review materials in preparation for document review-4.8; Conference call regarding document review, copy notes from said call7; Conference call regarding training on document review database, copy notes from said call9.	6.4	375	\$2,400.00	L140	JAL
3/10/2014	Management of review and coding. Review of coding results. Call with co- counsel. Call with review team members.	9.1	475	\$4,322.50	L110	RSS
3/11/2014	Formatted and proofed second amended complaint.	5	250	\$1,250.00	L210	JSD
3/11/2014	Review DOJ productions.	7	125	\$875.00	L140	AE
3/11/2014	Discuss and analyze amended complaint.	1.5	700	\$1,050.00	L210	JDF
3/11/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	8.5	550	\$4,675.00	L210	ЈТК
3/11/2014	Review materials in preparation for document review-2.4. Review documents produced to DOJ and translations for purpose of amending complaint-3.8.	6.2	375	\$2,325.00	L140	JAL
3/11/2014	Management of review and coding. Review of coding results.	8.7	475	\$4,132.50	L110	RSS
3/12/2014	Review DOJ productions.	7.5	125	\$937.50	L140	AE
3/12/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	8.8	550	\$4,840.00	L210	ЈТК
3/12/2014	Review documents produced to DOJ and translations for purpose of	7.3	375	\$2,737.50	L140	JAL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	amending complaint					
3/12/2014	Management of review and coding. Review of coding results.	9.2	475	\$4,370.00	L110	RSS
3/13/2014	Review DOJ productions.	7.5	125	\$937.50	L140	AE
3/13/2014	Analyze and edit amended complaint.	1.3	700	\$910.00	L210	JDF
3/13/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	9.2	550	\$5,060.00	L210	JTK
3/13/2014	Review documents produced to DOJ and translations for purpose of amending complaint	4.9	375	\$1,837.50	L140	JAL
3/13/2014	Update case file; catalog document productions.	1	250	\$250.00	L140	BRM
3/13/2014	Management of review and coding. Review of coding results.	8.4	475	\$3,990.00	L110	RSS
3/14/2014	Review DOJ productions.	4.7	125	\$587.50	L140	AE
3/14/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	9.5	550	\$5,225.00	L210	ЈТК
3/14/2014	Review documents produced to DOJ and translations for purpose of amending complaint	7.4	375	\$2,775.00	L140	JAL
3/14/2014	Management of review and coding. Review of coding results.	8.2	475	\$3,895.00	L110	RSS
3/15/2014	Management of review and coding. Review of coding results.	2.5	475	\$1,187.50	L110	RSS
3/17/2014	Review DOJ productions.	6	125	\$750.00	L140	AE
3/17/2014	Analyze and edit amended complaint.	2.3	700	\$1,610.00	L210	JDF
3/17/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	9.5	550	\$5,225.00	L210	JTK
3/17/2014	Review documents produced to DOJ and translations for purpose of amending complaint	11.3	375	\$4,237.50	L140	JAL
3/17/2014	Management of review and coding. Review of coding results. Call with counsel for direct purchaser plaintiffs re coordination on Japanese language	8.6	475	\$4,085.00	L110	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	review.					
3/18/2014	Office conference re second amended complaint.	1	800	\$800.00	L120	SWB
3/18/2014	Review DOJ productions.	7	125	\$875.00	L140	AE
3/18/2014	Analyze and edit amended complaint.	2.5	700	\$1,750.00	L210	JDF
3/18/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	9	550	\$4,950.00	L210	ЈТК
3/18/2014	Review documents produced to DOJ and translations for purpose of amending complaint	11.3	375	\$4,237.50	L140	JAL
3/18/2014	Downloaded American Subs from Catalyst and saved in shared folder. Formatting the American Subs report and saved in shared folder.	1	150	\$150.00	L140	CL
3/18/2014	Email to co-counsel re Korean language translations; Meet with translators re same.	1	650	\$650.00	L140	GWS
3/18/2014	Management of review and coding. Review of coding results.	7.9	475	\$3,752.50	L110	RSS
3/19/2014	Proofed Amended Complaint.	4	250	\$1,000.00	L210	JSD
3/19/2014	Analyze and edit amended complaint.	2.3	700	\$1,610.00	L210	JDF
3/19/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet; draft section of complaint regarding DOJ guilty pleas subsequent to filing of last complaint; analysis related materials in criminal case dockets to reference in complaint.	9.8	550	\$5,390.00	L210	JTK
3/19/2014	Review documents produced to DOJ and translations for purpose of amending complaint	12	375	\$4,500.00	L140	JAL
3/19/2014	Renamed rough translation documents and saved in shared folder; Export reports from Catalyst; Format same and send to Ms. Spiegel.	5.5	150	\$825.00	L140	CL
3/19/2014	Review draft amended complaint.	1	250	\$250.00	L140	BRM
3/19/2014	Management of review and coding. Review of coding results.	8.9	475	\$4,227.50	L110	RSS
3/20/2014	Proofed Amended Complaint.	6	250	\$1,500.00	L210	JSD
3/20/2014	Review documents; Meet with Ms. Spiegel; Research and collect hot documents; Revise document descriptions.	9	125	\$1,125.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/20/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	8.3	550	\$4,565.00	L210	JTK
3/20/2014	Review documents produced to DOJ and translations for purpose of amending complaint	11.6	375	\$4,350.00	L140	JAL
3/20/2014	Management of review and coding. Review of coding results. Consolidation of facts for amended complaint.	9.7	475	\$4,607.50	L110	RSS
3/21/2014	Email re complaint and second amended complaint.	0.5	800	\$400.00	L120	SWB
3/21/2014	Proofed Amended Complaint.	6	250	\$1,500.00	L210	JSD
3/21/2014	Research and collect hot documents for use in amended complaint.	7.5	125	\$937.50	L140	AE
3/21/2014	Analyze and edit amended complaint.	4.3	700	\$3,010.00	L210	JDF
3/21/2014	Continue analysis of latest spreadsheet of materials located to date by document reviewers for possible use in drafting amended complaint; continue analysis of latest memorandums summarizing same; continue researching and drafting process for amended complaint based on results contained in spreadsheet.	10.2	550	\$5,610.00	L210	ЈТК
3/21/2014	Review documents produced to DOJ and translations for purpose of amending complaint	8	375	\$3,000.00	L140	JAL
3/21/2014	Management of review and coding. Review of coding results. Consolidation of facts for amended complaint.	9.5	475	\$4,512.50	L110	RSS
3/22/2014	Management of review and coding. Review of coding results. Consolidation of facts for amended complaint.	9.5	475	\$4,512.50	L110	RSS
3/23/2014	Review documents produced to DOJ and translations for purpose of amending complaint	2	375	\$750.00	L140	JAL
3/24/2014	Proofed Amended Complaint.	8	250	\$2,000.00	L210	JSD
3/24/2014	Summarize Japanese documents; Fact check documents cited in draft SAC.	8.2	125	\$1,025.00	L140	AE
3/24/2014	Analyze and edit amended complaint.	4.8	700	\$3,360.00	L210	JDF
3/24/2014	Continue researching and drafting process for amended complaint due this week; numerous emails among drafting team re corrections to certain items by translators.	9.7	550	\$5,335.00	L210	ЈТК
3/24/2014	Review documents produced to DOJ and translations for purpose of amending complaint	10.8	375	\$4,050.00	L140	JAL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/24/2014	Meeting; Pull LG Chem and Samsung documents from Catalyst and save to a zip file.	1.8	150	\$270.00	L140	CL
3/24/2014	Assist with preparation of consolidated amended complaint.	6.2	250	\$1,550.00	L210	BRM
3/24/2014	Management of review and coding. Review of coding results. Consolidation of facts for amended complaint.	10.5	475	\$4,987.50	L110	RSS
3/25/2014	Work on second amended complaint.	2	800	\$1,600.00	L210	SWB
3/25/2014	Fact check documents cited in draft SAC.	7.8	125	\$975.00	L140	AE
3/25/2014	Analyze and edit amended complaint.	5.5	700	\$3,850.00	L210	JDF
3/25/2014	Continue researching and drafting process for amended complaint due Wednesday this week.	8.7	550	\$4,785.00	L210	JTK
3/25/2014	Review documents produced to DOJ and translations for purpose of amending complaint	8.3	375	\$3,112.50	L140	JAL
3/25/2014	Add LG Chem and Samsung documents to the master exhibit list; Pull LCG- MDL cited documents and send to Mr. Friedman and Mr. King.	3.5	150	\$525.00	L140	CL
3/25/2014	Assist with preparation of consolidated amended complaint.	10	250	\$2,500.00	L210	BRM
3/25/2014	Management of review and coding. Review of coding results. Consolidation of facts for amended complaint. Editing draft of amended complaint.	9.5	475	\$4,512.50	L110	RSS
3/26/2014	Work on complaint.	2	800	\$1,600.00	L210	SWB
3/26/2014	Proofed Amended Complaint and efiled it.	8	250	\$2,000.00	L210	JSD
3/26/2014	Review documents for inclusion in SAC.	0.3	125	\$37.50	L140	AE
3/26/2014	Analyze and edit amended complaint.	5.5	700	\$3,850.00	L210	JDF
3/26/2014	Final steps in drafting and editing process for amended complaint due today; numerous emails among co-counsel re same; final incorporation of all edits / comments from co-counsel re same; coordination with paralegals re filing today; review and edit draft administrative motion to file complaint until seal; analysis proposed redactions re same from paralegals; edits re same.	9	550	\$4,950.00	L210	ЈТК
3/26/2014	Add list of documents and info to the master exhibit chart.	5.7	150	\$855.00	L140	CL
3/26/2014	Assist with preparation of amended complaint.	8.5	250	\$2,125.00	L210	BRM
3/26/2014	Management of review and coding. Review of coding results. Consolidation of facts for amended complaint. Editing draft of amended complaint.	8.5	475	\$4,037.50	L110	RSS
3/27/2014	Prepared redlined version of the amended complaint; transmitted redlined version of the complaint to the court and defense counsel; transmitted proposed order to the court.	4	250	\$1,000.00	L210	JSD
3/27/2014	Attn. complaint and motion to dismiss.	4.5	700	\$3,150.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/27/2014	Administrative emails re status of chambers copies to court re yesterday's filing; emails re noting exact status of document review at time of filing complaint yesterday in case we need to describe it in seeking leave to amend complaint again; analyze R. Spiegel's draft revised coding field for continuing document review; draft response to same; attention to issues re redlined complaint we need to deliver to court per order comparing last complaint to this complaint; coordinate with paralegals re same.	1	550	\$550.00	L210	JTK
3/27/2014	Review and compare complaint drafts; update case file.	3.2	250	\$800.00	L140	BRM
3/27/2014	Management of review and coding. Preparing for next stage of review.	9.5	475	\$4,512.50	L110	RSS
3/28/2014	Analyze new 7th Circuit opinion on FTAIA issues for applicability to Batteries case; discussion with J. Friedman re same.	0.4	550	\$220.00	L120	JTK
3/28/2014	Fill in missing fields in the master exhibit chart.	5	150	\$750.00	L140	CL
3/28/2014	Management of review and coding.	6.1	475	\$2,897.50	L110	RSS
3/31/2014	Update master exhibit chart.	8	150	\$1,200.00	L140	CL
3/31/2014	Management of review and coding.	8.2	475	\$3,895.00	L110	RSS
4/1/2014	Attn. opposition to motion to dismiss.	3	700	\$2,100.00	L210	JDF
4/1/2014	Analyze draft opposition to supplemental motion to dismiss IPP complaint; research and draft edits to same; several emails among IPP case team re status of setting next ESI meet/confer call with defense counsel.	1	550	\$550.00	L210	ЈТК
4/1/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database.	7	475	\$3,325.00	L140	RSS
4/2/2014	Review opposition to motion to dismiss.	1	800	\$800.00	L210	SWB
4/2/2014	Attn. opposition to motion to dismiss.	4.5	700	\$3,150.00	L210	JDF
4/2/2014	Analyze J. Friedman's edits to opposition to supplemental motion to dismiss IPP complaint; emails with him re same; research on additional points to include draft edits to brief re same; additional emails with J. Friedman re same; email from Robbins Geller co-counsel additional email from them internal communications regarding preparation corrected complaint re same.	2.5	550	\$1,375.00	L210	JTK
4/2/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database.	9.3	475	\$4,417.50	L140	RSS
4/3/2014	Formatted and proofed corrected complaint.	1	250	\$250.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/3/2014	Edit and analyze discovery issues.	2.8	700	\$1,960.00	L140	JDF
4/3/2014	Email from paralegal re defendants' overdue on filing declaration to establish justification to keep new complaint under seal; research on local rules re same; internal case team communications re same; research and draft email to defense counsel re same; internal case team communications re defendants' response to same; review new draft of proposed corrected version of new complaint correcting co-counsel and certain plaintiff description information; email to Robbins Kaplan firm re same; analysis of new draft document from R. Spiegel re proposed modification to document review protocol moving forward; emails re setting teleconference re same; analyze Cotchett firm edits to our proposed edits on draft opposition to supplemental motion to dismiss IPP complaint.	2.5	550	\$1,375.00	L120	JTK
4/3/2014	Review defendant correspondence regarding sealed materials; update case file.	2.1	250	\$525.00	L140	BRM
4/3/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database.	8.1	475	\$3,847.50	L140	RSS
4/4/2014	Analyze and edit opposition to motion to dismiss.	2.5	700	\$1,750.00	L210	JDF
4/4/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	9.2	475	\$4,370.00	L140	RSS
4/7/2014	Analyze and edit opposition to motion to dismiss.	1.2	700	\$840.00	L210	JDF
4/7/2014	Analyze penultimate draft of opposition to supplemental motion to dismiss; analyze new Ninth Circuit case relevant to same on issue draft insert for brief re same; emails among case team re including same; emails re final draft of brief and filing same.	0.8	550	\$440.00	L210	JTK
4/7/2014	Create excel documents for Ms. Spiegel and sort data alphabetically.	0.5	150	\$75.00	L140	CL
4/7/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	8.4	475	\$3,990.00	L140	RSS
4/8/2014	Proofed corrected complaint.	1	250	\$250.00	L210	JSD
4/8/2014	Attn. complaint; sealing.	2.3	700	\$1,610.00	L210	JDF
4/8/2014	Analyze court's new order denying administrative motion to file under seal operative complaint; communications with case team re procedure to now file corrected amended complaint in public docket after getting approval and/or stipulation from defense counsel to file corrected complaint with minor administrative corrections.	0.5	550	\$275.00	L210	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/8/2014	Assist with preparation of corrected complaint.	3	250	\$750.00	L210	BRM
4/8/2014	Review opposition to motion to dismiss complaint; email to co-counsel.	1.3	650	\$845.00	L210	GWS
4/8/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	5.1	475	\$2,422.50	L140	RSS
4/9/2014	Draft coding manual. Review of Catalyst productions and work product.	8.4	475	\$3,990.00	L140	RSS
4/10/2014	Formatted and proofed stipulation to correct complaint and efiled the same.	1	250	\$250.00	L210	JSD
4/10/2014	Internal communications re status of filing corrected amended complaint; analysis of court clerk message that we need to obtain stipulation from defense counsel re same; research / draft edits to paralegal's first draft of stipulation re same; internal communications re final approval to send to defense counsel; draft email to defense counsel requesting assent to same; receive / respond to several emails from defense counsel re assent to same.	1	550	\$550.00	L120	JTK
4/10/2014	Assist with preparation of stipulation.	2	250	\$500.00	L140	BRM
4/10/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	8.2	475	\$3,895.00	L140	RSS
4/11/2014	Coordinated with the judge's clerk re issuance of order granting stipulation to file corrected complaint; Efiled Corrected Complaint.	1.5	250	\$375.00	L210	JSD
4/11/2014	Analyze additional assents from defense counsel to file stipulation discussed in yesterday's time entry; draft email to defense counsel re final approval needed from last defendant; review email from defense counsel re same; draft email to defense counsel re affirming stipulation to be filed today; communication with paralegal re status of alerting court clerk that stipulation is ready for court signature today; call from paralegal re same; several emails re status of same.	0.8	550	\$440.00	L120	ЈТК
4/11/2014	Review amended complaint.	1.3	650	\$845.00	L210	GWS
4/11/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	7.9	475	\$3,752.50	L140	RSS
4/12/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	2.6	475	\$1,235.00	L140	RSS
4/18/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	8.5	475	\$4,037.50	L140	RSS
4/22/2014	Draft coding sheet and draft review manual; organize plans for review and manage document database. Plan for merits review.	7.5	475	\$3,562.50	L140	RSS
4/23/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	9.1	475	\$4,322.50	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/24/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	9.2	475	\$4,370.00	L140	RSS
4/25/2014	Review motions to dismiss.	3.3	650	\$2,145.00	L210	GWS
4/25/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	4	475	\$1,900.00	L140	RSS
4/26/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	3.1	475	\$1,472.50	L140	RSS
4/28/2014	Per J. Friedman, analysis of 8 new motions to dismiss filed Friday; draft proposed plan on how to divide responses up, and summary of motions and common issues in same; emails among me, S. Berman, J. Friedman re logistics of dividing up same.	4.5	550	\$2,475.00	L250	ЈТК
4/28/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	7.1	475	\$3,372.50	L140	RSS
4/29/2014	Attention to continued issues regarding dividing up drafting responsibilities to respond to 7 new motions to dismiss IPP claims; email from / to Cotchett firm re varying proposals re same; internal communications re responding to same and setting call to discuss same.	0.3	550	\$165.00	L250	ЈТК
4/29/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	6	475	\$2,850.00	L140	RSS
4/30/2014	Draft coding sheet; draft coding manual. Prepare for next phase of review.	8.1	475	\$3,847.50	L140	RSS
5/1/2014	Telephone conference with co-leads re to do.	0.5	800	\$400.00	L120	SWB
5/1/2014	Emails among internal case team re preparing for today's call with IPP co- leads re division of briefing assignments for opposing motions to dismiss; participate in call with co-leads re same; research and draft communication to all Executive Committee firms assigning specific motions for each one to take first cut at drafting opposition; emails among co-leads re approval of same.	1.5	550	\$825.00	L210	JTK
5/1/2014	Print LGC translation documents for Ms. Spiegel.	3	150	\$450.00	L390	CL
5/1/2014	Draft coding sheet and review manual. Planning for review. Overall management and organization of review and Catalyst database.	7.9	475	\$3,752.50	L140	RSS
5/2/2014	Emails to six Executive Committee firms regarding their assignments to first draft of opposing particular motions to dismiss; emails from / to several of them regarding acceptance of assignments and initial questions.	0.4	550	\$220.00	L210	ЈТК
5/2/2014	Create Cast of Characters and send to Ms. Spiegel; Format excel native files; Print LGC and SDI translation documents for Ms. Spiegel.	6	150	\$900.00	L390	CL
5/2/2014	Planning for review. Overall management and organization of review and Catalyst database.	9.5	475	\$4,512.50	L140	RSS
5/3/2014	Planning for review. Overall management and organization of review and Catalyst database.	2.4	475	\$1,140.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/4/2014	Overall management and organization of review and Catalyst database.	2.5	475	\$1,187.50	L140	RSS
5/5/2014	Emails re hearing on motions to dismiss.	0.3	800	\$240.00	L120	SWB
5/5/2014	Emails with several Executive Committee firms re their acceptance of briefing assignments; draft email to IPP co-leads regarding issue on arguing at upcoming hearing that discovery should commence now.	0.3	550	\$165.00	L210	ЈТК
5/5/2014	Team meeting.	0.5	150	\$75.00	L390	CL
5/5/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	9	475	\$4,275.00	L140	RSS
5/6/2014	Emails with IPP co-leads re status of Executive Committee firms working on draft opposition to MTD briefs; several emails setting possible times for ESI meet/confer with defense counsel.	0.4	550	\$220.00	L210	ЈТК
5/6/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	7.9	475	\$3,752.50	L140	RSS
5/7/2014	Emails among IPP co-leads re how to divide up responding to questions from Ex Committee firms re briefing oppositions to motions to dismiss; emails with Lesley Weaver re time to discuss same.	0.2	550	\$110.00	L210	ЈТК
5/7/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	9.5	475	\$4,512.50	L140	RSS
5/8/2014	Call with Ex Committee firm attorney Lesley Weaver re her questions on her firm's briefing assignment re opposition an individual MTD.	0.3	550	\$165.00	L210	JTK
5/8/2014	Create spreadsheet of List of Key Terms for Ms. Spiegel.	0.3	150	\$45.00	L140	CL
5/8/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	10	475	\$4,750.00	L140	RSS
5/9/2014	Attend hearing on motion to dismiss.	4	800	\$3,200.00	L230	SWB
5/9/2014	Attended hearing on motions to dismiss; meeting re hearing.	3.5	700	\$2,450.00	L230	JDF
5/9/2014	Review written questions from Chris Cormier of Ex Committee firm Cohen Milstein on his briefing assignment to oppose motion to dismiss from GS Yuasa; research on relevant information to respond him; email him with potentially helpful materials.	0.3	550	\$165.00	L210	ЈТК
5/9/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	5.5	475	\$2,612.50	L140	RSS
5/12/2014	Prepare for and participate in conference call with DPP and IPP co-lead firms on strategy to meld six sets of opposition briefs to various individual defendants' motions to dismiss; several emails setting call, and several emails	0.6	550	\$330.00	L210	ЈТК

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	after call memorizing agreement.					
5/12/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	8.9	475	\$4,227.50	L140	RSS
5/13/2014	Research on new question from Chris Cormier on drafting GS Yuasa MTD opposition brief emails to Chris with research on same.	0.5	550	\$275.00	L210	ЈТК
5/13/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	5	475	\$2,375.00	L140	RSS
5/14/2014	Analysis of first five draft opposition briefs re MTDs received from Executive Committee firms; emails from DPPs and IPPs and to them re same and status of remaining briefs; analysis of initial overlapping briefs sent by DPPs; research and draft analysis of issues needing harmonization.	2.5	550	\$1,375.00	L210	JTK
5/14/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	5.5	475	\$2,612.50	L140	RSS
5/15/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	9.5	475	\$4,512.50	L140	RSS
5/16/2014	Numerous emails with IPP and DPP co-lead firms on issues re merging drafts of six oppositions to motions to dismiss; communicate with various IPP Executive Committee firms on status of remaining briefs.	0.5	550	\$275.00	L210	ЈТК
5/16/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	9	475	\$4,275.00	L140	RSS
5/19/2014	Numerous emails from IPP and DPP co-leads, and certain IPP Executive Committee firms, re process of merging draft oppositions to six motions to dismiss; analysis of new merged briefs sent by DPPs.	0.7	550	\$385.00	L210	ЈТК
5/19/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	7.9	475	\$3,752.50	L140	RSS
5/20/2014	Prepare for and participate in ESI protocol meet/confer with DPP and IPP co- leads; draft brief report re same to J. Friedman; continue analysis of newly merged opposition briefs to six motions to dismiss in process; emails among co-lead firms re status of same.	1	550	\$550.00	L210	JTK
5/20/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	6.5	475	\$3,087.50	L140	RSS
5/21/2014	Analysis of new drafts from DPPs of merged IPP and DPP opp. briefs re Toshiba and GS Yuasa motions to dismiss.	0.4	550	\$220.00	L210	JTK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/21/2014	Review of pleadings.	1	475	\$475.00	L210	RSS
5/22/2014	Edit and analyze discovery issues.	2	700	\$1,400.00	L390	JDF
5/22/2014	Call with Lin Chan of Lieff re who will serve as IPP point person to coordinate final edits to merged DPP and IPP opposition briefs for MTDs; emails re same; analysis of two new drafts re same from DPPs.	0.3	550	\$165.00	L210	JTK
5/23/2014	Research and draft merged opposition brief from DPPs and IPP's re opposition to Sanyo / Panasonic motion to dismiss; communications with DPP and IPP co-leads re status of all six merged briefs and final steps prior to filing next week.	5.7	550	\$3,135.00	L210	ЈТК
5/26/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	9.1	475	\$4,322.50	L140	RSS
5/27/2014	Review and edit opposition to motions to dismiss.	3.5	700	\$2,450.00	L210	JDF
5/27/2014	Analysis of approximately 40 emails from last two days with various revised drafts of six merged opposition briefs, and numerous questions / comments re same.	0.5	550	\$275.00	L210	ЈТК
5/27/2014	Review oppositions to motions to dismiss.	2.3	650	\$1,495.00	L210	GWS
5/27/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	8.7	475	\$4,132.50	L140	RSS
5/27/2014	Review class action complaint.	4.8	425	\$2,040.00	L210	AYS
5/28/2014	Download and create attorney working set of motions to dismiss.	1.6	250	\$400.00	L140	BRM
5/28/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	9.5	475	\$4,512.50	L140	RSS
5/29/2014	Located and pulled documents for AS.	2.5	250	\$625.00	L100	JSD
5/29/2014	Emails to Alex Su re recommend reading materials to get up to speed and join case team.	0.1	550	\$55.00	L120	JTK
5/29/2014	Catalyst training.	1	150	\$150.00	L140	CL
5/29/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	10	475	\$4,750.00	L140	RSS
5/29/2014	Review complaint and other pleadings.	2.5	425	\$1,062.50	L210	AYS
5/30/2014	Review management and planning. Draft manual and materials. Consult with co-counsel re plan for coding.	10	475	\$4,750.00	L140	RSS
5/30/2014	Review pleadings and court order granting defendants' motion to dismiss.	2.8	425	\$1,190.00	L210	AYS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/2/2014	Management of Catalyst database, review teams, coding, and overall evidence collection charts and plan. Communications with co-counsel re review plan. Draft translation protocol for IPP/DPP cooperation.	8.3	475	\$3,942.50	L120	RSS
6/2/2014	Review pleadings to gain understanding of case.	4	425	\$1,700.00	L120	AYS
6/3/2014	Management of Catalyst database, review teams, coding, and overall evidence collection charts and plan. Communications with co-counsel re review plan. Draft translation protocol for IPP/DPP cooperation.	7.2	475	\$3,420.00	L120	RSS
6/4/2014	Review materials in preparation for next phase of document review-8.4. Conference call regarding document review database, and document review issues and protocol-1.5.	9.9	375	\$3,712.50	L140	JAL
6/4/2014	Management of Catalyst database, review teams, coding, and overall evidence collection charts and plan. Communications with co-counsel re review plan. Draft translation protocol for IPP/DPP cooperation. Led batteries training call for reviewers.	7.1	475	\$3,372.50	L120	RSS
6/5/2014	Participate telephonic meet/confer with defense counsel and IPP / DPP counsel on resolving issues re draft ESI protocol; draft call report for J. Friedman.	1.5	550	\$825.00	L190	JTK
6/5/2014	Review materials in preparation for next phase of document review-2.4. Emails regarding document review coding procedures and coding database- 2. Document Review-Review and code for liability documents-4.4.	8.8	375	\$3,300.00	L140	JAL
6/5/2014	Conference call regarding deposition protocol.	1.5	425	\$637.50	L300	AYS
6/6/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	2.7	375	\$1,012.50	L140	JAL
6/6/2014	QC of database and review team. Management of Catalyst database, review teams, coding, and overall evidence collection charts and plan. Communications with co-counsel re review plan. Draft translation protocol for IPP/DPP cooperation.	8.1	475	\$3,847.50	L120	RSS
6/9/2014	Emails regarding document review coding procedures and database functions9. Review documents produced to DOJ and translations; code for liability per reviewer protocol -8.1.	9	375	\$3,375.00	L140	JAL
6/9/2014	Phone call with DPPs re translation protocol. Management of Catalyst database, review teams, coding, and overall evidence collection charts and plan. Communications with co-counsel re review plan. Draft translation protocol for IPP/DPP cooperation.	7.1	475	\$3,372.50	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/10/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	8.4	375	\$3,150.00	L140	JAL
6/11/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	4.1	375	\$1,537.50	L140	JAL
6/11/2014	Draft translation protocol for IPP/DPP cooperation. Management of database and review team.	8	475	\$3,800.00	L120	RSS
6/12/2014	Edit and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
6/12/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9	375	\$3,375.00	L140	JAL
6/12/2014	Draft translation protocol. Answer questions from reviewers.	7.1	475	\$3,372.50	L120	RSS
6/13/2014	Analyze draft discovery dispute letter from IPP counsel; research and draft additions various emails among IPP counsel resolving these and other edits.	1.1	550	\$605.00	L190	ЈТК
6/13/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1.3	375	\$487.50	L140	JAL
6/13/2014	Led training call for new reviewers. Preparation for training call.	2	475	\$950.00	L120	RSS
6/16/2014	Attn. discovery letter.	2.5	700	\$1,750.00	L390	JDF
6/16/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	0.7	375	\$262.50	L140	JAL
6/16/2014	Check work of review team.	1.1	475	\$522.50	L120	RSS
6/17/2014	Edit and analyze discovery issues.	2.3	700	\$1,610.00	L300	JDF
6/17/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.4	375	\$2,775.00	L140	JAL
6/17/2014	Update case file; review and organize motion to dismiss reply briefing.	2	250	\$500.00	L140	BRM
6/17/2014	Review replies in support of motions to dismiss by individual defendants.	1.8	650	\$1,170.00	L210	GWS
6/17/2014	Review and QC review team work product.	1.3	475	\$617.50	L120	RSS
6/18/2014	Reviewed docket and judge's standing order; calendared due dates.	1.25	250	\$312.50	L100	JSD
6/18/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	2.4	375	\$900.00	L140	JAL
6/18/2014	Update case file.	1.3	250	\$325.00	L140	BRM
6/18/2014	Review additional reply motions filed by defendants.	1.5	650	\$975.00	L210	GWS
6/18/2014	Overall planning and management of database and review team. Answer questions from reviewers and co-counsel re coding and review.	5	475	\$2,375.00	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/19/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9	375	\$3,375.00	L140	JAL
6/20/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	2.4	375	\$900.00	L140	JAL
6/23/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9.3	375	\$3,487.50	L140	JAL
6/24/2014	Manage review. Answer questions from review team.	1.5	475	\$712.50	L120	RSS
6/25/2014	Edit and analyze discovery issues.	4.5	700	\$3,150.00	L300	JDF
6/25/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5.1	375	\$1,912.50	L140	JAL
6/25/2014	Overall planning and management of database and review team. Answer questions from reviewers and co-counsel re coding and review.	4.4	475	\$2,090.00	L120	RSS
6/26/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.5	375	\$1,312.50	L140	JAL
6/27/2014	Edit and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
6/27/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.6	375	\$1,350.00	L140	JAL
6/27/2014	Overall planning and management of database and review team. Answer questions from reviewers and co-counsel re coding and review.	5.9	475	\$2,802.50	L120	RSS
6/28/2014	Respond to reviewer questions.	1	475	\$475.00	L120	RSS
6/30/2014	Merge edits for translation protocol. QC of review team.	7.2	475	\$3,420.00	L120	RSS
6/30/2014	Read and review order regarding motion to dismiss and second amended complaint.	1.8	425	\$765.00	L120	AYS
7/1/2014	Document Review-Review and code for liability documents-7.1. Conference call regarding document review9. Transcribe notes from said conference call6. Emails regarding document review protocol5.	9.1	375	\$3,412.50	L140	JAL
7/1/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	5.3	475	\$2,517.50	L110	RSS
7/2/2014	Edit and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
7/2/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.4	375	\$1,275.00	L140	JAL
7/2/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	1	475	\$475.00	L110	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/3/2014	Document Review-Review and code for liability documents-3.6. Review updates to document review manual and summary of conference call regarding document review on 07/01/20142. Draft memo regarding documents reviewed9.	4.7	375	\$1,762.50	L140	JAL
7/3/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	1	475	\$475.00	L110	RSS
7/7/2014	Document Review-Review and code for liability documents-6.7. Draft memos regarding documents reviewed-1.9.	8.6	375	\$3,225.00	L140	JAL
7/8/2014	Review discovery dispute letters.	2.25	700	\$1,575.00	L200	JDF
7/8/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	7.4	475	\$3,515.00	L110	RSS
7/9/2014	Document Review-Review and code for liability documents-8.5. Draft memos regarding documents reviewed4.	8.9	375	\$3,337.50	L140	JAL
7/9/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	1.1	475	\$522.50	L110	RSS
7/10/2014	Prepare for and attend hearing on discovery disputes before Magistrate Judge Ryu.	2.5	700	\$1,750.00	L450	JDF
7/10/2014	Prepare for and attend hearing on discovery disputes before Magistrate Judge Ryu. Confer with plaintiffs' counsel re same.	5.25	600	\$3,150.00	L450	SES
7/10/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	8	475	\$3,800.00	L110	RSS
7/10/2014	Consolidate notes and summarize hearing to send to the rest of the team.	2	425	\$850.00	L120	AYS
7/10/2014	Prepare for and attend discovery hearing before Magistrate Judge Ryu.	6.2	425	\$2,635.00	L120	AYS
7/11/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.1	375	\$1,162.50	L140	JAL
7/11/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	7.5	475	\$3,562.50	L110	RSS
7/12/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	2.2	475	\$1,045.00	L110	RSS
7/14/2014	Calendared hearing and due dates and cleaned up calendar.	0.5	250	\$125.00	L140	JSD
7/14/2014	Document Review-Review and code for liability documents-6.3. Draft memos regarding documents reviewed9.	7.2	375	\$2,700.00	L140	JAL
7/15/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	8.1	475	\$3,847.50	L110	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/16/2014	Document Review-Review and code for liability documents-7.8. Draft memo regarding documents reviewed2.	8	375	\$3,000.00	L140	JAL
7/16/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	1.5	475	\$712.50	L110	RSS
7/17/2014	Call re discovery.	1.5	700	\$1,050.00	L300	JDF
7/17/2014	Draft memos regarding documents reviewed.	2.7	375	\$1,012.50	L140	JAL
7/17/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	9	475	\$4,275.00	L110	RSS
7/18/2014	Document Review-Review and code for liability documents-2. Draft memos regarding documents reviewed9.	2.9	375	\$1,087.50	L140	JAL
7/18/2014	Call with plaintiffs' counsel regarding discovery matters.	0.5	600	\$300.00	L300	SES
7/18/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	9.5	475	\$4,512.50	L110	RSS
7/19/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	1.2	475	\$570.00	L110	RSS
7/21/2014	Document Review-Review and code for liability documents-8.3. Draft memos regarding documents reviewed5.	8.8	375	\$3,300.00	L140	JAL
7/21/2014	Assist attorneys with pleadings review re motions to dismiss.	2.4	250	\$600.00	L140	BRM
7/21/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	6.5	475	\$3,087.50	L110	RSS
7/22/2014	Reviewed docket and cleaned up calendar.	1.75	250	\$437.50	L140	JSD
7/22/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	5.7	475	\$2,707.50	L110	RSS
7/23/2014	Attn. discovery protocols.	2.25	700	\$1,575.00	L300	JDF
7/23/2014	Document Review-Review and code for liability documents-5.6. Draft memos regarding documents reviewed-2. Email regarding document review protocols4.	8	375	\$3,000.00	L140	JAL
7/23/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	8.5	475	\$4,037.50	L110	RSS
7/24/2014	Review documents for evidence of conspiracy involving defendant NEC.	2.2	375	\$825.00	L140	JAL
7/24/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	7.9	475	\$3,752.50	L110	RSS
7/25/2014	Edit and analyze discovery issues.	3.75	700	\$2,625.00	L300	JDF
7/25/2014	Review documents for evidence of conspiracy involving defendant NEC.	1.9	375	\$712.50	L140	JAL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/25/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	5.6	475	\$2,660.00	L110	RSS
7/28/2014	Prepare for motion to dismiss hearing.	3.5	700	\$2,450.00	L280	JDF
7/28/2014	Review documents for evidence of conspiracy involving defendant NEC.	8.3	375	\$3,112.50	L140	JAL
7/28/2014	Call with Foreign Defendants regarding ESI checklist and transactional data.	1	600	\$600.00	L300	SES
7/28/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	2	475	\$950.00	L110	RSS
7/28/2014	Review documents related to potential requests for production.	2.4	425	\$1,020.00	L120	AYS
7/29/2014	Prepare for motion to dismiss hearing.	3.5	700	\$2,450.00	L450	JDF
7/29/2014	Review documents for evidence of conspiracy involving defendant NEC.	10.8	375	\$4,050.00	L140	JAL
7/29/2014	Assist with hearing preparation.	2	250	\$500.00	L140	BRM
7/29/2014	Edit deposition protocol; edit requests for production of documents, set two (transactional data); telephone conversation with AMS of Pearson Simon regarding transactional requests; send email to IPP counsel re same.	3.75	600	\$2,250.00	L300	SES
7/29/2014	Conference call with review management team. Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	8	475	\$3,800.00	L110	RSS
7/30/2014	Prepare re hearing; discovery.	4.5	700	\$3,150.00	L350	JDF
7/30/2014	Management of document review and coding process. Fielding questions from reviewers. Organizing and updating fact collection charts.	7.5	475	\$3,562.50	L110	RSS
7/30/2014	Review discovery briefs, complaint, and other background documents.	2	425	\$850.00	L120	AYS
7/31/2014	Prepare for motion to dismiss hearing.	3.5	700	\$2,450.00	L240	JDF
7/31/2014	Review documents for evidence of conspiracy involving defendant NEC.	5.4	375	\$2,025.00	L140	JAL
7/31/2014	Report on coding and response to emails re coding process from Jeff Friedman.	4	475	\$1,900.00	L110	RSS
8/1/2014	Formatted and proofed request for production of documents; reviewed rules on sequential numbering of request.	2.5	250	\$625.00	L300	JSD
8/1/2014	Prepare for motion to dismiss hearing.	3.2	700	\$2,240.00	L230	JDF
8/1/2014	Document Review-Review and code for documents regarding evidencing of conspiracy involving defendant NEC-2. Email regarding document review protocol5.	2.5	375	\$937.50	L140	JAL
8/1/2014	Edit letter to defendants re production of transactional data. Email and telephone conversation with AMS re same.	0.7	600	\$420.00	L311	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/1/2014	Draft requests for production of documents to defendants regarding transactional data.	2	600	\$1,200.00	L311	SES
8/1/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	8.9	475	\$4,227.50	L140	RSS
8/1/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	2	475	\$950.00	L140	RSS
8/2/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	1.5	475	\$712.50	L140	RSS
8/2/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	1	475	\$475.00	L140	RSS
8/3/2014	Checking emails and answering questions from review team members.	1.5	475	\$712.50	L120	RSS
8/4/2014	Re-formatted and proofed Second Set of RPDs.	3.5	250	\$875.00	L300	JSD
8/4/2014	Formatted and proofed first set of interrogatories.	1.5	250	\$375.00	L300	JSD
8/4/2014	Prepare for motion to dismiss hearing.	6.5	700	\$4,550.00	L230	JDF
8/4/2014	Document Review-Review and code for documents regarding evidencing of conspiracy involving defendant NEC.	8.3	375	\$3,112.50	L140	JAL
8/4/2014	Draft interrogatories to foreign defendants regarding corporate structure. Discovery Requests	1.5	600	\$900.00	L311	SES
8/4/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	9.3	475	\$4,417.50	L140	RSS
8/4/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	9.3	475	\$4,417.50	L140	RSS
8/5/2014	Formatted and proofed first set of interrogatories.	1.5	250	\$375.00	L300	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/5/2014	Prepare for motion to dismiss hearing.	4.8	700	\$3,360.00	L230	JDF
8/5/2014	Document Review-Review and code for documents regarding evidencing of conspiracy involving defendant NEC-6.3. Draft memo regarding documents found in review-1.	7.3	375	\$2,737.50	L140	JAL
8/5/2014	Create paragraph numbers of documents cited on the Complaint Cross Reference chart; Meeting; Filled in documents cited on the Complaint Cross Reference chart.	8	150	\$1,200.00	L140	CL
8/5/2014	Create discovery response charts; update case file.	3.6	250	\$900.00	L140	BRM
8/5/2014	Draft interrogatories to foreign defendants regarding corporate structure. Circulate to plaintiffs' counsel. Discovery Requests	3	600	\$1,800.00	L311	SES
8/5/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	8.4	475	\$3,990.00	L140	RSS
8/5/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	5.2	475	\$2,470.00	L140	RSS
8/6/2014	Proofed first set of interrogatories; updated service list.	1	250	\$250.00	L300	JSD
8/6/2014	Prepare for motion to dismiss hearing.	7	700	\$4,900.00	L230	JDF
8/6/2014	Document Review-Review and code for documents regarding evidencing of conspiracy involving defendant NEC-2.4. Draft memo regarding documents found in review-2.9.	5.3	375	\$1,987.50	L140	JAL
8/6/2014	Filled in footnotes cited on the Complaint Cross Reference chart.	5	150	\$750.00	L140	CL
8/6/2014	Review and answer emails from review team.	1	475	\$475.00	L120	RSS
8/7/2014	Prepare for motion to dismiss hearing.	7.2	700	\$5,040.00	L230	JDF
8/7/2014	Document Review-Review and code for documents regarding evidencing of conspiracy involving defendant NEC.	5.3	375	\$1,987.50	L140	JAL
8/7/2014	Management of review team. Answering questions from review team. Review of metrics and progress re review and coding.	2	475	\$950.00	L140	RSS
8/8/2014	Attend motion to dismiss hearing.	5	700	\$3,500.00	L230	JDF
8/8/2014	Filled in the descriptions in the LGC documents in the Batteries Master Translation and Exhibit chart.	6	150	\$900.00	L140	CL
8/8/2014	Attend hearing before Judge Gonzalez Rogers regarding motions to dismiss.	5	600	\$3,000.00	L230	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/8/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	10	475	\$4,750.00	L140	RSS
8/9/2014	Answering questions re review and coding.	1.4	475	\$665.00	L120	RSS
8/11/2014	Reviewed N.D. Cal. judge's standing orders (particularly J. Ryu's) re deposition objection to form; case docket.	2.25	250	\$562.50	L210	JSD
8/11/2014	Formatted joint discovery letter brief.	0.5	250	\$125.00	L300	JSD
8/11/2014	Reviewed Batteries project manual, IPP 2nd Amended Complaint, Batch memo, key player list, and key terms; logged into Catalyst and reviewed some field searches.	5	350	\$1,750.00	L140	НН
8/11/2014	Filled in the descriptions in the LGC documents in the Batteries Master Translation and Exhibit chart.	3	150	\$450.00	L140	CL
8/11/2014	Meet and confer with Batteries defendants regarding deposition protocol.	1	600	\$600.00	L390	SES
8/11/2014	Follow up call with plaintiffs' counsel regarding deposition protocol.	0.5	600	\$300.00	L390	SES
8/11/2014	Draft plaintiffs' portion of joint letter regarding disputed portion of deposition protocol.	3.5	600	\$2,100.00	L390	SES
8/11/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	9.1	475	\$4,322.50	L140	RSS
8/12/2014	Continued reviewing IPP 2nd Amended Complaint and reviewed Catalyst field searches.	2.5	350	\$875.00	L140	НН
8/12/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.2	375	\$1,200.00	L140	JAL
8/12/2014	Saved Batteries revised translation documents in shared folder.	0.3	150	\$45.00	L140	CL
8/12/2014	Draft plaintiffs' portion of joint letter regarding disputed portion of deposition protocol.	3.5	600	\$2,100.00	L390	SES
8/13/2014	Proofed, fact-checked and autocited joint deposition protocol.	3	250	\$750.00	L210	JSD
8/13/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9	375	\$3,375.00	L140	JAL
8/13/2014	Review redlines to joint letter brief regarding disputed deposition protocol. Draft email to defendants regarding schedule.	0.5	600	\$300.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/13/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence. Preparation for and participation in training call for new reviewers.	8.6	475	\$4,085.00	L140	RSS
8/14/2014	Proofed, fact-checked and autocited joint deposition protocol.	3	250	\$750.00	L210	JSD
8/14/2014	Reviewed Chinese documents in Batteries project; Catalyst training; Batteries case meeting to discuss issues such as CA contacts, FTAIA, etc.	8	350	\$2,800.00	L140	HH
8/14/2014	Team conference call.	0.8	300	\$240.00	L120	ARK
8/14/2014	Conference call regarding document review8; Document Review-Review and code for liability documents-2.7.	3.5	375	\$1,312.50	L140	JAL
8/14/2014	Draft plaintiffs' portion of joint letter regarding disputed portion of deposition protocol. Emails with plaintiffs' counsel re same. Exchange drafts with defendants.	4	600	\$2,400.00	L390	SES
8/14/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	7.2	475	\$3,420.00	L140	RSS
8/14/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	2	475	\$950.00	L140	RSS
8/15/2014	Proofed, fact-checked and autocited joint deposition protocol and Proposed Order; efiled and served the same; transmitted courtesy copy thereof.	4	250	\$1,000.00	L210	JSD
8/15/2014	Continued reviewing (includes coding and providing translation summaries) Chinese documents in Batteries project.	6	350	\$2,100.00	L140	HH
8/15/2014	Review and code Sony documents from DOJ production.	7.3	300	\$2,190.00	L140	ARK
8/15/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	4.5	375	\$1,687.50	L140	JAL
8/15/2014	Draft plaintiffs' portion of joint letter regarding disputed portion of deposition protocol. Emails with plaintiffs' counsel re same. Exchange drafts with defendants. Oversaw filing of same.	3	600	\$1,800.00	L390	SES
8/15/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for	9.4	475	\$4,465.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	collection of evidence.					
8/16/2014	Review and code Sony documents from DOJ production.	7	300	\$2,100.00	L140	ARK
8/16/2014	Review of emails. Answering questions re review and coding.	1.2	475	\$570.00	L120	RSS
8/18/2014	Review and code Sony documents from DOJ production.	4	300	\$1,200.00	L140	ARK
8/18/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	4.2	475	\$1,995.00	L140	RSS
8/19/2014	Review and code Sony documents from DOJ production.	6	300	\$1,800.00	L140	ARK
8/19/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.4	375	\$1,275.00	L140	JAL
8/20/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	8.2	375	\$3,075.00	L140	JAL
8/21/2014	Edit and analyze discovery issues.	2	700	\$1,400.00	L390	JDF
8/21/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5.4	375	\$2,025.00	L140	JAL
8/21/2014	Meet and confer with SDI re transactional data.	1	600	\$600.00	L390	SES
8/21/2014	Prepare for meet and confer with SDI; telephone call with AMS, Demetrius L. and Lin Chan re same.	0.5	600	\$300.00	L390	SES
8/22/2014	Review and code Sony documents from DOJ production.	5	300	\$1,500.00	L140	ARK
8/22/2014	Compile list of top 20 documents reviewed.	7.2	375	\$2,700.00	L140	JAL
8/22/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	4.4	475	\$2,090.00	L140	RSS
8/23/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	1.1	475	\$522.50	L140	RSS
8/24/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	2.2	475	\$1,045.00	L140	RSS
8/25/2014	Edit and analyze discovery issues.	2	700	\$1,400.00	L390	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/25/2014	Review and code Sony documents from DOJ production.	6	300	\$1,800.00	L140	ARK
8/25/2014	Saved the Batteries documents in shared folder; Compressed The Batteries final translation documents of SDI-B and sent to Nate and Thomas.	1.5	150	\$225.00	L140	CL
8/25/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	6.8	475	\$3,230.00	L140	RSS
8/26/2014	Review and code Sony documents from DOJ production.	4	300	\$1,200.00	L140	ARK
8/26/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	8.4	375	\$3,150.00	L140	JAL
8/26/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	3.8	475	\$1,805.00	L140	RSS
8/27/2014	Formatted and proofed letter to defense counsel re ESI Liaison Counsel.	1.25	250	\$312.50	L210	JSD
8/27/2014	Review and code Sony documents from DOJ production.	2	300	\$600.00	L140	ARK
8/27/2014	Meet and confer with GS Yuasa re transactional data.	1	600	\$600.00	L390	SES
8/27/2014	Meet and confer with Panasonic/Sanyo re transactional data.	1.5	600	\$900.00	L390	SES
8/27/2014	Meet and confer with Toshiba re transactional data.	1	600	\$600.00	L390	SES
8/27/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	7.7	475	\$3,657.50	L140	RSS
8/28/2014	Proofed letter to defense counsel and served the same.	1	250	\$250.00	L210	JSD
8/28/2014	Pulled letters re liaison counsel, reviewed chart re Liaison Counsel and updated the same.	1.5	250	\$375.00	L300	JSD
8/28/2014	Edit and analyze discovery issues.	4.5	700	\$3,150.00	L390	JDF
8/28/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.7	375	\$2,887.50	L140	JAL
8/28/2014	Meet and confer with LG Chem re transactional data.	1	600	\$600.00	L390	SES
8/28/2014	Meet and confer with Hitachi/Maxell re transactional data.	1	600	\$600.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/28/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence. Weekly conference call with review managers.	4.8	475	\$2,280.00	L140	RSS
8/29/2014	Transactional data discovery.	2.3	700	\$1,610.00	L140	JDF
8/29/2014	Go through hot documents and draft memo regarding hot documents reviewed-1.2. Document Review-Review and code for liability documents- 3.6.	4.8	375	\$1,800.00	L140	JAL
8/29/2014	Searched for witnesses on E-transcripts and exhibits for the Batteries and printed.	1.5	150	\$225.00	L140	CL
8/29/2014	Meet with JDF and A. Su regarding case assignments. Review master chronology. Telephone conversation with R. Spiegel re same and proposed custodian lists.	3.5	600	\$2,100.00	L120	SES
8/29/2014	Meet and confer with NEC Tokien re transactional data.	0.8	600	\$480.00	L390	SES
8/29/2014	Meet and confer with Sony re transactional data.	1	600	\$600.00	L390	SES
8/29/2014	Management and organization of document review and coding. Management and training of new reviewers, QC, and assignments. Review and analysis of evidence to date. Management of translations and overall systems for collection of evidence.	3.7	475	\$1,757.50	L140	RSS
8/29/2014	Review discovery briefs, complaint, and other background documents.	2	425	\$850.00	L210	AYS
9/1/2014	Edit requests and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
9/1/2014	Management and organization of document review team, evidence collection, and translation issues.	4.8	475	\$2,280.00	L140	RSS
9/2/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	8.1	375	\$3,037.50	L140	JAL
9/2/2014	Compressed the Batteries rough translation documents of SDI special 3.19.14 and sent to Mr. Su.	0.3	150	\$45.00	L140	CL
9/2/2014	Review and edit letters to LG Chem, and Hitachi/Maxell regarding discovery conferences on ESI and transactional data.	0.5	600	\$300.00	L300	SES
9/2/2014	Management and organization of document review team, evidence collection, and translation issues.	9	475	\$4,275.00	L120	RSS
9/2/2014	Read and study background documents relating to custodians, including document review protocol.	4	425	\$1,700.00	L120	AYS
9/2/2014	Find documents from evidence sheet and enter into custodian spreadsheet.	2.2	425	\$935.00	L120	AYS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/3/2014	Researched client plaintiffs who have sent preservation letter.	0.5	250	\$125.00	L300	JSD
9/3/2014	Meet and confer discovery.	2.3	700	\$1,610.00	L300	JDF
9/3/2014	Review a Chinese document; Email Hisun re coding criteria.	0.5	350	\$175.00	L140	HH
9/3/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1	375	\$375.00	L140	JAL
9/3/2014	Review pleadings regarding preservation issues; assist attorneys with document requests.	5	250	\$1,250.00	L140	BRM
9/3/2014	Prepare for and attend discovery conference in Batteries with all defendants regarding ESI and preservation.	1	600	\$600.00	L300	SES
9/3/2014	Management and organization of document review team, evidence collection, and translation issues.	3.6	475	\$1,710.00	L120	RSS
9/3/2014	Attend meet and confer conference call and discuss with SES afterwards.	0.8	425	\$340.00	L120	AYS
9/3/2014	Find documents from evidence sheet and enter into custodian spreadsheet.	2.7	425	\$1,147.50	L120	AYS
9/3/2014	Read and review discovery hearing transcript and discovery order in preparation for meet and confer.	2.5	425	\$1,062.50	L120	AYS
9/4/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.5	375	\$2,812.50	L140	JAL
9/4/2014	Management and organization of document review team, evidence collection, and translation issues.	7	475	\$3,325.00	L120	RSS
9/4/2014	Review, search for, and enter document bates numbers into custodian worksheet.	1.8	425	\$765.00	L120	AYS
9/5/2014	Attn case org and call.	2.3	700	\$1,610.00	L120	JDF
9/5/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.2	375	\$1,200.00	L140	JAL
9/5/2014	Management and organization of document review team, evidence collection, and translation issues.	6.4	475	\$3,040.00	L120	RSS
9/5/2014	Review, search for, and enter document bates numbers into custodian worksheet.	1.3	425	\$552.50	L120	AYS
9/6/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1	375	\$375.00	L140	JAL
9/8/2014	Attention meet and confer discovery.	1.5	700	\$1,050.00	L390	JDF
9/8/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1.5	375	\$562.50	L140	JAL
9/8/2014	Save translation documents to shared folder.	0.3	150	\$45.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/8/2014	Management and organization of document review team, evidence collection, and translation issues.	10.2	475	\$4,845.00	L120	RSS
9/9/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9.3	375	\$3,487.50	L140	JAL
9/9/2014	Team meeting.	1	150	\$150.00	L140	CL
9/9/2014	Prepare for and attend discovery conference with LG Chem regarding transactional data and ESI.	1	600	\$600.00	L300	SES
9/9/2014	Management and organization of document review team, evidence collection, and translation issues.	8.2	475	\$3,895.00	L120	RSS
9/10/2014	Management and organization of document review team, evidence collection, and translation issues.	9.2	475	\$4,370.00	L120	RSS
9/11/2014	Located and pulled documents for litigation team.	0.3	250	\$75.00	L300	JSD
9/11/2014	Formatted and proofed joint status report.	1.7	250	\$425.00	L210	JSD
9/11/2014	Draft plaintiffs' portion of Joint Status Report to Magistrate Judge Ryu.	1	600	\$600.00	L210	SES
9/11/2014	Prepare for and attend discovery conference with Toshiba regarding ESI and transactional data.	1	600	\$600.00	L300	SES
9/11/2014	Prepare for and attend discovery conference with Panasonic regarding ESI and transactional data.	1	600	\$600.00	L300	SES
9/11/2014	Prepare for and attend discovery conference with Hitachi regarding ESI and transactional data (two separate conferences).	1	600	\$600.00	L300	SES
9/15/2014	Attended to attorneys' questions and requests.	1	250	\$250.00	L300	JSD
9/15/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	4.3	375	\$1,612.50	L140	JAL
9/15/2014	Created the Batteries SDI chart and sent to Ronnie.	0.5	150	\$75.00	L140	CL
9/15/2014	Call with DL and LC regarding custodial lists.	0.3	600	\$180.00	L121	SES
9/15/2014	Draft plaintiffs' portion of Joint Status Report to Magistrate Judge Ryu.	2.3	600	\$1,380.00	L210	SES
9/15/2014	Prepare for and attend call with LG Chem regarding ESI preservation.	3	600	\$1,800.00	L121	SES
9/15/2014	Management and organization of document review team, evidence collection, and translation issues.	10.2	475	\$4,845.00	L120	RSS
9/15/2014	Catalyst training.	0.5	425	\$212.50	L120	AYS
9/15/2014	Review, search for, and enter document bates numbers into custodian worksheet.	5	425	\$2,125.00	L120	AYS
9/16/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	6.8	375	\$2,550.00	L140	JAL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/16/2014	Draft plaintiffs' portion of Joint Status Report to Magistrate Judge Ryu.	3.5	600	\$2,100.00	L210	SES
9/16/2014	Prepare for and conduct discovery conference with GS Yuasa regarding preservation of ESI.	0.5	600	\$300.00	L300	SES
9/16/2014	Prepare for and conduct discovery conference with NEC regarding preservation of ESI.	1.8	600	\$1,080.00	L300	SES
9/16/2014	Prepare for and conduct discovery conference with Toshiba regarding preservation of ESI.	1.7	600	\$1,020.00	L300	SES
9/16/2014	Management and organization of document review team, evidence collection, and translation issues.	8.9	475	\$4,227.50	L120	RSS
9/16/2014	Conversation with Shana Scarlett re prioritizing SDI custodians.	0.9	475	\$427.50	L120	RSS
9/16/2014	Prepare for, conduct, and follow up with conference calls regarding ESI.	4	425	\$1,700.00	L120	AYS
9/17/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1.1	375	\$412.50	L140	JAL
9/17/2014	Assist with status report.	2.4	250	\$600.00	L140	BRM
9/17/2014	Draft plaintiffs' portion of Joint Status Report to Magistrate Judge Ryu. Oversaw filing of same.	7.5	600	\$4,500.00	L210	SES
9/17/2014	Management and organization of document review team, evidence collection, and translation issues.	10.3	475	\$4,892.50	L120	RSS
9/17/2014	Follow up related to ESI conference call.	0.5	425	\$212.50	L120	AYS
9/17/2014	Review discovery orders.	2	425	\$850.00	L120	AYS
9/17/2014	Work on custodian chart.	3.7	425	\$1,572.50	L120	AYS
9/18/2014	Meet and confer with defendants regarding transactional data.	1.5	700	\$1,050.00	L390	JDF
9/18/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.6	375	\$2,850.00	L140	JAL
9/18/2014	Created an Excel chart of SDI Custodian List for Batteries and Sent to Ronnie; Filled in Defendants Privilege Log on the Batteries Master Cast of Characters.	2	150	\$300.00	L140	CL
9/18/2014	Management and organization of document review team, evidence collection, and translation issues.	6.1	475	\$2,897.50	L120	RSS
9/18/2014	Follow up calls regarding ESI.	1	425	\$425.00	L120	AYS
9/18/2014	Review joint motion to the court regarding status update.	1	425	\$425.00	L120	AYS
9/18/2014	Continue filling in Custodian chart.	6	425	\$2,550.00	L120	AYS
9/19/2014	Meet and confer with defendants regarding transactional data.	1.2	700	\$840.00	L390	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/19/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	0.8	375	\$300.00	L140	JAL
9/19/2014	Filled in Defendants Privilege Log on the Batteries Master Cast of Characters.	2	150	\$300.00	L140	CL
9/19/2014	Management and organization of document review team, evidence collection, and translation issues.	8.7	475	\$4,132.50	L120	RSS
9/19/2014	Continue filling in Custodians chart.	2	425	\$850.00	L120	AYS
9/20/2014	Management and organization of document review team, evidence collection, and translation issues.	2.2	475	\$1,045.00	L120	RSS
9/22/2014	Review class member product verifications; update log.	3.8	250	\$950.00	L140	BRM
9/22/2014	Review documents regarding Panasonic custodians.	0.7	600	\$420.00	L300	SES
9/22/2014	Management and organization of document review team, evidence collection, and translation issues.	9.2	475	\$4,370.00	L120	RSS
9/22/2014	Conduct training on Catalyst platform.	1	425	\$425.00	L300	AYS
9/23/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9	375	\$3,375.00	L140	JAL
9/23/2014	Management and organization of document review team, evidence collection, and translation issues.	7	475	\$3,325.00	L120	RSS
9/24/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1.2	375	\$450.00	L140	JAL
9/24/2014	Prepare for and conduct meet and confer with LG Chem regarding preservation of ESI.	0.7	600	\$420.00	L121	SES
9/24/2014	Management and organization of document review team, evidence collection, and translation issues.	8.9	475	\$4,227.50	L120	RSS
9/24/2014	Conduct training on Catalyst platform.	1	425	\$425.00	L300	AYS
9/25/2014	Formatted and proofed letter to defense counsel.	0.5	250	\$125.00	L300	JSD
9/25/2014	Edit requests and analyze discovery issues.	2.5	700	\$1,750.00	L390	JDF
9/25/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.2	375	\$2,700.00	L140	JAL
9/25/2014	Management and organization of document review team, evidence collection, and translation issues.	4.1	475	\$1,947.50	L120	RSS
9/25/2014	Follow up with Plaintiffs regarding physical documents and items.	1.5	425	\$637.50	L300	AYS
9/26/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5	375	\$1,875.00	L140	JAL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/26/2014	Call with counsel for Sony regarding ESI preservation conference scheduling.	0.3	600	\$180.00	L300	SES
9/26/2014	Management and organization of document review team, evidence collection, and translation issues.	9.5	475	\$4,512.50	L120	RSS
9/26/2014	Prepare to send out boxes for plaintiffs, prepare and write letter explaining what the box is for.	2	425	\$850.00	L300	AYS
9/26/2014	Finalize Meet and Confer Letter regarding ESI Call with LG Chem.	1	425	\$425.00	L300	AYS
9/27/2014	Management and organization of document review team, evidence collection, and translation issues.	1.5	475	\$712.50	L120	RSS
9/28/2014	Management and organization of document review team, evidence collection, and translation issues.	2.2	475	\$1,045.00	L120	RSS
9/29/2014	Proofed and fact-checked letter to counsel.	2	250	\$500.00	L300	JSD
9/29/2014	Edit requests and analyze discovery issues.	1.5	700	\$1,050.00	L300	JDF
9/29/2014	Conference call regarding project to identify SDI custodians2. In person meeting with colleague to further Discuss SDI custodian projecet3. Search documents, collect and summarize info regarding potential SDI custodians-7.	7.5	375	\$2,812.50	L140	JAL
9/29/2014	Call with DPPs re ESI preservation for plaintiffs.	0.3	600	\$180.00	L300	SES
9/29/2014	Draft letter to all defense counsel re preservation of IPP's ESI.	3.2	600	\$1,920.00	L300	SES
9/29/2014	Call with team regarding document review status and custodians for SDI.	0.5	600	\$300.00	L300	SES
9/29/2014	Management and organization of document review team, evidence collection, and translation issues.	7.9	475	\$3,752.50	L120	RSS
9/30/2014	Meeting re expert.	2.5	700	\$1,750.00	L130	JDF
9/30/2014	Conference call re coding English batches.	0.2	300	\$60.00	L140	ARK
9/30/2014	Conference call regarding document review2. Search documents, collect and summarize info regarding potential SDI custodians-11.3.	11.5	375	\$4,312.50	L140	JAL
9/30/2014	Email to Plaintiffs' counsel regarding ESI and strategy.	0.7	600	\$420.00	L300	SES
9/30/2014	Management and organization of document review team, evidence collection, and translation issues. Call for restart of review, working with reviewers on new assignments.	10.1	475	\$4,797.50	L120	RSS
10/1/2014	Proofed and fact-checked letter to counsel re ESI discovery, reviewed service list and served the same.	2.3	250	\$575.00	L300	JSD
10/1/2014	Edit requests and analyze discovery issues.	1.8	700	\$1,260.00	L300	JDF
10/1/2014	Search documents, collect and summarize info regarding potential SDI custodians.	11.2	450	\$5,040.00	L140	JAL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/1/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9	550	\$4,950.00	L140	RSS
10/2/2014	Formatted and proofed letter to defense counsel.	0.8	250	\$200.00	L210	JSD
10/2/2014	Calendared due dates.	0.5	250	\$125.00	L300	JSD
10/2/2014	Attn. expert.	1	700	\$700.00	L340	JDF
10/2/2014	Reviewed and provided translation of Batteries documents, NECT00028627, NECT00028635 and NECT00029832; Coded the documents.	1	350	\$350.00	L140	НН
10/2/2014	Search documents and master evidence spreadsheet, collect and summarize info regarding potential SDI custodians.	9.1	450	\$4,095.00	L140	JAL
10/2/2014	Review order denying motion to dismiss. Draft letter to defendants re schedule and discovery.	2.2	600	\$1,320.00	L300	SES
10/2/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8.6	550	\$4,730.00	L140	RSS
10/3/2014	Continued Reviewed and provided translation of Batteries documents, NECT00028627, NECT00028635 and NECT00029832; Coded the documents.	1	350	\$350.00	L140	НН
10/3/2014	Review and code Sony documents from DOJ production.	8.3	300	\$2,490.00	L140	ARK
10/3/2014	Search documents and master evidence spreadsheet, collect and summarize info regarding potential SDI custodians.	1.7	450	\$765.00	L140	JAL
10/3/2014	Review document productions regarding witness preparation; compile documents.	2.4	250	\$600.00	L140	BRM
10/3/2014	Draft letter to all defendants regarding discovery and the joint case management statement.	3.3	600	\$1,980.00	L300	SES
10/3/2014	Prepare for and attend ESI conference with Toshiba defendants.	0.8	600	\$480.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/3/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	7.9	550	\$4,345.00	L140	RSS
10/4/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	2.2	550	\$1,210.00	L140	RSS
10/5/2014	Review and code Sony documents from DOJ production.	6.5	300	\$1,950.00	L140	ARK
10/6/2014	Proofed letter to defense counsel, reviewed service list, and served the same.	1.5	250	\$375.00	L210	JSD
10/6/2014	Proofed and served letter to defense counsel re joint status report.	1	250	\$250.00	L300	JSD
10/6/2014	Review and code Sony documents from DOJ production.	5	300	\$1,500.00	L140	ARK
10/6/2014	Review document productions regarding witness preparation; compile documents; assist attorneys with document requests.	4.5	250	\$1,125.00	L140	BRM
10/6/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9.2	550	\$5,060.00	L140	RSS
10/7/2014	Review and code Sony documents from DOJ production.	10	300	\$3,000.00	L140	ARK
10/7/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	6.1	450	\$2,745.00	L140	JAL
10/7/2014	Review document productions regarding witness preparation; compile documents.	4.2	250	\$1,050.00	L140	BRM
10/7/2014	Edit letter to Toshiba summarizing discovery conference.	0.3	600	\$180.00	L300	SES
10/7/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management	9	550	\$4,950.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	of files and coding.					
10/7/2014	Prepare for, conduct, and summarize call regarding ESI.	2.2	425	\$935.00	L300	AYS
10/8/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	6	450	\$2,700.00	L140	JAL
10/8/2014	Update case file; review document productions regarding witness preparation; compile documents.	2.5	250	\$625.00	L140	BRM
10/8/2014	Discovery conference with NEC regarding ESI.	0.8	600	\$480.00	L300	SES
10/8/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8.5	550	\$4,675.00	L140	RSS
10/8/2014	Attend, take notes, and summarize ESI calls.	2.2	425	\$935.00	L300	AYS
10/9/2014	Edit requests and analyze discovery issues.	1.2	700	\$840.00	L300	JDF
10/9/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	6	450	\$2,700.00	L140	JAL
10/9/2014	Batteries meeting; Searching defendants for Batteries.	3	150	\$450.00	L140	CL
10/9/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9.2	550	\$5,060.00	L140	RSS
10/10/2014	Prepared letter and pre-paid boxes to class reps.	1.2	250	\$300.00	L300	JSD
10/10/2014	Edit requests and analyze discovery issues.	2	700	\$1,400.00	L300	JDF
10/10/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3	450	\$1,350.00	L140	JAL
10/10/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	8	150	\$1,200.00	L140	CL
10/10/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search	2.5	550	\$1,375.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	strategies. Work with Catalyst on training new reviewers and management of files and coding.					
10/10/2014	Prepare communications with Plaintiffs regarding documentation and summary of motion to dismiss denial order.	1.5	425	\$637.50	L300	AYS
10/13/2014	Edit requests and analyze discovery issues.	1.5	700	\$1,050.00	L300	JDF
10/13/2014	Review and code Sony documents from DOJ production.	8	300	\$2,400.00	L140	ARK
10/13/2014	Filled in fields in the Batteries Master Evidence List; Filled in new SONY- LIB documents to the Batteries Master Evidence List; Pulled out SONY-LIB documents for the E-file.	7.6	150	\$1,140.00	L140	CL
10/13/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	10.4	550	\$5,720.00	L140	RSS
10/14/2014	Formatted and proofed initial disclosures and researched third party company addresses.	4.5	250	\$1,125.00	L300	JSD
10/14/2014	Edit requests and analyze discovery issues.	1.8	700	\$1,260.00	L300	JDF
10/14/2014	Review and code Sony documents from DOJ production.	7	300	\$2,100.00	L140	ARK
10/14/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5.2	450	\$2,340.00	L140	JAL
10/14/2014	Filled in fields in the Batteries Master Evidence List; Batteries meeting; Filled in code to the Batteries SONY-LIB documents on the Catalyst.	8	150	\$1,200.00	L140	CL
10/14/2014	Preparation of initial disclosures; update case file; assist attorneys with issue/document requests.	3.4	250	\$850.00	L140	BRM
10/14/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9	550	\$4,950.00	L140	RSS
10/14/2014	Attend call regarding discovery, draft follow up letter.	2.2	425	\$935.00	L300	AYS
10/14/2014	Attend, take notes, and summarize ESI calls.	0.7	425	\$297.50	L300	AYS
10/15/2014	Formatted and proofed joint report.	1.5	250	\$375.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/15/2014	Proofed initial disclosures and researched third party company addresses.	2.5	250	\$625.00	L300	JSD
10/15/2014	Served plaintiffs' letters to defense counsel.	0.3	250	\$75.00	L300	JSD
10/15/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5.7	450	\$2,565.00	L140	JAL
10/15/2014	Assist with preparation of initial disclosures; update witness preparation binders.	3	250	\$750.00	L140	BRM
10/15/2014	Prepare for and attend discovery conference with Sony regarding ESI and transactional data.	0.5	600	\$300.00	L300	SES
10/15/2014	Prepare for and attend discovery conference with LG Chem regarding ESI.	1.5	600	\$900.00	L300	SES
10/15/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9.1	550	\$5,005.00	L140	RSS
10/15/2014	Review follow up letters from Hitachi.	1.3	425	\$552.50	L300	AYS
10/16/2014	Read document review manual, and read and submit signed stipulated protective order.	4	350	\$1,400.00	L140	JC
10/16/2014	Research and edit joint case management statement.	0.2	250	\$50.00	L100	JSD
10/16/2014	Reviewing materials for Batteries case.	1.4	125	\$175.00	L140	AE
10/16/2014	Review second amended complaint.	4	125	\$500.00	L140	JWJ
10/16/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9.3	450	\$4,185.00	L140	JAL
10/16/2014	Review Complaint and Stipulated Protective Order [signed Exhibit A to Stipulated Protective Order].	4	325	\$1,300.00	L140	PAR
10/16/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8.4	550	\$4,620.00	L140	RSS
10/17/2014	Read LIB complaint and document review manual.	8	350	\$2,800.00	L140	JC
10/17/2014	Reviewing materials for Batteries case and related preparation; Conference with Ms. Spiegel re review; Read Document Review Manual; Setting up	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Catalyst search; Coding unassigned Sony documents.					
10/17/2014	Reviewing the batteries notes/ Memo from Lin Chan re: SDI custodians; meetings with Ronnie; Reviewed "Sony English Second".	6.4	350	\$2,240.00	L140	НН
10/17/2014	Review second amended complaint.	4.5	125	\$562.50	L140	JWJ
10/17/2014	Review Complaint and Document Review Manual.	5.5	325	\$1,787.50	L140	PAR
10/17/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	7.2	550	\$3,960.00	L140	RSS
10/18/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	2.2	550	\$1,210.00	L140	RSS
10/19/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	1.1	550	\$605.00	L140	RSS
10/20/2014	Review LIB complaint to understand allegations and focus document review.	8	350	\$2,800.00	L140	JC
10/20/2014	Coding unassigned Sony documents.	8	125	\$1,000.00	L140	AE
10/20/2014	Reviewed "Sony English Second".	8	350	\$2,800.00	L140	HH
10/20/2014	LIB Case info review/2nd amended complaint-reading.	4	125	\$500.00	L140	JWJ
10/20/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	0.5	450	\$225.00	L140	JAL
10/20/2014	Create LGC and Sony charts and sent to Ronnie; Sorted LGC and Sony charts by LGC Working Custodian List in alphabetical order.	1.2	150	\$180.00	L140	CL
10/20/2014	Review Complaint, Document Review Manual, potential custodians information.	7.5	325	\$2,437.50	L140	PAR

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/20/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9.5	550	\$5,225.00	L140	RSS
10/20/2014	Revise follow up letter to LG Chem.	1	425	\$425.00	L300	AYS
10/21/2014	LIB team meeting; Catalyst training; Review documents to create list of proposed custodians for LGC defendants; Read LIB complaint.	8	350	\$2,800.00	L140	JC
10/21/2014	Formatted, fact-checked and proofed meet and confer letter.	1.5	250	\$375.00	L210	JSD
10/21/2014	Coding unassigned Sony documents; Weekly batteries meeting; Catalyst seminar; Researching gaps in LG Chem and Hitachi Maxell org charts.	8	125	\$1,000.00	L140	AE
10/21/2014	Reviewed "Sony English Second"; meeting with Shana and Ronnie re: batteries case; Catalyst training re: batteries case.	8	350	\$2,800.00	L140	НН
10/21/2014	Meeting with Shana and Ronnie; Catalyst Training; LIB Case LGC potential custodian list.	8	125	\$1,000.00	L140	JWJ
10/21/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9	450	\$4,050.00	L140	JAL
10/21/2014	Meeting; Catalyst training session.	3	150	\$450.00	L140	CL
10/21/2014	Document review regarding witness preparation; assist attorneys with issue/document requests.	4.2	250	\$1,050.00	L140	BRM
10/21/2014	Review Complaint, Document Review Manual, potential custodians information; Team meeting; Catalyst review software training; Search within Catalyst database for possible LG Chem custodians; Review Complaint.	5.8	325	\$1,885.00	L140	PAR
10/21/2014	Edit case management statement.	0.3	600	\$180.00	L210	SES
10/21/2014	Meeting with reviewers on case assignments.	0.7	600	\$420.00	L100	SES
10/21/2014	Telephone call with AMS regarding joint case management statement and coordinating DPP and IPP positions.	0.3	600	\$180.00	L300	SES
10/21/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8	550	\$4,400.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/21/2014	Revise follow up letter to LG Chem and send to defense counsel.	1	425	\$425.00	L300	AYS
10/22/2014	LIB team meeting; Review documents to create list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC
10/22/2014	Coding unassigned Sony documents; Batteries meeting; Coding and summarizing Panasonic doc forwarded by coworker.	8	125	\$1,000.00	L140	AE
10/22/2014	Reviewed "Sony English Second"; meeting with Ronnie.	8	350	\$2,800.00	L140	HH
10/22/2014	Meeting with Ronnie; LIB Case LGC potential custodian list.	8	125	\$1,000.00	L140	JWJ
10/22/2014	Review and code Sony documents from DOJ production.	4	300	\$1,200.00	L140	ARK
10/22/2014	Document Review-Review for liability documents-4.3. Meeting regarding document review5.	4.8	450	\$2,160.00	L140	JAL
10/22/2014	Filled in coding in SONY-LIB documents in the Catalyst; Meeting.	8.2	150	\$1,230.00	L140	CL
10/22/2014	Review document productions regarding witness preparation; compile documents; assist attorneys with issue/document requests; update witness preparation spreadsheet.	4.5	250	\$1,125.00	L140	BRM
10/22/2014	Research re possible LG Chem custodians; Team meeting.	3.3	325	\$1,072.50	L140	PAR
10/22/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8.4	550	\$4,620.00	L140	RSS
10/23/2014	Email re CMC.	0.5	900	\$450.00	L120	SWB
10/23/2014	Review documents to create list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC
10/23/2014	Proofed and served initial disclosures.	1	250	\$250.00	L300	JSD
10/23/2014	Coding unassigned Sony documents.	8	125	\$1,000.00	L140	AE
10/23/2014	Attn. discovery, case management.	2.5	700	\$1,750.00	L300	JDF
10/23/2014	Reviewed "Sony English Second".	8	350	\$2,800.00	L140	HH
10/23/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
10/23/2014	Review and code Sony documents from DOJ production.	1	300	\$300.00	L140	ARK
10/23/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5.2	450	\$2,340.00	L140	JAL
10/23/2014	Filled in coding in SONY-LIB documents in the Catalyst; Sorted LGC working list by ranking for final list; Exported three Sony Organization	8.2	150	\$1,230.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	charts from Catalyst.					
10/23/2014	Review document productions regarding witness preparation; compile documents; assist attorneys with issue/document requests.	5	250	\$1,250.00	L140	BRM
10/23/2014	Research re possible LG Chem custodians.	6.7	325	\$2,177.50	L140	PAR
10/23/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9.1	550	\$5,005.00	L140	RSS
10/24/2014	Review documents to create list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC
10/24/2014	Coding unassigned Sony documents.	8	125	\$1,000.00	L140	AE
10/24/2014	Reviewed "Sony English Second".	8	350	\$2,800.00	L140	HH
10/24/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
10/24/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	0.7	450	\$315.00	L140	JAL
10/24/2014	Creating a list of documents that no coding in Sony Organization Charts and sent to Ronnie; Filled in date to the Sony Organization Chart documents in the Catalyst; Downloaded Sony Organization chart documents from Catalyst into PDFs.	6.4	150	\$960.00	L140	CL
10/24/2014	Review document productions regarding witness preparation; compile documents; assist attorneys with issue/document requests.	4.8	250	\$1,200.00	L140	BRM
10/24/2014	Research re possible LG Chem custodians.	6.5	325	\$2,112.50	L140	PAR
10/24/2014	Edit letter to NEC regarding document custodians.	1	600	\$600.00	L210	SES
10/24/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8.1	550	\$4,455.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/25/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	2	550	\$1,100.00	L140	RSS
10/27/2014	Team meeting; Review documents to create list of proposed custodians for LGC defendants.	7.8	350	\$2,730.00	L140	JC
10/27/2014	Proofed, fact-checked and reviewed initial disclosures.	2	250	\$500.00	L300	JSD
10/27/2014	Coding unassigned Sony documents; Weekly Batteries meeting; Coding Hitachi Maxell documents and tracking custodians.	8	125	\$1,000.00	L140	AE
10/27/2014	Edit requests and analyze discovery issues.	1.5	700	\$1,050.00	L300	JDF
10/27/2014	Review Sony English Second documents; Meet with Ms. Scarlett and Ms. Spiegel.	8	350	\$2,800.00	L140	НН
10/27/2014	Meeting with SES and RS regarding document review and assignments.	1	150	\$150.00	L140	CL
10/27/2014	Assist with initial disclosures preparation; update case file; document review.	3	250	\$750.00	L140	BRM
10/27/2014	Research re possible LG Chem custodians; Team meeting.	7.5	325	\$2,437.50	L140	PAR
10/27/2014	Review documents regarding Sony custodians.	1.5	600	\$900.00	L300	SES
10/27/2014	Meeting with reviewers on case assignments.	0.5	600	\$300.00	L100	SES
10/27/2014	Draft initial disclosures on behalf of IPPs.	1	600	\$600.00	L300	SES
10/27/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. ork with Catalyst on training new reviewers and management of files and coding.	8.4	550	\$4,620.00	L140	RSS
10/28/2014	Review documents to create list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC
10/28/2014	Proofed initial disclosures.	0.5	250	\$125.00	L300	JSD
10/28/2014	Coding Hitachi Maxell documents and tracking custodians; Meeting of all Batteries reviewers; Reviewing best Japanese hot doc examples.	8	125	\$1,000.00	L140	AE
10/28/2014	Review Sony English Second documents; Review team meeting; Meeting with Ms. Spiegel.	8	350	\$2,800.00	L140	НН
10/28/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/28/2014	Lithium Ion Batteries Team Conference Call.	0.6	300	\$180.00	L140	ARK
10/28/2014	Conference Call regarding document review8. Document Review-Review and code for liability documents-5.9.	6.7	450	\$3,015.00	L140	JAL
10/28/2014	Assist with hearing preparation; document review; assist with case schedule organization.	3.5	250	\$875.00	L140	BRM
10/28/2014	Research re possible LG Chem custodians.	8.5	325	\$2,762.50	L140	PAR
10/28/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8.1	550	\$4,455.00	L140	RSS
10/29/2014	Prepare for case management conference.	1	900	\$900.00	L230	SWB
10/29/2014	Review documents to create list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC
10/29/2014	Coding Hitachi Maxell documents and tracking custodians.	8	125	\$1,000.00	L140	AE
10/29/2014	Prepare for case management conference.	2.5	700	\$1,750.00	L100	JDF
10/29/2014	Review Sony English Second documents.	8	350	\$2,800.00	L140	HH
10/29/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
10/29/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.5	450	\$3,375.00	L140	JAL
10/29/2014	Document review; assist with hearing preparation.	4.2	250	\$1,050.00	L140	BRM
10/29/2014	Research re possible LG Chem custodians.	5.5	325	\$1,787.50	L140	PAR
10/29/2014	Prepare for case management conference before Judge Gonzalez Rogers.	8.3	600	\$4,980.00	L450	SES
10/29/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	8	550	\$4,400.00	L140	RSS
10/30/2014	Prepare for and attend case management conference; Office conference re to- do.	5	900	\$4,500.00	L230	SWB
10/30/2014	Work on translation of LGC organization chart to assist in list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/30/2014	Finalized initial disclosures.	1.2	250	\$300.00	L300	JSD
10/30/2014	Coding Hitachi Maxell documents and tracking custodians.	7.8	125	\$975.00	L140	AE
10/30/2014	Case management conference.	1.5	700	\$1,050.00	L100	JDF
10/30/2014	Review Sony English Second documents.	8	350	\$2,800.00	L140	HH
10/30/2014	LIB LGC org chart rough translation; Search for and translate documents to identify potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
10/30/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	5.6	450	\$2,520.00	L140	JAL
10/30/2014	Update case file; review discovery responses.	1.6	250	\$400.00	L140	BRM
10/30/2014	Research re possible Hitachi-Maxell custodians, review of Catalyst search guide.	5	325	\$1,625.00	L140	PAR
10/30/2014	Edit requests for production of documents and interrogatories to defendants.	1	600	\$600.00	L300	SES
10/30/2014	Attend case management conference before Judge Gonzalez Rogers.	3	600	\$1,800.00	L450	SES
10/30/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	9.1	550	\$5,005.00	L140	RSS
10/31/2014	Work on translation of LGC organization chart to assist in list of proposed custodians for LGC defendants.	8	350	\$2,800.00	L140	JC
10/31/2014	Filled up hearing transcript request form and efiled the same.	0.5	250	\$125.00	L300	JSD
10/31/2014	Coding Hitachi Maxell documents and tracking custodians.	8.2	125	\$1,025.00	L140	AE
10/31/2014	Review Sony English Second documents.	8	350	\$2,800.00	L140	HH
10/31/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	7	125	\$875.00	L140	JWJ
10/31/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1.8	450	\$810.00	L140	JAL
10/31/2014	Update case file; document review.	2.1	250	\$525.00	L140	BRM
10/31/2014	Research re possible Hitachi-Maxell custodians; Review Catalyst search guide.	2	325	\$650.00	L140	PAR
10/31/2014	Meet and confer with Toshiba on transactional data and ESI.	0.7	600	\$420.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/31/2014	Review management, including management of English and foreign language review teams, document productions, custodians, coding, translations. Collection, organization and analysis of key actors and evidence. Preparation and planning for next wave of production and search strategies. Work with Catalyst on training new reviewers and management of files and coding.	6.4	550	\$3,520.00	L140	RSS
11/2/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
11/2/2014	Answering and responding to emails from reviewers and management team. Reviewing work product of review team.	2	550	\$1,100.00	L120	RSS
11/3/2014	Review documents to create list of proposed custodians for Hitachi defendants.	5	350	\$1,750.00	L140	JC
11/3/2014	Re-formatted and proofed chart of proposed schedules.	0.5	250	\$125.00	L100	JSD
11/3/2014	Calendared due dates.	0.5	250	\$125.00	L100	JSD
11/3/2014	Coding Hitachi Maxell documents; Weekly meeting; Coding Panasonic documents; Dealing with and reporting Catalyst technical errors.	8	125	\$1,000.00	L140	AE
11/3/2014	Edit requests and analyze discovery issues.	2.3	700	\$1,610.00	L300	JDF
11/3/2014	Review Sony English Second documents; Meet with Ms. Scarlett and Ms. Spiegel; Work on Panasonic custodian chart (rows 21-35); Review Chinese documents from Hisun Rim.	8	350	\$2,800.00	L140	НН
11/3/2014	Group Meeting led by Shana and Ronnie; LIB Case LGC potential custodian list.	8	125	\$1,000.00	L140	JWJ
11/3/2014	Meeting; Created Excel sheet for Hitachi and sent to Ronnie; Moved rough and full translation documents for a Battery to reviewers shared folder; Created Excel sheet for Panasonic and sent to Ronnie; Added "current or former" on the Batteries Master Cast of Characters.	4	150	\$600.00	L140	CL
11/3/2014	Assist attorneys with issue/document requests; update case file; review discovery.	1.3	250	\$325.00	L140	BRM
11/3/2014	Research re possible Hitachi Maxell custodians; Team meeting.	8	325	\$2,600.00	L140	PAR
11/3/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	9.1	550	\$5,005.00	L120	RSS
11/4/2014	Review documents to create list of proposed custodians for Hitachi defendants.	9	350	\$3,150.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/4/2014	Researching Panasonic custodians; Weekly all reviewers meeting; Researching Panasonic custodians' positions/titles.	8	125	\$1,000.00	L140	AE
11/4/2014	Call re case organization.	1	700	\$700.00	L100	JDF
11/4/2014	Review Chinese documents from Hisun Rim; Review team meeting; Meeting with Ms. Spiegel.	8	350	\$2,800.00	L140	HH
11/4/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/4/2014	Conference Call regarding document review4. Document Review-Review and code for liability documents-8.4.	8.8	450	\$3,960.00	L140	JAL
11/4/2014	Research re possible Hitachi Maxell custodians.	7	325	\$2,275.00	L140	PAR
11/4/2014	Prepare for hearing before Magistrate Ryu regarding motion for deposition protocol and discovery disputes.	2	600	\$1,200.00	L200	SES
11/4/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations. Answering questions from review team, edit and review of team work product.	8.7	550	\$4,785.00	L120	RSS
11/5/2014	Review documents to create list of proposed custodians for Hitachi defendants; Review documents to create list of custodians for Panasonic defendants.	9	350	\$3,150.00	L140	JC
11/5/2014	Researching Panasonic custodians' positions/titles; Researching Panasonic custodians.	8	125	\$1,000.00	L140	AE
11/5/2014	Review Chinese documents from Hisun Rim; Work on Panasonic custodian chart.	8	350	\$2,800.00	L140	HH
11/5/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/5/2014	Review and code Sony documents from DOJ production.	2	300	\$600.00	L140	ARK
11/5/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	7.1	450	\$3,195.00	L140	JAL
11/5/2014	Added Amy's additions into the Panasonic Working Custodian chart and the Batteries Master Cast of Characters; Added Jongguk and Patrick's additions into the Hitachi Chart and the Batteries Master Cast of Characters.	4	150	\$600.00	L140	CL
11/5/2014	Research re possible Hitachi Maxell custodians.	8	325	\$2,600.00	L140	PAR

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/5/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	9.6	550	\$5,280.00	L120	RSS
11/6/2014	Review documents to create list of custodians for Panasonic defendants.	9	350	\$3,150.00	L140	JC
11/6/2014	Formatted, fact-checked and proofed letter to counsel.	1.5	250	\$375.00	L300	JSD
11/6/2014	Researching Panasonic custodians; Researching Japanese Hitachi Maxell employees for coworker.	8	125	\$1,000.00	L140	AE
11/6/2014	Attn. review Rule 1292.	1	700	\$700.00	L210	JDF
11/6/2014	Work on Panasonic custodian chart.	8	350	\$2,800.00	L140	HH
11/6/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/6/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	4	450	\$1,800.00	L140	JAL
11/6/2014	Added Jongguk and Patrick's additions into the Hitachi Chart and the Batteries Master Cast of Characters; Added Sanyo and Sony additions From Hisun Rim into the Batteries Master Cast of Characters; Added Amy's additions into the Panasonic Working Custodian chart and the Batteries Master Cast of Characters.	8	150	\$1,200.00	L140	CL
11/6/2014	Audit of defendant document productions for loading into database; assist attorneys with issue/document requests.	2.5	250	\$625.00	L140	BRM
11/6/2014	Research re possible Hitachi Maxell custodians.	7	325	\$2,275.00	L140	PAR
11/6/2014	Telephone call with DPP counsel re strategy, schedule and joint case management statement due on November 10, 2014.	0.2	600	\$120.00	L100	SES
11/6/2014	Respond to Lin Chan (LCHB) request for advice on case management, discovery, translations, and past experience in drafting discovery protocols in DRAM, SRAM, LCD, and CRT.	1	550	\$550.00	L120	RSS
11/6/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	8.9	550	\$4,895.00	L120	RSS
11/7/2014	Review documents to create list of custodians for Panasonic defendants.	8	350	\$2,800.00	L140	JC
11/7/2014	Assisted in the preparation for counsel's meeting; attended to attorneys' inquiries and requests.	0.7	250	\$175.00	L100	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/7/2014	Work on Panasonic custodian chart.	8	350	\$2,800.00	L140	HH
11/7/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/7/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1.5	450	\$675.00	L140	JAL
11/7/2014	Added Helen's additions into the Panasonic working Custodian chart and the batteries Mater Cast of Characters.	2	150	\$300.00	L140	CL
11/7/2014	Added Sanyo additions From Hisun Rim into the Batteries Master Cast of Characters; Added Patrick's additions into the Hitachi Chart and the Batteries Master Cast of Characters.	1	150	\$150.00	L140	CL
11/7/2014	Meeting with L. Chan and counsel for DPPs re strategy for hearing before Magistrate Judge Ryu.	4	600	\$2,400.00	L121	SES
11/7/2014	Meeting with Sony regarding corporate structure.	2	600	\$1,200.00	L230	SES
11/7/2014	Communication with Lin Chan re her request for information on running discovery in SRAM and CRT.	1.5	550	\$825.00	L120	RSS
11/7/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	7.9	550	\$4,345.00	L120	RSS
11/7/2014	Meet with Sony defendants regarding organizational chart and co lead counsel.	4	425	\$1,700.00	L300	AYS
11/7/2014	Correspond with named plaintiffs regarding records retention.	1	425	\$425.00	L300	AYS
11/8/2014	Review and code Sony documents from DOJ production.	7	300	\$2,100.00	L140	ARK
11/8/2014	Responding to reviewer emails and questions re document review. Review of work product.	1.2	550	\$660.00	L120	RSS
11/9/2014	Review and code Sony documents from DOJ production.	5	300	\$1,500.00	L140	ARK
11/10/2014	LIB team meeting; Review documents to create list of custodians for Panasonic defendants.	7.6	350	\$2,660.00	L140	JC
11/10/2014	Researching Panasonic custodians; Weekly meeting.	8	125	\$1,000.00	L140	AE
11/10/2014	Group Meeting lead by Ronnie; LIB Case Panasonic potential custodian list.	8	125	\$1,000.00	L140	JWJ
11/10/2014	Worked on Panasonic custodian chart, and searched and reviewed related documents in Catalyst; group meeting with Ronnie.	8	150	\$1,200.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/10/2014	Added Jessica's additions into the Hitachi chart and the Batteries Master Cast of Characters; Meeting; Updated Hitachi chart; Sent Hitachi with all additions to Ronnie; Added corrections and additions from Hisun into the Batteries Master Cast of Characters.	4.5	150	\$675.00	L140	CL
11/10/2014	Research re possible Hitachi Maxell custodians; Team meeting.	8	325	\$2,600.00	L140	PAR
11/10/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	9.6	550	\$5,280.00	L120	RSS
11/10/2014	Read and review interrogatory responses for named plaintiffs in ODD.	1	425	\$425.00	L300	AYS
11/11/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	9.6	550	\$5,280.00	L120	RSS
11/12/2014	Review documents to create list of custodians for Panasonic defendants.	8	350	\$2,800.00	L140	JC
11/12/2014	Formatted and proofed meet and confer letter.	0.5	250	\$125.00	L300	JSD
11/12/2014	Formatted and proofed requests for production of documents.	0.5	250	\$125.00	L300	JSD
11/12/2014	Researching Panasonic custodians; Researching Japanese Panasonic custodian for coworker.	8	125	\$1,000.00	L140	AE
11/12/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/12/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	9.1	450	\$4,095.00	L140	JAL
11/12/2014	Worked on Panasonic custodian chart, and searched and reviewed related documents in Catalyst.	8	150	\$1,200.00	L140	CL
11/12/2014	Added Amy and Jongguk's additions into the Panasonic Working Custodian chart and the Batteries Master Cast of Characters; Fixed green color rows in the Batteries Cast of Characters.	6.5	150	\$975.00	L140	CL
11/12/2014	Assist attorneys with document/issue requests; update case file.	1.5	250	\$375.00	L140	BRM
11/12/2014	Research re possible Hitachi Maxell custodians.	1.5	325	\$487.50	L140	PAR
11/12/2014	Prepare for and attend call with Panasonic and Sanyo regarding transactional data. Conference call with DPP counsel re same.	2	600	\$1,200.00	L230	SES
11/12/2014	Management of review team and Catalyst database.	2.2	550	\$1,210.00	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/12/2014	Review previous requests for production and prepare to draft RFP for California choice of law.	3	425	\$1,275.00	L300	AYS
11/12/2014	Attend call with defendants regarding transactional data, draft follow up letter summarizing call.	4.2	425	\$1,785.00	L300	AYS
11/13/2014	Review documents to create list of custodians for Panasonic defendants.	8	350	\$2,800.00	L140	JC
11/13/2014	Formatted and proofed interrogatory requests.	1.5	250	\$375.00	L300	JSD
11/13/2014	Proofed letter to defense counsel re transactional data.	1.3	250	\$325.00	L300	JSD
11/13/2014	Reporting Catalyst errors; Researching Panasonic custodians.	8	125	\$1,000.00	L140	AE
11/13/2014	Edit requests and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
11/13/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/13/2014	Review and code Sony documents from DOJ production.	5.7	300	\$1,710.00	L140	ARK
11/13/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.2	450	\$1,440.00	L140	JAL
11/13/2014	Worked on Panasonic custodian chart, and searched and reviewed related documents in Catalyst.	8	150	\$1,200.00	L140	CL
11/13/2014	Added Patrick's additions into the Hitachi chart.	0.5	150	\$75.00	L140	CL
11/13/2014	Research re possible Hitachi Maxell custodians.	8	325	\$2,600.00	L140	PAR
11/13/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	2.5	550	\$1,375.00	L120	RSS
11/13/2014	Review previous requests for production and prepare to draft RFP for California choice of law.	3.2	425	\$1,360.00	L300	AYS
11/13/2014	Revise follow up letter.	1	425	\$425.00	L300	AYS
11/14/2014	Review documents to create list of custodians for Panasonic defendants.	8	350	\$2,800.00	L140	JC
11/14/2014	Researching Panasonic custodians.	8	125	\$1,000.00	L140	AE
11/14/2014	Search for and translate documents to create list of potential custodians for LGC defendants.	8	125	\$1,000.00	L140	JWJ
11/14/2014	Review and code Sony documents from DOJ production.	7.3	300	\$2,190.00	L140	ARK
11/14/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	3.6	450	\$1,620.00	L140	JAL
11/14/2014	Worked on Panasonic custodian chart, and searched and reviewed related documents in Catalyst.	8	150	\$1,200.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/14/2014	Added Patrick's additions into the Hitachi chart and the Master Cast of Characters; Updated Sony Cast of Characters from Hisun into the Batteries Master Cast of Characters.	3.5	150	\$525.00	L140	CL
11/14/2014	Research re possible Hitachi Maxell custodians.	6.5	325	\$2,112.50	L140	PAR
11/14/2014	Revise draft RFP for California choice of law, write memo summarizing overlap between RFP and previous RFP, correspond with co counsel.	4.7	425	\$1,997.50	L300	AYS
11/15/2014	Worked on Panasonic custodian chart, and searched and reviewed related documents in Catalyst; Reviewed and coded S-DOJ0168541.	8	150	\$1,200.00	L140	CL
11/16/2014	Review and code Sony documents from DOJ production.	5	300	\$1,500.00	L140	ARK
11/17/2014	LIB team meeting; Review documents to create list of custodians for Panasonic defendants. Translation of LGC org chart.	8	350	\$2,800.00	L140	JC
11/17/2014	Researching Panasonic custodians; Weekly meeting; Coding Panasonic documents.	8	125	\$1,000.00	L140	AE
11/17/2014	Edit requests and analyze discovery issues.	2.7	700	\$1,890.00	L300	JDF
11/17/2014	Worked on Panasonic custodian chart, and searched and reviewed related documents in Catalyst; group meeting with Ronnie; Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	НН
11/17/2014	LIB Case LGC org chart translation.	8	125	\$1,000.00	L140	JWJ
11/17/2014	Added Patrick's additions into the Hitachi chart and the Master Cast of Characters; Meeting; Added Helen and Jessica additions into the Panasonic Working Custodian chart and the Batteries Master Cast of Characters.	8.5	150	\$1,275.00	L140	CL
11/17/2014	Research re possible Hitachi Maxell custodians; Team meeting.	8	325	\$2,600.00	L140	PAR
11/17/2014	Call with possible expert.	0.8	600	\$480.00	L130	SES
11/17/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	6.1	550	\$3,355.00	L120	RSS
11/17/2014	Revise letter to defendants per co counsel comments.	1	425	\$425.00	L300	AYS
11/17/2014	Revise draft RFP for California choice of law, write memo summarizing overlap between RFP and previous RFP, correspond with co counsel.	4.5	425	\$1,912.50	L300	AYS
11/18/2014	Translation of LGC org chart.	8	350	\$2,800.00	L140	JC
11/18/2014	Formatted and proofed meet and confer letter.	1	250	\$250.00	L300	JSD
11/18/2014	Coding Panasonic documents; Battery reviewers meeting.	8	125	\$1,000.00	L140	AE
11/18/2014	LIB Case LGC org chart translation.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/18/2014	Lithium Ion Batteries Team Conference Call.	0.3	300	\$90.00	L140	ARK
11/18/2014	Conference Call regarding document review3. Document Review-Review and code for liability documents-7.4.	7.7	450	\$3,465.00	L140	JAL
11/18/2014	Added Amy and Jongguk additions into the Panasonic Working Custodian chart; Added Jongguk into the Batteries Master Cast of Characters.	8	150	\$1,200.00	L140	CL
11/18/2014	Research re possible Hitachi Maxell custodians.	8	325	\$2,600.00	L140	PAR
11/18/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	7.5	550	\$4,125.00	L120	RSS
11/18/2014	Revise letter to defendants per co counsel comments.	1	425	\$425.00	L300	AYS
11/19/2014	Translation of LGC org chart; LIB team meeting; Write-up of global conspiracy for the purposes of a discovery motion to compel production of worldwide data.	8	350	\$2,800.00	L140	JC
11/19/2014	Formatted letter to defense counsel.	0.2	250	\$50.00	L300	JSD
11/19/2014	Proofed meet and confer letter.	1.2	250	\$300.00	L300	JSD
11/19/2014	Coding Panasonic documents; HB Batteries meeting.	8	125	\$1,000.00	L140	AE
11/19/2014	Edit requests and analyze discovery issues.	2.3	700	\$1,610.00	L300	JDF
11/19/2014	Reviewed and coded "Sony English Second" documents; group meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	HH
11/19/2014	LIB Case LGC org chart translation; Group Meeting lead by Shana and Ronnie.	8	125	\$1,000.00	L140	JWJ
11/19/2014	Document Review-Review and code for liability documents6. Draft email describing hot document3. Search for information regarding Sony employee to be added to cast of characters4.	1.3	450	\$585.00	L140	JAL
11/19/2014	Added Patrick's additions into the Hitachi chart and the Master Cast of Characters; Added Amy's additions into the Batteries Master Cast of Characters; Meeting; Downloaded Samsung SDI Production and saved in the Batteries shared folder; Corrected custodian names and duplicate entries from Amy's notes on the Batteries Master Cast of Characters.	8.5	150	\$1,275.00	L140	CL
11/19/2014	Research re possible Hitachi Maxell custodians; Team meeting.	8	325	\$2,600.00	L140	PAR
11/19/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and	8	550	\$4,400.00	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	management of translations.					
11/19/2014	Correspond with named plaintiffs.	1	425	\$425.00	L300	AYS
11/19/2014	Revise letter to defendants per co-counsel comments.	1.2	425	\$510.00	L300	AYS
11/20/2014	Catalyst training; Translation of LGC org chart.	8	350	\$2,800.00	L140	JC
11/20/2014	Proofed third set of interrogatories.	2	250	\$500.00	L300	JSD
11/20/2014	Coding Panasonic documents; Creating Panasonic custodian ranking summary chart.	8	125	\$1,000.00	L140	AE
11/20/2014	Edit requests and analyze discovery issues.	1	700	\$700.00	L300	JDF
11/20/2014	Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	HH
11/20/2014	LIB Case Samsung SDI coding; catalyst coding Meeting led by Ronnie.	8	125	\$1,000.00	L140	JWJ
11/20/2014	Review and code Sony documents from DOJ production.	2.8	300	\$840.00	L140	ARK
11/20/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	8.6	450	\$3,870.00	L140	JAL
11/20/2014	Corrected custodian names and duplicate entries from Amy's notes on the Panasonic Working Custodian Chart; Putting dates in the Samsung SDI Production documents on the Catalyst.	6	150	\$900.00	L140	CL
11/20/2014	Assist attorneys with issue/document requests; update case file.	1	250	\$250.00	L140	BRM
11/20/2014	Review hot doc memoranda and case background materials.	2	325	\$650.00	L140	PAR
11/20/2014	Research re possible Hitachi Maxell custodians; Catalyst training meeting re doc coding and generating reports on specific issues such as California contacts.	6	325	\$1,950.00	L140	PAR
11/20/2014	Draft and edit letter and interrogatories regarding California contacts.	2	600	\$1,200.00	L310	SES
11/20/2014	Call with Ronnie Spiegel re case assignments; meeting with review team regarding case assignments and case status.	0.5	600	\$300.00	L121	SES
11/20/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	8.1	550	\$4,455.00	L120	RSS
11/20/2014	Draft letter memo summarizing overlap between current discovery and previous discovery, correspond with co counsel.	1.7	425	\$722.50	L300	AYS
11/20/2014	Revise letter to defendants per co counsel comments.	2	425	\$850.00	L300	AYS
11/21/2014	Review LIB antitrust complaint.	8	350	\$2,800.00	L140	JC
11/21/2014	Proofed letter to all defense counsel re document requests.	1.5	250	\$375.00	L300	JSD
11/21/2014	Prepared third party subpoena chart.	2.5	250	\$625.00	L300	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/21/2014	Creating Panasonic custodian ranking summary chart; Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
11/21/2014	Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	HH
11/21/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	8	125	\$1,000.00	L140	JWJ
11/21/2014	Review and code Sony documents from DOJ production.	11.5	300	\$3,450.00	L140	ARK
11/21/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	2.5	450	\$1,125.00	L140	JAL
11/21/2014	Merged all Word translation documents into one Word document, Excel translation documents into one Excel document, also printed into PDFs, and saved in Batteries shared folder; Added Amy's additions into the Panasonic Working Custodian chart; Added Jongguk into the Batteries Master Cast of Characters.	2	150	\$300.00	L140	CL
11/21/2014	Call with Lin Chan and DL re task list. Follow up and circulate task list to co-lead counsel.	1	600	\$600.00	L121	SES
11/21/2014	Review documents regarding Sony custodians.	2.3	600	\$1,380.00	L140	SES
11/21/2014	Draft translation protocol. Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	8.1	550	\$4,455.00	L120	RSS
11/21/2014	Draft letter memo summarizing overlap between current discovery and previous discovery, correspond with co counsel.	3	425	\$1,275.00	L300	AYS
11/21/2014	Draft letter memo summarizing overlap between current discovery and previous discovery, correspond with co counsel.	4.3	425	\$1,827.50	L300	AYS
11/22/2014	Review and code Sony documents from DOJ production.	9.5	300	\$2,850.00	L140	ARK
11/23/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
11/24/2014	LIB team meeting; Review SDI production to select documents for translation and identify deponents.	8	350	\$2,800.00	L140	JC
11/24/2014	Proofed interrogatories and accompanying letter to all defense counsel.	1.5	250	\$375.00	L300	JSD
11/24/2014	Coding Japanese Sanyo documents; Researching Panasonic custodians; Weekly meeting.	8	125	\$1,000.00	L140	AE
11/24/2014	Edit requests and analyze discovery issues.	2.3	700	\$1,610.00	L300	JDF
11/24/2014	LIB Case SDI document coding; Group Meeting lead by Shana and Ronnie.	8	125	\$1,000.00	L140	JWJ
11/24/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/24/2014	Merged all Word translation documents from Jessica into one Word document, also printed into PDFs, and saved in Batteries shared folder; Batteries meeting; Added Patrick's additions into the Hitachi chart and the Master Cast of Characters.	2.5	150	\$375.00	L140	CL
11/24/2014	Research re possible <u>Hitachi Maxell custodians</u> ; Team meeting; Research in document database create a list of most relevant documents produced thus far.	8	325	\$2,600.00	L140	PAR
11/24/2014	Meet and confer with Sony regarding transactional data. Draft declaration in support of motion to compel worldwide data.	1	600	\$600.00	L230	SES
11/24/2014	Draft form subpoena to manufacturers and retailers regarding pass-through.	1	600	\$600.00	L300	SES
11/24/2014	Review Toshiba's answer to complaint. Review Toshiba's letter regarding motion for summary judgment. Email counsel for Toshiba regarding same. Research	3	600	\$1,800.00	L210	SES
11/24/2014	Telephone call with G. Albertson re case status.	0.2	600	\$120.00	L100	SES
11/24/2014	Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	2.2	550	\$1,210.00	L120	RSS
11/25/2014	Review SDI production to select documents for translation and identify deponents.	8	350	\$2,800.00	L140	JC
11/25/2014	Proofed Attachment A to subpoenas to retailers and manufacturers.	1.5	250	\$375.00	L300	JSD
11/25/2014	Completing Panasonic custodian charts; Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
11/25/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	8	125	\$1,000.00	L140	JWJ
11/25/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
11/25/2014	Organization of custodian documents for review.	1.8	250	\$450.00	L140	BRM
11/25/2014	Research in document database regarding create a list of most relevant documents produced thus far; QC) review and analysis write-up of documents in database as needed.	8	325	\$2,600.00	L140	PAR
11/25/2014	Draft letter to GS Yuasa regarding early summary judgment motion.	3.7	600	\$2,220.00	L210	SES
11/25/2014	Draft task list for co-lead counsel.	0.7	600	\$420.00	L121	SES
11/25/2014	Prepare for and attend call with Panasonic and Sanyo on finished product data.	1.3	600	\$780.00	L230	SES
11/25/2014	Draft declaration regarding burden associated with production of worldwide	0.5	600	\$300.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	data.					
11/25/2014	Draft form subpoena to manufacturers and retailers regarding pass-through.	1	600	\$600.00	L300	SES
11/25/2014	Discussion of translation protocol with Nate Cihlar. Management and organization of the review team and Catalyst database. Review of all work product, planning for next wave of discovery, overseeing team re custodian lists, review and update of collection charts, planning and management of translations.	2.6	550	\$1,430.00	L120	RSS
11/26/2014	Review SDI production to select documents for translation and identify deponents.	8	350	\$2,800.00	L140	JC
11/26/2014	Proofed rog requests and accompanying letter to all defense counsel and served the same.	1	250	\$250.00	L300	JSD
11/26/2014	Coding Japanese Sanyo documents.	5.8	125	\$725.00	L140	AE
11/26/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	4	125	\$500.00	L140	JWJ
11/26/2014	Added Patrick's additions into the Hitachi chart and the Master Cast of Characters; Formatting Jongguk and Jessica translation of LGC-MDL0001109PT ORG charts.	5	150	\$750.00	L140	CL
11/26/2014	Review documents in database for responsiveness and key issues; review case background materials.	5.8	325	\$1,885.00	L140	PAR
11/26/2014	Edit letter and interrogatory regarding California contacts; email to group re same. Service.	1.5	600	\$900.00	L300	SES
11/26/2014	Meet and confer with Toshiba regarding finished product data and procedure for summary judgment motion. Follow up call with LC and DPP counsel re same.	1.5	600	\$900.00	L230	SES
11/26/2014	Answering reviewer questions. Assessing progress of document review by the numbers completed.	1.1	550	\$605.00	L120	RSS
11/27/2014	Review SDI production to select documents for translation and identify deponents.	8	350	\$2,800.00	L140	JC
11/27/2014	Review and code Sony documents from DOJ production.	7	300	\$2,100.00	L140	ARK
11/28/2014	Review SDI production to select documents for translation and identify deponents.	5	350	\$1,750.00	L140	JC
11/29/2014	Review and code Sony documents from DOJ production.	3.5	300	\$1,050.00	L140	ARK
11/30/2014	Review and code Sony documents from DOJ production.	7.5	300	\$2,250.00	L140	ARK

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/1/2014	Review SDI production to select documents for translation and identify deponents; Coding documents in Catalyst of SDI new production.	8	350	\$2,800.00	L140	JC
12/1/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/1/2014	Attn. data discovery.	2.3	700	\$1,610.00	L300	JDF
12/1/2014	Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	HH
12/1/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	8	125	\$1,000.00	L140	JWJ
12/1/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
12/1/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	2.9	450	\$1,305.00	L140	JAL
12/1/2014	Created text box ORG chart and added translation contents into text box; Formatted Jongguk and Jessica translation of LGC-MDL0001109PT ORG charts 2003-2004.	2.8	150	\$420.00	L140	CL
12/1/2014	Review pleadings and correspondence; update case file; process and distribute document production; compile and organize production documents for attorney review.	3	250	\$750.00	L140	BRM
12/1/2014	Research in document database regarding create a list of most relevant documents produced thus far; QC review and analysis write-up of documents in database as needed.	8	325	\$2,600.00	L140	PAR
12/1/2014	Draft chart for describing finished products.	3.1	425	\$1,317.50	L300	AYS
12/2/2014	Coding documents in Catalyst of SDI new production.	8	350	\$2,800.00	L140	JC
12/2/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/2/2014	Edit and analyze motion re raw data.	1	700	\$700.00	L210	JDF
12/2/2014	Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	HH
12/2/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	8	125	\$1,000.00	L140	JWJ
12/2/2014	Review and code Sony documents from DOJ production.	10	300	\$3,000.00	L140	ARK
12/2/2014	Conference Call regarding document review3. Document Review-Review and code for liability documents-5.7.	6	450	\$2,700.00	L140	JAL
12/2/2014	Created text box ORG chart and added translation contents into text box; Formatted Jongguk and Jessica translation of LGC-MDL0001109PT ORG charts 2005-2007.	8	150	\$1,200.00	L140	CL
12/2/2014	Update case file; review discovery responses; create discovery response chart.	3.3	250	\$825.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/2/2014	Research in document database regarding create a list of most relevant documents produced thus far; QC review and analysis write-up of documents in database as needed.	3.5	325	\$1,137.50	L140	PAR
12/2/2014	Edit opposition to Defendants' motion requesting interlocutory appeal pursuant to section 1292(b).	5.9	600	\$3,540.00	L210	SES
12/2/2014	Edit letter to the court regarding dispute over worldwide transactional data.	2.5	600	\$1,500.00	L310	SES
12/3/2014	Coding documents in Catalyst of SDI new production.	8	350	\$2,800.00	L140	JC
12/3/2014	Calendared due dates and cleaned up calendar.	0.3	250	\$75.00	L100	JSD
12/3/2014	Formatted and proofed discovery plan.	0.8	250	\$200.00	L310	JSD
12/3/2014	Formatted, fact-checked and proofed letter to defense counsel re discovery; entered co-counsel edits and served the same.	1.4	250	\$350.00	L300	JSD
12/3/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/3/2014	Attn. 1292(b) briefing.	1.1	700	\$770.00	L210	JDF
12/3/2014	Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	HH
12/3/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	8	125	\$1,000.00	L140	JWJ
12/3/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
12/3/2014	Review notes from document review for items to add to key terms list-2. Document Review-Review and code for liability documents7.	2.7	450	\$1,215.00	L140	JAL
12/3/2014	Review and organize production documents for attorney review; review draft correspondence; update case file.	1.2	250	\$300.00	L140	BRM
12/3/2014	Research in document database regarding create a list of most relevant documents produced thus far; QC) review and analysis write-up of documents in database as needed.	2	325	\$650.00	L140	PAR
12/3/2014	Edit opposition to Defendants' motion requesting interlocutory appeal pursuant to section 1292(b).	2.5	600	\$1,500.00	L210	SES
12/3/2014	Conference call with direct purchasers regarding opposition to defendants' request for interlocutory appeal pursuant to 1292(b).	0.4	600	\$240.00	L210	SES
12/3/2014	Draft discovery plan on behalf of indirect purchaser plaintiffs.	0.8	600	\$480.00	L310	SES
12/3/2014	Edit opposition to Defendants' motion requesting interlocutory appeal pursuant to section 1292(b).	2	600	\$1,200.00	L210	SES
12/3/2014	Draft chart for describing finished products.	1.4	425	\$595.00	L300	AYS
12/4/2014	Coding documents in Catalyst of SDI new production.	7	350	\$2,450.00	L140	JC
12/4/2014	Proofed, fact-checked, quote-checked opposition to 1292(b) motion.	2	250	\$500.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/4/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/4/2014	Attn. case org; Attn. 1292(b) draft.	1.5	700	\$1,050.00	L210	JDF
12/4/2014	Search for and translate documents to create list of potential custodians for SDI defendants.	8	125	\$1,000.00	L140	JWJ
12/4/2014	Review and code Sony documents from DOJ production.	8	300	\$2,400.00	L140	ARK
12/4/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	4	450	\$1,800.00	L140	JAL
12/4/2014	Update case file and calendar; update discovery responses project; review draft 1292 opposition brief; process document production.	2.2	250	\$550.00	L140	BRM
12/4/2014	Draft and send emails to defendants regarding finished product data. Review record regarding finished product transactional data with defendants.	3.6	600	\$2,160.00	L300	SES
12/4/2014	Review finished products letter for completeness.	0.5	425	\$212.50	L300	AYS
12/5/2014	Proofed, finalized and served letter re discovery.	1.5	250	\$375.00	L300	JSD
12/5/2014	Proofed, fact-checked, quote-checked opposition to 1292(b) motion.	3	250	\$750.00	L210	JSD
12/5/2014	Coding Japanese Sanyo documents; Filling out Japanese names in search terms list.	8	125	\$1,000.00	L140	AE
12/5/2014	Reviewed and coded "Sony English Second" documents.	8	350	\$2,800.00	L140	HH
12/5/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	1	450	\$450.00	L140	JAL
12/5/2014	Process document production; update case file; assist with preparation of 1292 opposition brief.	3	250	\$750.00	L140	BRM
12/5/2014	Review documents and annual filings of GS Yuasa	2.5	600	\$1,500.00	L300	SES
12/5/2014	Meet and confer with NEC regarding finished product data.	0.5	600	\$300.00	L300	SES
12/5/2014	Edits to opposition to defendants' motion requesting interlocutory appeal pursuant to section 1292(b).	2	600	\$1,200.00	L210	SES
12/5/2014	Email to Sony and Toshiba regarding finished product data.	0.2	600	\$120.00	L300	SES
12/5/2014	Call with DPPs regarding opposition to defendants' motion requesting interlocutory appeal pursuant to section 1292(b).	0.3	600	\$180.00	L210	SES
12/5/2014	Management and organization of review team. Draft translation protocol.	2.3	550	\$1,265.00	L110	RSS
12/6/2014	Review notes from document review for items to add to key terms list-9. Document Review-Review and code for liability documents-2.8.	3.7	450	\$1,665.00	L140	JAL
12/8/2014	Organized documents and saved into case file.	1	250	\$250.00	L310	JSD
12/8/2014	Located and pulled documents.	1.2	250	\$300.00	L310	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/8/2014	Proofed joint discovery plan.	0.5	250	\$125.00	L310	JSD
12/8/2014	Filling out Japanese names in search terms list.	8	125	\$1,000.00	L140	AE
12/8/2014	Discovery plan review comment.	1.2	700	\$840.00	L300	JDF
12/8/2014	Review and code of Sony English documents.	8	350	\$2,800.00	L140	HH
12/8/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
12/8/2014	Edit plaintiffs' proposed discovery plan. Communicate with co-counsel regarding same.	1.3	600	\$780.00	L300	SES
12/8/2014	Telephone conversation with DPP (Dan Owen) regarding plaintiffs' proposed search term protocol.	0.8	600	\$480.00	L300	SES
12/8/2014	Review documents and annual filings of GS Yuasa	5.8	600	\$3,480.00	L300	SES
12/8/2014	Organization and management of document review database, team, and coding. Planning and strategy for most efficient review. Answering reviewer questions. Collection and organization of evidence found in review.	8.7	550	\$4,785.00	L300	RSS
12/8/2014	Draft Order re Translation Protocol.	1.6	550	\$880.00	L300	RSS
12/8/2014	Revise final meet and confer letter to send to defendants.	0.5	425	\$212.50	L300	AYS
12/9/2014	Prepared chart of Hitachi-Maxell custodian.	2	250	\$500.00	L300	JSD
12/9/2014	Formatted and proofed plaintiffs' joint discovery plan and served the same.	1.5	250	\$375.00	L310	JSD
12/9/2014	Formatted and proofed letter to defense counsel.	0.3	250	\$75.00	L300	JSD
12/9/2014	Located and pulled GS Yuasa documents.	1	250	\$250.00	L310	JSD
12/9/2014	Filling out Japanese names in search terms list; Weekly reviewer's meeting; Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/9/2014	Edit requests and analyze discovery issues.	1.2	700	\$840.00	L300	JDF
12/9/2014	Review and code of Sony English documents; Batteries meeting.	8	350	\$2,800.00	L140	HH
12/9/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
12/9/2014	Conference call regarding document review3. Document Review-Review and code for liability documents-5.7.	6	450	\$2,700.00	L140	JAL
12/9/2014	Updated Amy's additions into the Batteries Master Cast of Characters.	2.3	150	\$345.00	L140	CL
12/9/2014	Review documents and create list of custodians for Panasonic defendants.	5.2	600	\$3,120.00	L310	SES
12/9/2014	Conference with Panasonic and Sanyo regarding finished product data.	0.6	600	\$360.00	L300	SES
12/9/2014	Summarize notes to file regarding worldwide data; confer with AMS and JDF regarding worldwide data motion to compel.	0.5	600	\$300.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/9/2014	Prepare for and conduct discovery conference with NEC regarding transactional data (both finished product and cell/pack data).	1.3	600	\$780.00	L300	SES
12/9/2014	Organization and management of document review database, team, and coding. Planning and strategy for most efficient review. Answering reviewer questions. Collection and organization of evidence found in review.	7.6	550	\$4,180.00	L300	RSS
12/10/2014	Located and pulled documents.	2	250	\$500.00	L310	JSD
12/10/2014	Prepared chart of Hitachi-Maxell custodian.	2	250	\$500.00	L310	JSD
12/10/2014	Proofed request for interrogatories and requests for document production and served the same.	2.5	250	\$625.00	L310	JSD
12/10/2014	Coding Japanese Sanyo documents; Researching Panasonic custodians.	8	125	\$1,000.00	L140	AE
12/10/2014	Edit requests and analyze discovery issues.	1.2	700	\$840.00	L300	JDF
12/10/2014	Review and code of Sony English documents.	8	350	\$2,800.00	L140	HH
12/10/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
12/10/2014	Review documents produced to DOJ and translations; code for liability documents per reviewer protocol.	6.8	450	\$3,060.00	L140	JAL
12/10/2014	Updated foreign name from Amy's additions into the Batteries Master Cast of Characters.	2.2	150	\$330.00	L140	CL
12/10/2014	Compile documents for attorney review regarding custodians, potential witnesses.	6.1	250	\$1,525.00	L140	BRM
12/10/2014	Draft email to Hitachi Maxell requesting amended response to interrogatory number 3.	0.2	600	\$120.00	L310	SES
12/10/2014	Review documents and create list of custodians for LG Chem defendants.	1.2	600	\$720.00	L300	SES
12/10/2014	Review documents and create list of custodians for Hitachi/Maxell defendants.	0.5	600	\$300.00	L300	SES
12/10/2014	Review documents and create list of custodians for Panasonic defendants. Review Panasonic's response to interrogatory number 3 regarding pricing authority.	0.5	600	\$300.00	L300	SES
12/11/2014	Located documents re custodians.	3	250	\$750.00	L300	JSD
12/11/2014	Proofed letter to counsel.	0.5	250	\$125.00	L300	JSD
12/11/2014	Coding Japanese Sanyo documents; Researching Panasonic custodians and hot documents.	8	125	\$1,000.00	L140	AE
12/11/2014	Edit requests and analyze discovery issues.	2.4	700	\$1,680.00	L300	JDF
12/11/2014	Review and code of Sony English documents.	8	350	\$2,800.00	L140	HH

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/11/2014	Review and code Sony documents from DOJ production.	1	300	\$300.00	L140	ARK
12/11/2014	Created text box ORG chart and added translation contents into text box. Formatted Jongguk and Jessica translation of LGC-MDL0001109PT ORG charts 2007, 2007 BTC, and 2008.	7	150	\$1,050.00	L140	CL
12/11/2014	Compile documents for attorney review regarding custodians, potential witnesses; update case file.	6.4	250	\$1,600.00	L140	BRM
12/11/2014	Meet and confer with Sony defendants regarding finished product data.	0.2	600	\$120.00	L300	SES
12/11/2014	Review documents and create list of custodians for LG Chem defendants.	3.3	600	\$1,980.00	L310	SES
12/11/2014	Review documents and create list of custodians for Panasonic defendants.	4	600	\$2,400.00	L300	SES
12/11/2014	Organization and management of document review database, team, and coding. Planning and strategy for most efficient review. Answering reviewer questions. Collection and organization of evidence found in review.	10.2	550	\$5,610.00	L300	RSS
12/12/2014	Formatted and proofed letters re custodians.	1	250	\$250.00	L300	JSD
12/12/2014	Proofed letter to counsel re meet and confer.	0.7	250	\$175.00	L300	JSD
12/12/2014	Researching Panasonic and Hitachi custodians and hot documents; Translating Hitachi Maxell doc.	8.2	125	\$1,025.00	L140	AE
12/12/2014	Attn. discovery and motion.	1.4	700	\$980.00	L300	JDF
12/12/2014	Review and code of Sony English documents; search and review documents on Yoshida Takahiro (targeted searches).	8	350	\$2,800.00	L140	НН
12/12/2014	Review and code Sony documents from DOJ production.	6	300	\$1,800.00	L140	ARK
12/12/2014	Created text box ORG chart and added translation contents into text box. Formatted Jongguk and Jessica translation of LGC-MDL0001109PT ORG charts 2009-2010.	7	150	\$1,050.00	L140	CL
12/12/2014	Update case file; document review.	1.2	250	\$300.00	L140	BRM
12/12/2014	Review documents and create list of custodians for LG Chem defendants.	4.3	600	\$2,580.00	L300	SES
12/12/2014	Confer with co-counsel regarding component cost data for batteries; draft email to counsel for Toshiba re same.	0.8	600	\$480.00	L300	SES
12/12/2014	Call with Toshiba defendants regarding finished product data.	0.5	600	\$300.00	L300	SES
12/12/2014	Call with J. Manning regarding Panasonic custodians.	0.5	600	\$300.00	L300	SES
12/12/2014	Review documents and create list of custodians for Hitachi/Maxell defendants.	2.5	600	\$1,500.00	L300	SES
12/12/2014	Organization and management of document review database, team, and coding. Planning and strategy for most efficient review. Answering review.	4.2	550	\$2,310.00	L300	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/12/2014	Draft Order re Translation Protocol.	5.8	550	\$3,190.00	L300	RSS
12/12/2014	Revise final meet and confer letter to send to defendants.	0.5	425	\$212.50	L300	AYS
12/13/2014	Organization and management of document review database, team, and coding.	1.5	550	\$825.00	L300	RSS
12/15/2014	Formatted and proofed letter to defense counsel.	0.5	250	\$125.00	L310	JSD
12/15/2014	Formatted and proofed letter to the court.	0.6	250	\$150.00	L210	JSD
12/15/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/15/2014	Prepare for hearing on worldwide transactional data.	1.2	700	\$840.00	L450	JDF
12/15/2014	Review and coding of Sony English documents; Review and coding of doc SEL-DOJE-000099534.	8	350	\$2,800.00	L140	HH
12/15/2014	Review and code Sony documents from DOJ production.	7	300	\$2,100.00	L140	ARK
12/15/2014	Created text box ORG chart and added translation contents into text box; Formatted Jongguk and Jessica translation of LGC-MDL0001109PT ORG charts 2010-2011.	7.5	150	\$1,125.00	L140	CL
12/15/2014	Update case file; document review regarding custodians.	1.7	250	\$425.00	L140	BRM
12/15/2014	Edit letter to Toshiba re finished product data.	1.5	600	\$900.00	L300	SES
12/15/2014	Draft letters to HML and LG Chem regarding custodians. Circulate to DPPs for comment.	1	600	\$600.00	L300	SES
12/15/2014	Draft letter to court summarizing status of finished product negotiations and data. Circulate to co-leads for comment.	3.5	600	\$2,100.00	L300	SES
12/15/2014	Organization and management of document review database, team, and coding.	1.4	550	\$770.00	L300	RSS
12/16/2014	Telephone conference with Mr. Friedman re foreign data.	0.5	900	\$450.00	L300	SWB
12/16/2014	Proofed letters re custodians for Panasonic, Hitachi and LG and served the same.	2.5	250	\$625.00	L300	JSD
12/16/2014	Formatted and proofed letter to the court re finished product data.	1	250	\$250.00	L210	JSD
12/16/2014	Coding Japanese Sanyo documents; Weekly Battery reviewers meeting.	8	125	\$1,000.00	L140	AE
12/16/2014	Prepare for hearing on worldwide transactional data.	1.3	700	\$910.00	L450	JDF
12/16/2014	Batteries meeting; Review and coding of Sony English documents.	8	350	\$2,800.00	L140	HH
12/16/2014	Review and code Sony documents from DOJ production.	8	300	\$2,400.00	L140	ARK
12/16/2014	Formatted Excel chart and printed; Combined LGC-MDL0001109PT ORG charts 2003-2011 into a PDF file.	4.5	150	\$675.00	L140	CL
12/16/2014	Review discovery; update case file.	0.9	250	\$225.00	L140	BRM
12/16/2014	Oversaw filing of letter to the court re finished products. Emails to Sony re	1.1	600	\$660.00	L210	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	same.					
12/16/2014	Call with Andrew Lee re LG Chem custodian list and response to interrogatory number 3; draft follow up email to Mr. Lee re same.	0.2	600	\$120.00	L300	SES
12/16/2014	Amend HML and LG Chem custodian charts. Send letter to LG Chem and HML regarding discovery plan discovery conferences and proposed custodians.	2.3	600	\$1,380.00	L300	SES
12/16/2014	Organization and management of document review database, team, and coding.	1.1	550	\$605.00	L300	RSS
12/17/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/17/2014	Prepare for hearing on worldwide transactional data.	3.2	700	\$2,240.00	L440	JDF
12/17/2014	Review and coding of English documents (previously identified as hot).	8	350	\$2,800.00	L140	HH
12/17/2014	Review and code Sony documents from DOJ production.	11	300	\$3,300.00	L140	ARK
12/17/2014	Update service/distribution lists; update case file; locate third-party companies.	1.3	250	\$325.00	L140	BRM
12/17/2014	Telephone call with co-leads regarding strategy and task list.	0.2	600	\$120.00	L100	SES
12/17/2014	Prepare for hearing on motion to compel worldwide data from Panasonic, Sanyo, Sony and NEC.	3.8	600	\$2,280.00	L400	SES
12/17/2014	Organization and management of document review database, team, and coding.	1.8	550	\$990.00	L300	RSS
12/17/2014	Draft Order re Translation Protocol.	7.6	550	\$4,180.00	L300	RSS
12/18/2014	Proofed letter to counsel.	0.6	250	\$150.00	L300	JSD
12/18/2014	Updated custodian chart.	1	250	\$250.00	L300	JSD
12/18/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/18/2014	Attended hearing per Order on Joint Discovery Letter re Deposition Protocol and Joint Discovery Status Report, Nov. 14, 2014, ECF No. 555.	3.2	700	\$2,240.00	L450	JDF
12/18/2014	Review and coding of English documents (previously identified as hot).	8	350	\$2,800.00	L140	HH
12/18/2014	Review and code Sony documents from DOJ production.	6.5	300	\$1,950.00	L140	ARK
12/18/2014	Review current counsel task list; update case file.	0.4	250	\$100.00	L140	BRM
12/18/2014	Telephone conversation re JDF on worldwide data hearing.	0.5	600	\$300.00	L100	SES
12/18/2014	Email to J. Manning re Panasonic custodians.	0.2	600	\$120.00	L300	SES
12/18/2014	Organization and management of document review database, team, and coding.	2.2	550	\$1,210.00	L300	RSS
12/18/2014	Draft Order re Translation Protocol. Work with counsel to obtain and review edits.	4.7	550	\$2,585.00	L300	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/18/2014	Correspond with named plaintiffs regarding their lithium ion batteries products.	1.1	425	\$467.50	L300	AYS
12/19/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/19/2014	Discovery strategy re data.	1.1	700	\$770.00	L300	JDF
12/19/2014	Review and coding of English documents (previously identified as hot).	8	350	\$2,800.00	L140	HH
12/19/2014	Review and code Sony documents from DOJ production.	7.5	300	\$2,250.00	L140	ARK
12/19/2014	Update case file; update contact lists.	0.8	250	\$200.00	L140	BRM
12/19/2014	Emails with co-leads re edits and comments to Draft Order re Translation Protocol. Conversation with Lin Chan re allocation of work. Review of coding and coding sheet for upcoming wave of production. Update charts re evidence and cast of characters.	2.2	550	\$1,210.00	L300	RSS
12/19/2014	Read and review 1292 motion.	1.5	425	\$637.50	L300	AYS
12/20/2014	Review of edits and comments re Order for Translation Protocol. Prepare draft to send to DPPs.	3.2	550	\$1,760.00	L300	RSS
12/21/2014	Organization and management of document review database, team, and coding.	1.1	550	\$605.00	L300	RSS
12/22/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/22/2014	Review and coding of English documents (previously identified as hot); Review and coding of Sony English documents.	8	350	\$2,800.00	L140	НН
12/22/2014	Review and code Sony documents from DOJ production.	12	300	\$3,600.00	L140	ARK
12/22/2014	Update case file; review defendant discovery responses; document review regarding deposition preparation.	3.8	250	\$950.00	L140	BRM
12/22/2014	Organization of document review database. Management of review, coding, and translation team. Preparation for next wave of discovery. Quality control work of reviewers. Collection of evidence and updating charts re key people and facts. Draft Order re translation protocol for circulation to DPPs and defendants.	9.2	550	\$5,060.00	L300	RSS
12/23/2014	Located and pulled documents.	2	250	\$500.00	L300	JSD
12/23/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/23/2014	Review and coding of Sony English documents; Everlaw feedback session.	8	350	\$2,800.00	L140	HH
12/23/2014	Review and code Sony documents from DOJ production.	12	300	\$3,600.00	L140	ARK
12/23/2014	Update case file; process defendant document production; review defendant discovery responses; document review regarding deposition preparation.	3.5	250	\$875.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/23/2014	Management of review and coding team. Collection and review of evidence found to date. Preparation for next wave of discovery.	6.2	550	\$3,410.00	L300	RSS
12/23/2014	Draft Order re Translation Protocol.	2.5	550	\$1,375.00	L300	RSS
12/24/2014	Coding Japanese Sanyo documents.	3.8	125	\$475.00	L140	AE
12/24/2014	Review and coding of Sony English documents (office closed at noon).	4	350	\$1,400.00	L140	HH
12/24/2014	Review and code Sony documents from DOJ production.	12	300	\$3,600.00	L140	ARK
12/24/2014	Update case file, document production logs.	0.7	250	\$175.00	L140	BRM
12/26/2014	Review and code Sony documents from DOJ production.	4	300	\$1,200.00	L140	ARK
12/29/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/29/2014	Review and coding of Sony English documents.	8	350	\$2,800.00	L140	HH
12/29/2014	Review and code Sony documents from DOJ production.	9.5	300	\$2,850.00	L140	ARK
12/30/2014	Located and pulled documents for deposition.	2	250	\$500.00	L300	JSD
12/30/2014	Coding Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
12/30/2014	Review and coding of Sony English documents.	8	350	\$2,800.00	L140	HH
12/30/2014	Review and code Sony documents from DOJ production.	8.5	300	\$2,550.00	L140	ARK
12/30/2014	Call with expert regarding data, pass-through and proposed declaration.	0.8	600	\$480.00	L210	SES
12/30/2014	Review of draft Order re translation protocol. Edit and incorporate comments from IPPs and DPPs.	3.2	550	\$1,760.00	L300	RSS
12/31/2014	Coding Japanese Sanyo documents.	4	125	\$500.00	L140	AE
12/31/2014	Review and coding of Sony English documents.	4.3	350	\$1,505.00	L140	HH
12/31/2014	Review and code Sony documents from DOJ production.	1	300	\$300.00	L140	ARK
12/31/2014	Review and draft Order re translation protocol. Coordinate with directs on changes. Finalize draft and circulation to defendants.	4.7	550	\$2,585.00	L300	RSS
1/2/2015	Coding Japanese Sanyo documents.	4	125	\$500.00	L140	AE
1/2/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L300	JDF
1/2/2015	Review and code Sony documents from DOJ production.	4	300	\$1,200.00	L140	ARK
1/2/2015	Organization and management of document review and coding team. Collection of evidence and facts and updating on master charts. Planning translation protocol; and planning for next wave of production.	4.2	550	\$2,310.00	L140	RSS
1/3/2015	Review and code Sony documents from DOJ production.	8	300	\$2,400.00	L140	ARK
1/4/2015	Review and code Sony documents from DOJ production.	9	300	\$2,700.00	L140	ARK
1/5/2015	LIB team meeting.	0.1	350	\$35.00	L140	JC
1/5/2015	Reviewing Japanese Sanyo documents; Batteries & ODD meeting.	8	125	\$1,000.00	L140	AE
1/5/2015	Attn. motion.	2.1	700	\$1,470.00	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/5/2015	Review and coding of Sony English documents; Meeting with Shana and Ronnie re: batteries case; Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/5/2015	Review and code Sony documents from DOJ production.	3	300	\$900.00	L140	ARK
1/5/2015	Update case file.	0.4	250	\$100.00	L140	BRM
1/5/2015	Review transcript from hearing on worldwide data argument.	1.3	600	\$780.00	L300	SES
1/5/2015	Meeting with reviewers re case status and assignments.	0.2	600	\$120.00	L110	SES
1/5/2015	Organization and management of document review and coding team. Collection of evidence and facts and updating on master charts. Planning translation protocol; and planning for next wave of production.	4.9	550	\$2,695.00	L140	RSS
1/5/2015	Correspond with named plaintiffs, prepare boxes and media.	2	425	\$850.00	L300	AYS
1/6/2015	Prepared letter to class representatives re plaintiffs' production and prepared return mail boxes.	1	250	\$250.00	L300	JSD
1/6/2015	Researching Japanese Panasonic custodians; Weekly Battery Reviewers meeting; Researching Panasonic custodian Donna Brewster; Reviewing Japanese Sanyo documents.	9	125	\$1,125.00	L140	AE
1/6/2015	Edit requests and analyze discovery issues.	2.1	700	\$1,470.00	L300	JDF
1/6/2015	Review and coding of Sony English documents (complaint phase documents); reviewers meeting.	7.5	350	\$2,625.00	L140	НН
1/6/2015	Review and code Sony documents from DOJ production.	0.2	300	\$60.00	L140	ARK
1/6/2015	Review transcript from hearing on worldwide data argument; research regarding same.	1.3	600	\$780.00	L300	SES
1/6/2015	Draft amended search term protocol.	0.5	600	\$300.00	L300	SES
1/6/2015	Draft amended search term protocol. Follow up call with DPPs re same.	1.5	600	\$900.00	L300	SES
1/6/2015	Prepare for and conduct call with defendants regarding search term protocol.	2	600	\$1,200.00	L300	SES
1/6/2015	Organization and management of document review and coding team. Collection of evidence and facts and updating on master charts. Planning translation protocol; and planning for next wave of production. Weekly call with review team. Call with Nate Cihlar re translations and translation protocol. Call with Hisun Rim re foldering and reviewer issues.	9.1	550	\$5,005.00	L140	RSS
1/7/2015	Reviewing Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
1/7/2015	Edit requests and analyze discovery issues.	2.6	700	\$1,820.00	L300	JDF
1/7/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/7/2015	Update case file; process document production.	0.5	250	\$125.00	L140	BRM
1/7/2015	Draft letter to Panasonic/Sanyo regarding capacity and utilization data.	2.8	600	\$1,680.00	L300	SES
1/7/2015	Call with SDI re capacity and utilization data.	0.3	600	\$180.00	L300	SES
1/7/2015	Prepare for and conduct discovery conference with Panasonic/Sanyo re worldwide data.	3.3	600	\$1,980.00	L300	SES
1/7/2015	Prepare for and conduct discovery conference with Panasonic re custodians.	1	600	\$600.00	L300	SES
1/7/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery and review of search terms.	8.3	550	\$4,565.00	L140	RSS
1/8/2015	Reviewing Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
1/8/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/8/2015	Review and code Sony documents from DOJ production.	0.3	300	\$90.00	L140	ARK
1/8/2015	Amend search term protocol to join defendants and plaintiffs' sections. Review defendants' new proposal.	2.5	600	\$1,500.00	L300	SES
1/8/2015	Call with HML defendants regarding custodians. Amend notes and charts re HML custodians.	1.5	600	\$900.00	L300	SES
1/8/2015	Prepare for and conduct call with Sony regarding capacity and utilization data.	1.3	600	\$780.00	L300	SES
1/8/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Weekly conference call with review management team.	5.9	550	\$3,245.00	L140	RSS
1/9/2015	Catalyst search for a proposed custodian.	1	350	\$350.00	L140	JC
1/9/2015	Calendared due dates.	0.5	250	\$125.00	L110	JSD
1/9/2015	Reviewing Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
1/9/2015	Edit requests and analyze discovery issues.	3.2	700	\$2,240.00	L300	JDF
1/9/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	HH
1/9/2015	Review and code Sony documents from DOJ production.	7.7	300	\$2,310.00	L140	ARK
1/9/2015	Helping Helen sorting large Excel data by name and by year with unformatted Date of Expense by using the formula.	0.5	150	\$75.00	L140	CL
1/9/2015	Organization of discovery responses; update case file.	1.2	250	\$300.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/9/2015	Draft plaintiffs' insert to joint letter brief on search term protocol.	2.8	600	\$1,680.00	L210	SES
1/9/2015	Edit search term protocol; draft email to defense counsel re same.	0.5	600	\$300.00	L300	SES
1/9/2015	Amend chart of custodians for LG Chem and review documents in support of same.	1.6	600	\$960.00	L300	SES
1/9/2015	Prepare for and conduct discovery conference with LG Chem on capacity and utilization data, and list of custodians.	0.7	600	\$420.00	L300	SES
1/9/2015	Conduct discovery conference with Toshiba on capacity and utilization data.	0.4	600	\$240.00	L300	SES
1/9/2015	Prepare for and conduct discovery conference on search term protocol.	1.6	600	\$960.00	L300	SES
1/9/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms.	7.9	550	\$4,345.00	L140	RSS
1/10/2015	Review and code Sony documents from DOJ production.	4.3	300	\$1,290.00	L140	ARK
1/10/2015	Review of questions from review team. Updating evidence charts.	1.5	550	\$825.00	L140	RSS
1/11/2015	Review and code Sony documents from DOJ production.	6.5	300	\$1,950.00	L140	ARK
1/12/2015	Prepared joint letterhead with Saveri, and another with Pearson Simon; formatted and proofed letter to counsel.	1	250	\$250.00	L300	JSD
1/12/2015	Formatted and proofed motion to compel LG Chem.	1	250	\$250.00	L110	JSD
1/12/2015	Proofed letter to LG Chem re custodians and served the same.	1.5	250	\$375.00	L300	JSD
1/12/2015	Scanned plaintiffs' purchase documents and save the same into the plaintiffs' production folder.	2	250	\$500.00	L300	JSD
1/12/2015	Researching Sanyo custodians; Weekly Batteries/ODD meeting; Reviewing Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
1/12/2015	Edit requests and analyze discovery issues.	1.7	700	\$1,190.00	L300	JDF
1/12/2015	Review and coding of Sony English documents (complaint phase documents); Meeting with Shana and Ronnie re: batteries case.	9	350	\$3,150.00	L140	НН
1/12/2015	Review and code Sony documents from DOJ production.	2	300	\$600.00	L140	ARK
1/12/2015	Checked a CT for SDI-B document Ronnie and sent Ronnie a PDF file of Sony-Lib document.	0.5	150	\$75.00	L140	CL
1/12/2015	Update case file; process document productions.	1.6	250	\$400.00	L140	BRM
1/12/2015	Call with DPPs re search term protocol.	0.3	600	\$180.00	L300	SES
1/12/2015	Research and draft plaintiffs' insert to motion to compel search term protocol.	1.9	600	\$1,140.00	L210	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/12/2015	Draft and serve letter to LG Chem re interrogatory response to Rog. 3 (pricing authority). Draft and research motion to compel custodians and interrogatory 3 response from LG Chem.	3.1	600	\$1,860.00	L311	SES
1/12/2015	Prepare for and conduct discovery conference with LG Chem re custodians; follow up call with LG Chem re custodians.	0.5	600	\$300.00	L300	SES
1/12/2015	Draft plaintiffs' insert to search term protocol joint letter brief.	0.7	600	\$420.00	L210	SES
1/12/2015	Meeting with reviewers regarding document review status and assignments.	0.3	600	\$180.00	L300	SES
1/12/2015	Review joint letter brief re LG Chem; email to DPPs re same.	0.5	600	\$300.00	L210	SES
1/12/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Call with Aaron Sheanin re SDI custodians.	8.1	550	\$4,455.00	L140	RSS
1/12/2015	Review custodian information, summarize details.	1.2	425	\$510.00	L300	AYS
1/13/2015	Prepared search terms chart.	1	250	\$250.00	L300	JSD
1/13/2015	Proofed letter re discovery search terms.	2	250	\$500.00	L300	JSD
1/13/2015	Proofed joint status report.	2	250	\$500.00	L300	JSD
1/13/2015	Formatted and proofed motion to compel LG Chem.	1	250	\$250.00	L210	JSD
1/13/2015	Reviewing Japanese Sanyo documents; Weekly Battery reviewers meeting.	8	125	\$1,000.00	L140	AE
1/13/2015	Review and coding of Sony English documents (complaint phase documents); reviewers meeting.	5.5	350	\$1,925.00	L140	НН
1/13/2015	Review and code Sony documents from DOJ production.	3	300	\$900.00	L140	ARK
1/13/2015	Update case file; compile discovery letter cited references.	1.8	250	\$450.00	L140	BRM
1/13/2015	Research and draft motion to compel custodians and interrogatory 3 response from LG Chem.	1	600	\$600.00	L210	SES
1/13/2015	Research and draft plaintiffs' insert to motion to compel search term protocol.	0.5	600	\$300.00	L210	SES
1/13/2015	Conference call with defendants re search term protocol.	0.7	600	\$420.00	L300	SES
1/13/2015	Research and draft plaintiffs' insert to motion to compel search term protocol.	1.8	600	\$1,080.00	L210	SES
1/13/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Weekly call with review team. Call with Jennie Anderson re status of review.	6.2	550	\$3,410.00	L140	RSS
1/13/2015	Review custodian information, summarize details.	3.4	425	\$1,445.00	L300	AYS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/13/2015	Draft descriptions for letter in preparation for motion practice.	4.2	425	\$1,785.00	L300	AYS
1/14/2015	Researching Panasonic custodian; Reviewing Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
1/14/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L300	JDF
1/14/2015	Review and coding of Sony English documents (complaint phase documents).	9.3	350	\$3,255.00	L140	НН
1/14/2015	Review and code Sony documents from DOJ production.	6.5	300	\$1,950.00	L140	ARK
1/14/2015	Saved Batteries rough translation documents in "_All Batteries Translations" shared folder; Renamed Batteries translation documents (RT and CT) in shared folder.	1.3	150	\$195.00	L140	CL
1/14/2015	Process and distribute document productions; update case file; assist attorneys with document requests.	1.6	250	\$400.00	L140	BRM
1/14/2015	Call with HML defendants re capacity and utilization data and custodians.	0.5	600	\$300.00	L300	SES
1/14/2015	Calls with IPP and DPP counsel re case schedule and custodian disputes.	0.3	600	\$180.00	L300	SES
1/14/2015	Prepare for and conduct call with NEC re capacity and utilization data.	0.8	600	\$480.00	L300	SES
1/14/2015	Draft plaintiffs' insert to motion to compel search term protocol.	3.1	600	\$1,860.00	L210	SES
1/14/2015	Draft emails to defendants re search term protocol; follow-up email with Sanyo on worldwide cell and pack data.	0.1	600	\$60.00	L300	SES
1/14/2015	Call with DPPs, IPPs on custodian negotiation status.	0.2	600	\$120.00	L300	SES
1/14/2015	Call with LG Chem re custodians.	0.1	600	\$60.00	L300	SES
1/14/2015	Prepare for and conduct Panasonic call re custodians and capacity/utilization data.	1	600	\$600.00	L300	SES
1/15/2015	Formatted and proofed letters to defense counsel re custodians and search protocol.	2	250	\$500.00	L311	JSD
1/15/2015	Reviewing Japanese Sanyo documents; Researching potential TSST-J custodians (ODD).	8.5	125	\$1,062.50	L140	AE
1/15/2015	Review and coding of Sony English documents (complaint phase documents); Review and coding of Sony Chinese documents.	8.3	350	\$2,905.00	L140	HH
1/15/2015	Review and code Sony documents from DOJ production.	3.5	300	\$1,050.00	L140	ARK
1/15/2015	Research and draft plaintiffs' insert to motion to compel search term protocol.	2.3	600	\$1,380.00	L300	SES
1/15/2015	Draft email to J. Amato re prioritization dispute.	0.5	600	\$300.00	L300	SES
1/15/2015	Draft letters to LG Chem and HML defendants summarizing list of custodians.	0.9	600	\$540.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/15/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Discussion of translation protocol. Weekly review management team call.	8.6	550	\$4,730.00	L140	RSS
1/16/2015	Proofed and fact-checked letter re Panasonic custodians.	2	250	\$500.00	L300	JSD
1/16/2015	Proofed and fact-checked search term protocol brief.	2	250	\$500.00	L300	JSD
1/16/2015	Reviewing Japanese Sanyo documents.	8	125	\$1,000.00	L140	AE
1/16/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/16/2015	Revise plaintiffs' portion of letter to court on search term protocol. Oversaw filing of same.	4.5	600	\$2,700.00	L210	SES
1/16/2015	Review joint report to court re capacity and utilization data.	1.1	600	\$660.00	L300	SES
1/16/2015	Call with SDI re capacity and utilization data.	0.4	600	\$240.00	L300	SES
1/16/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms.	5.6	550	\$3,080.00	L140	RSS
1/17/2015	Review of coding and reviewer progress.	1.6	550	\$880.00	L140	RSS
1/19/2015	Edit requests and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
1/19/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms.	4.9	550	\$2,695.00	L140	RSS
1/20/2015	Proofed letter re Panasonic custodians and served the same.	0.5	250	\$125.00	L300	JSD
1/20/2015	Reviewing Sanyo documents; Weekly Battery reviewers meeting.	8	125	\$1,000.00	L140	AE
1/20/2015	Review and coding of Sony English documents (complaint phase documents); reviewers meeting.	8	350	\$2,800.00	L140	HH
1/20/2015	Lithium Ion Batteries Team Conference Call.	0.3	300	\$90.00	L140	ARK
1/20/2015	Process document productions; update logs and case file.	1.4	250	\$350.00	L140	BRM
1/20/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Call with HBSS reviewer team. Call with DPPs to prep for meet and confer with defendants on translation protocol.	8.1	550	\$4,455.00	L140	RSS
1/21/2015	Calendared due dates.	0.2	250	\$50.00	L110	JSD
1/21/2015	Reviewing Sanyo documents.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/21/2015	Edit requests and analyze discovery issues.	1.7	700	\$1,190.00	L300	JDF
1/21/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/21/2015	Review and code Sony documents from DOJ production.	11.7	300	\$3,510.00	L140	ARK
1/21/2015	Call with co-counsel re scheduling.	1	600	\$600.00	L300	SES
1/21/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Meet and confer re translation protocol with DPPs and defendants. Prepared documents for call.	7.9	550	\$4,345.00	L140	RSS
1/22/2015	Reviewing Sanyo documents.	8	125	\$1,000.00	L140	AE
1/22/2015	Review and coding of Sony English documents (complaint phase documents).	6.3	350	\$2,205.00	L140	НН
1/22/2015	Review and code Sony documents from DOJ production.	3	300	\$900.00	L140	ARK
1/22/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery and search terms. Weekly call with review team.	6.9	550	\$3,795.00	L140	RSS
1/23/2015	Formatted and proofed letter to all defense counsel and served the same.	6	250	\$1,500.00	L300	JSD
1/23/2015	Formatted and proofed letter to defense counsel re search term agreement and served the same.	1	250	\$250.00	L300	JSD
1/23/2015	Reviewing Sanyo documents.	7.7	125	\$962.50	L140	AE
1/23/2015	Edit requests and analyze discovery issues.	1.5	700	\$1,050.00	L300	JDF
1/23/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/23/2015	Emails with experts re cell/pack data. Email to Sanyo re request to meet and confer on cell/pack data. Confer with DPPs re same.	2	600	\$1,200.00	L390	SES
1/23/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Review of translation protocol meet and confer items.	9.7	550	\$5,335.00	L140	RSS
1/24/2015	Review team management.	2.2	550	\$1,210.00	L140	RSS
1/26/2015	LIB team meeting.	0.1	350	\$35.00	L140	JC
1/26/2015	Weekly Battery reviewers meeting; Coding Sanyo documents.	6.5	125	\$812.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/26/2015	Edit requests and analyze discovery issues.	2	700	\$1,400.00	L300	JDF
1/26/2015	Review and coding of Sony English documents (complaint phase documents); meeting with Shana.	8	350	\$2,800.00	L140	HH
1/26/2015	Review and code Sony documents from DOJ production.	7.5	300	\$2,250.00	L140	ARK
1/26/2015	Update case file; review case calendar dates.	0.8	250	\$200.00	L120	BRM
1/26/2015	Edit letter to Panasonic/Sanyo re data.	0.3	600	\$180.00	L300	SES
1/26/2015	Managed and organized document review and coding. Draft translation protocol. Review of coder work product. Collection of evidence and updating charts. Planning for next wave of discovery; search terms. Updating evidence charts.	10.1	550	\$5,555.00	L140	RSS
1/27/2015	Coding Sanyo documents.	3	125	\$375.00	L140	AE
1/27/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/27/2015	Review and code Sony documents from DOJ production.	7.5	300	\$2,250.00	L140	ARK
1/27/2015	Update case file; review discovery.	1.2	250	\$300.00	L140	BRM
1/27/2015	Prepare for call with Panasonic re data. T/c with A. Sheanin re worldwide data issue and strategy.	1.9	600	\$1,140.00	L390	SES
1/27/2015	Research HML custodian issue.	0.2	600	\$120.00	L300	SES
1/27/2015	Review team management and organization. Planning for next wave of review. Communicating assignments to foreign language team. Revising draft for translation protocol. Updating and building evidence charts for	5.8	550	\$3,190.00	L140	RSS
1/28/2015	case. Coding Sanyo documents; Translating Japanese Panasonic documents.	8.5	125	\$1,062.50	L140	AE
1/28/2015	Edit requests and analyze discovery issues.	1.5	700	\$1,050.00	L300	JDF
1/28/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/28/2015	Prepare for and conduct discovery conference with Panasonic and Sanyo re worldwide cell and pack data.	1	600	\$600.00	L390	SES
1/28/2015	Call with co-leads re assignments and strategy.	1	600	\$600.00	L110	SES
1/28/2015	Updating master evidence charts. Review team organization and management.	9.1	550	\$5,005.00	L140	RSS
1/29/2015	Translating Japanese Panasonic documents.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/29/2015	Review and coding of Sony English documents (complaint phase documents); Email Patrick, Jongguk and Jessica re: Shana's email on issues related to Dell and HP pricing, and supplemental motion for class certification.	8	350	\$2,800.00	L140	НН
1/29/2015	Process document productions; update case file.	1	250	\$250.00	L140	BRM
1/29/2015	Meet and confer with defendants regarding prioritization proposal.	1	600	\$600.00	L390	SES
1/29/2015	Management of review and coding team. Weekly call with review management team re shutting down review. Discussion of informal translations and staffing. Review of draft translation protocol. Updating master charts.	7	550	\$3,850.00	L140	RSS
1/30/2015	Translating Japanese Panasonic documents; Coding Sanyo documents.	8.5	125	\$1,062.50	L140	AE
1/30/2015	Review and coding of Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	НН
1/30/2015	Draft letter to defendant regarding transactional data. Draft e-mails to defendants requesting meet and confers regarding transactional data productions. E-mails to co-lead counsel regarding same.	4.8	600	\$2,880.00	L300	SES
1/31/2015	Review of edits by Aaron Sheanin and Brendan Glackin re translation protocol. Communications re expert materials provision.	4.1	550	\$2,255.00	L140	RSS
2/1/2015	Review of timesheets and emails from reviewers.	0.2	550	\$110.00	L140	RSS
2/2/2015	Team meeting.	0.3	350	\$105.00	L140	JC
2/2/2015	Translate Japanese Sony documents; team meeting.	8	125	\$1,000.00	L140	AE
2/2/2015	Review and code Sony English documents (complaint phase documents); team meeting with Ms. Scarlett and Ms. Spiegel.	8	350	\$2,800.00	L140	НН
2/2/2015	Saved rough translation documents in Batteries shared folder; Filled in fields in the Batteries Master List.	2.8	150	\$420.00	L140	CL
2/2/2015	Update case file.	0.4	250	\$100.00	L140	BRM
2/2/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	7.2	550	\$3,960.00	L140	RSS
2/3/2015	Case review.	2	900	\$1,800.00	L190	SWB
2/3/2015	De-duped proposed search terms and prepared chart thereof.	2.5	250	\$625.00	L300	JSD
2/3/2015	Translate Japanese Sony documents; team meeting.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/3/2015	Edit requests and analyze discovery issues.	2.7	700	\$1,890.00	L300	JDF
2/3/2015	Review and code Sony English documents (complaint phase documents).	8	350	\$2,800.00	L140	HH
2/3/2015	Meeting with Ronnie; Filled in fields in the Batteries Master List; List all Sony-privilege documents on the Privilege chart; Downloaded and Saved rough translation documents in Batteries shared folder.	8	150	\$1,200.00	L140	CL
2/3/2015	Prepare for and attend conference call with Toshiba regarding proposed schedule and discovery for motion for summary judgment on withdrawal and statute of limitations. Follow up with notes and letter re same. Review custodian information.	1.2	600	\$720.00	L300	SES
2/3/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	6.4	550	\$3,520.00	L120	RSS
2/4/2015	Proofed letter to defense counsel.	0.5	250	\$125.00	L300	JSD
2/4/2015	Translate Japanese Sony documents; research CA contacts; translate Japanese NEC document.	8	125	\$1,000.00	L140	AE
2/4/2015	Review and code Sony English documents (complaint phase documents); Review and search for CA contacts documents/projects.	8	350	\$2,800.00	L140	НН
2/4/2015	List all Sony-privilege documents on the Privilege chart; Saved rough translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
2/4/2015	Update case file; process document productions.	0.7	250	\$175.00	L140	BRM
2/4/2015	Draft letter to F. Hogue re discovery, ESI and Toshiba's proposed schedule for the motion for summary judgment.	1.8	600	\$1,080.00	L300	SES
2/4/2015	Conference call with co-leads on strategy and assignments.	0.5	600	\$300.00	L100	SES
2/4/2015	Prepare for and attend conference call with Toshiba regarding proposed schedule and discovery for motion for summary judgment on withdrawal and statute of limitations.	1	600	\$600.00	L300	SES
2/4/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	6.2	550	\$3,410.00	L120	RSS
2/5/2015	Proofed letter to defense counsel and served the same.	0.6	250	\$150.00	L300	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/5/2015	Translate Japanese NEC document.	8	125	\$1,000.00	L140	AE
2/5/2015	Review and search for CA contacts documents/projects.	8	350	\$2,800.00	L140	HH
2/5/2015	List all Sony-Apple Redaction documents on the Privilege chart; Saved rough translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
2/5/2015	Process document productions; update case file; update production logs.	1.8	250	\$450.00	L140	BRM
2/5/2015	Finalize Order re translation protocol. Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	10.1	550	\$5,555.00	L120	RSS
2/6/2015	Telephone conference with counsel for Sony re settlement.	0.5	900	\$450.00	L160	SWB
2/6/2015	Translate Japanese NEC document.	6.7	125	\$837.50	L140	AE
2/6/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L300	JDF
2/6/2015	Review and search for CA contacts documents/projects.	8	350	\$2,800.00	L140	HH
2/6/2015	List all Sanyo Defendants-Privilege documents on the Privilege chart.	8	150	\$1,200.00	L140	CL
2/6/2015	Call with co-leads on expert strategy.	1.5	600	\$900.00	L100	SES
2/6/2015	Call with possible expert regarding pass-through.	0.5	600	\$300.00	L340	SES
2/6/2015	Prepare for and conduct call with LG Chem on cost data and capacity/utilization data.	0.5	600	\$300.00	L300	SES
2/6/2015	Prepare for and conduct call with NEC on cost data, finished product data and capacity/utilization data.	1.3	600	\$780.00	L300	SES
2/6/2015	Prepare for and conduct call with Sony on cost data, finished product data and capacity/utilization data.	1.3	600	\$780.00	L300	SES
2/6/2015	Prepare for and conduct call with Toshiba on cost data, finished product data and capacity/utilization data.	1	600	\$600.00	L300	SES
2/6/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	8.1	550	\$4,455.00	L120	RSS
2/9/2015	Team meeting.	0.3	350	\$105.00	L140	JC
2/9/2015	Prepared third parties subpoenas chart; prepared notice, subpoenas and attachment As.	3	250	\$750.00	L300	JSD
2/9/2015	Proofed joint status report.	0.6	250	\$150.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/9/2015	Translate Japanese NEC document; team meeting; Draft company code name search terms.	8	125	\$1,000.00	L140	AE
2/9/2015	Edit requests and analyze discovery issues.	3	700	\$2,100.00	L300	JDF
2/9/2015	Review and search for CA contacts documents/project, and putting all CA contacts documents into an excel sheet; Team meeting.	8	350	\$2,800.00	L140	НН
2/9/2015	List all Sony Privilege documents on the Privileged chart; team meeting.	8	150	\$1,200.00	L140	CL
2/9/2015	Draft summaries for joint statement to the Court regarding capacity and utilization data.	1	600	\$600.00	L300	SES
2/9/2015	Interview possible expert re pass-through.	0.5	600	\$300.00	L300	SES
2/9/2015	Review correspondence re transactional data meet and confer process.	1	600	\$600.00	L300	SES
2/9/2015	Create and edit search term list.	2.3	600	\$1,380.00	L300	SES
2/9/2015	Meet and confer call with defendants re finalizing order re translation protocol. Conversations with DPPs re finalizing order re translation protocol.	0.9	550	\$495.00	L120	RSS
2/9/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	8.5	550	\$4,675.00	L120	RSS
2/9/2015	Weekly group call with Shana Scarlett and HBSS review team. Go over assignments and tasks for the week.	0.5	550	\$275.00	L120	RSS
2/10/2015	Prepared subpoenas, attachment A, and notice; served the to counsel of records same, and arranged for their service to various third parties.	6	250	\$1,500.00	L300	JSD
2/10/2015	Translate Japanese NEC document; Draft company code name search terms.	8	125	\$1,000.00	L140	AE
2/10/2015	Edit requests and analyze discovery issues.	3.2	700	\$2,240.00	L300	JDF
2/10/2015	Review and search for CA contacts documents/project.	8	350	\$2,800.00	L140	HH
2/10/2015	Battery LG Chem translation.	8	125	\$1,000.00	L140	JWJ
2/10/2015	List all Sony Privilege documents on the Privileged chart.	7.7	150	\$1,155.00	L140	CL
2/10/2015	Interview possible expert re pass-through.	1	600	\$600.00	L340	SES
2/10/2015	Edit and send emails to defendants re capacity and utilization data in advance of joint report to the Court.	0.7	600	\$420.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/10/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	7.1	550	\$3,905.00	L120	RSS
2/10/2015	Finalizing translation protocol.	2.9	550	\$1,595.00	L120	RSS
2/11/2015	Proofed Joint Status Report.	1	250	\$250.00	L302	JSD
2/11/2015	Translate Japanese NEC document; research CA contacts.	7	125	\$875.00	L140	AE
2/11/2015	Review and search for CA contacts documents/project.	7	350	\$2,450.00	L140	HH
2/11/2015	Battery LG Chem translation.	4	125	\$500.00	L140	JWJ
2/11/2015	List all Sony Privilege documents on the Privileged chart; Saved rough translation documents in the Batteries shared folder.	7.7	150	\$1,155.00	L140	CL
2/11/2015	Update case file; update document production log; assist with status report.	1.4	250	\$350.00	L140	BRM
2/11/2015	Call with co-leads re strategy and assignments.	1	600	\$600.00	L300	SES
2/11/2015	Prepare final version of report to court on capacity and utilization data. Incorporate edits from Sony and LG Chem. Oversaw filing of same.	0.7	600	\$420.00	L300	SES
2/11/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	6.1	550	\$3,355.00	L120	RSS
2/12/2015	Prepared notice and subpoenas to various third parties.	0.5	250	\$125.00	L300	JSD
2/12/2015	Translate Japanese pricing documents.	2.5	125	\$312.50	L140	AE
2/12/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L300	JDF
2/12/2015	Review and search for CA contacts documents/project.	2	350	\$700.00	L140	HH
2/12/2015	List all Sony Privilege documents on the Privileged chart; Filled in fields in the Batteries Master List; Saved rough translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
2/12/2015	Prepare for hearing on search term protocol.	2	600	\$1,200.00	L300	SES
2/12/2015	Call with L. Chan re search terms. Amend search term list.	0.5	600	\$300.00	L300	SES
2/12/2015	Finalize Order re translation protocol.	2.7	550	\$1,485.00	L120	RSS
2/13/2015	Work on LIB search terms.	4.5	350	\$1,575.00	L140	JC
2/13/2015	Proofed stipulation and proposed order.	0.5	250	\$125.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/13/2015	Prepared subpoenas, attachment A, and notice; served counsel of records same, and arranged for their service to various third parties.	4.5	250	\$1,125.00	L300	JSD
2/13/2015	Organize Batteries search terms; translate Japanese Panasonic document.	7	125	\$875.00	L140	AE
2/13/2015	Review and search for CA contacts documents/project.	2.8	350	\$980.00	L140	HH
2/13/2015	Filled in fields in the Batteries Master List; Saved rough translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
2/13/2015	Call with expert re tasks and assignments.	0.2	600	\$120.00	L340	SES
2/13/2015	Conference call with A. Sheanin re	1	600	\$600.00	L300	SES
2/13/2015	Draft proposed stipulation regarding expert discovery.	1.2	600	\$720.00	L300	SES
2/13/2015	Edit search term list.	1.8	600	\$1,080.00	L300	SES
2/13/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	7	550	\$3,850.00	L120	RSS
2/16/2015	Prepare for hearing on search term protocol - disputed provision over qualitative sampling.	4.5	600	\$2,700.00	L300	SES
2/17/2015	Translate and organize LIB search terms; Translate NEC document.	8	125	\$1,000.00	L140	AE
2/17/2015	Attn. discovery; expert.	3.5	700	\$2,450.00	L300	JDF
2/17/2015	Review and search for CA contacts documents/project.	8	350	\$2,800.00	L140	HH
2/17/2015	Filled in fields in the Batteries Master List; Saved rough translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
2/17/2015	Assist with hearing preparation; update case file; process document production and distribute to experts; Update case file.	2.4	250	\$600.00	L140	BRM
2/18/2015	Translate NEC document; Translate and organize LIB search terms; Code Sanyo documents.	5.5	125	\$687.50	L140	AE
2/18/2015	Review and search for CA contacts documents/project; Review and coding of Sony English documents.	8	350	\$2,800.00	L140	НН
2/18/2015	Filled in fields in the Batteries Master List.	8	150	\$1,200.00	L140	CL
2/18/2015	Status call with co-leads.	0.3	600	\$180.00	L100	SES
2/18/2015	Prepare for hearing on search term protocol - disputed provision over qualitative sampling.	3.8	600	\$2,280.00	L300	SES
2/19/2015	Edit requests and analyze discovery issues.	1.2	700	\$840.00	L300	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/19/2015	Translate two Panasonic transactional data files and search online to confirm foreign company names.	4.5	350	\$1,575.00	L140	HH
2/19/2015	Updated Batteries translation notations on the Master List; Filled in fields in the Batteries Master List.	8	150	\$1,200.00	L140	CL
2/19/2015	Update case file, case calendar.	0.3	250	\$75.00	L140	BRM
2/19/2015	Prepare for and conduct argument for IPPs at hearing on search term protocol before Magistrate Judge.	4.5	600	\$2,700.00	L300	SES
2/19/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Draft Order re translation protocol.	9.1	550	\$5,005.00	L120	RSS
2/20/2015	Located and pulled case laws for SES.	0.5	250	\$125.00	L210	JSD
2/20/2015	Translate two Panasonic transactional data files and search online to confirm foreign company names.	3.7	350	\$1,295.00	L140	НН
2/20/2015	Saved rough translation documents in the Batteries shared folder; Filled in fields in the Batteries Master List.	7.8	150	\$1,170.00	L140	CL
2/20/2015	Update case file; process document production; review status of third-party subpoenas.	1.6	250	\$400.00	L140	BRM
2/20/2015	Draft letter to Toshiba re schedule and motion for summary judgment.	2	600	\$1,200.00	L300	SES
2/20/2015	Communicate with third parties Agilent, PC Connection, ASI Corporation, Newegg re third party subpoenas.	0.8	600	\$480.00	L300	SES
2/20/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process. Cross-reference deposition protocol with translation protocol for Aaron Sheanin attendance at hearing.	7.5	550	\$4,125.00	L120	RSS
2/23/2015	Attn. expert.	1.2	700	\$840.00	L130	JDF
2/23/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Meeting w/ team; Meeting w/ Ronnie; Copied Panasonic and Sanyo search terms from Word into the Search Worksheet; Coded translation documents on Catalyst.	8	150	\$1,200.00	L140	CL
2/23/2015	Update case file; prepare and file transcript order; locate subsidiary corporate headquarters.	1.3	250	\$325.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/23/2015	Call with co-leads re expert strategy.	0.3	600	\$180.00	L130	SES
2/23/2015	Draft letter to Toshiba re schedule and motion for summary judgment.	1.5	600	\$900.00	L300	SES
2/23/2015	Interview with potential experts.	0.8	600	\$480.00	L130	SES
2/23/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	8.1	550	\$4,455.00	L120	RSS
2/24/2015	Prepared settlement meeting chart.	0.3	250	\$75.00	L300	JSD
2/24/2015	Scanned and saved to case file proofs of service of subpoenas.	1	250	\$250.00	L300	JSD
2/24/2015	Reviewed WOJ invoices for processing and payment.	0.6	250	\$150.00	L300	JSD
2/24/2015	Survey Samsung documents for SES.	0.5	350	\$175.00	L140	HH
2/24/2015	Filled in fields in the Batteries Master Evidence Chronology & List.	4	150	\$600.00	L140	CL
2/24/2015	Call with Toshiba re proposed motion for summary judgment.	0.6	600	\$360.00	L300	SES
2/24/2015	Amend search term list for SDI.	0.2	600	\$120.00	L300	SES
2/24/2015	Telephone call with DPPs re search terms.	0.5	600	\$300.00	L300	SES
2/24/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	6.1	550	\$3,355.00	L120	RSS
2/25/2015	Updated Batteries third party chart.	0.3	250	\$75.00	L300	JSD
2/25/2015	Edit requests and analyze discovery issues.	2.5	700	\$1,750.00	L300	JDF
2/25/2015	Filled in fields in the Batteries Master Evidence Chronology & List.	8	150	\$1,200.00	L140	CL
2/25/2015	Process document productions; update case file; update custodian tracking charts.	2.6	250	\$650.00	L140	BRM
2/25/2015	Call with Asus on data in response to subpoena.	0.2	600	\$120.00	L300	SES
2/25/2015	Review search terms. Conference call with DPPs re same.	2	600	\$1,200.00	L300	SES
2/25/2015	Conference call with co-leads re strategy and settlement.	0.3	600	\$180.00	L100	SES
2/25/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	9	550	\$4,950.00	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/26/2015	Formatted and proofed search terms protocol and efiled the same.	1	250	\$250.00	L210	JSD
2/26/2015	Coded translation documents on Catalyst; Filled in fields in the Batteries Master Evidence Chronology & List.	8	150	\$1,200.00	L140	CL
2/26/2015	Update case file; update and revised custodian production tracking charts.	2.2	250	\$550.00	L140	BRM
2/26/2015	Update case file; prepare and file proposed search term protocol; process document productions; review status of third-party subpoenas.	4.4	250	\$1,100.00	L140	BRM
2/26/2015	Email to LCHB	0.1	600	\$60.00	L300	SES
2/26/2015	Call with Panasonic and cell and pack data.	0.3	600	\$180.00	L300	SES
2/26/2015	Review documents and rank Panasonic custodians in priority order.	1.4	600	\$840.00	L300	SES
2/26/2015	Review documents and rank LG Chem custodians in priority order.	3	600	\$1,800.00	L300	SES
2/26/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	7.2	550	\$3,960.00	L120	RSS
2/27/2015	Scanned and saved to case file proofs of service of subpoenas.	1	250	\$250.00	L300	JSD
2/27/2015	Formatted and proofed letters to defense counsel re prioritization of custodians and served the same.	2	250	\$500.00	L210	JSD
2/27/2015	Attn. expert and discovery.	2.2	700	\$1,540.00	L340	JDF
2/27/2015	Saved translation documents in the Batteries shared folder; Filled in fields in the Batteries Master Evidence Chronology & List.	8	150	\$1,200.00	L140	CL
2/27/2015	Update case file; update master custodian tracking chart; process document production.	1.2	250	\$300.00	L140	BRM
2/27/2015	Draft letters to HML, Panasonic and LG Chem re ranking of custodians.	2.5	600	\$1,500.00	L300	SES
2/27/2015	Review documents	1.8	600	\$1,080.00	L300	SES
2/27/2015	Manage document review team and database. Organize and put together evidence found on key words, key people, key facts. Oversee translation process and plan for next wave of review. Update case master charts. Address issues with specific reviewer work product. Manage informal translation process.	4.1	550	\$2,255.00	L120	RSS
3/2/2015	Proofed letter to third party re document production subpoena.	1	250	\$250.00	L300	JSD
3/2/2015	Proofed letter to defense counsel and served the same.	1	250	\$250.00	L300	JSD
3/2/2015	Calendared due dates and cleaned up calendar.	0.3	250	\$75.00	L300	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/2/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Meeting; Updating and tagging most current version of translation documents in the database; Saved translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
3/2/2015	Process document productions; update case file; review status of third-party subpoenas.	2.5	250	\$625.00	L140	BRM
3/2/2015	Telephone and emails to third parties re subpoenas for pass-through data, including CompUSA, Apple, Newegg, Best Buy.	2	600	\$1,200.00	L300	SES
3/2/2015	Amend proposed search terms.	1.5	600	\$900.00	L300	SES
3/2/2015	Amend proposed search terms.	0.5	600	\$300.00	L300	SES
3/2/2015	Call with AMS re Toshiba transactional data.	0.1	600	\$60.00	L300	SES
3/2/2015	Managed review and translation tasks. Planned and organized efforts to translate transactional data. Updated case charts and organized evidence found to date. Plan for next wave of review. Call with Nate Cihlar re translation planning and staffing.	7.5	550	\$4,125.00	L120	RSS
3/3/2015	Proofed, fact and auto-checked motion to compel Toshiba; prepared declaration, pulled and arranged exhibits; transmitted motion to counsel for comment; efiled the same.	3.5	250	\$875.00	L210	JSD
3/3/2015	Reviewed the service of third party subpoenas and followed up those without proof of service.	0.7	250	\$175.00	L300	JSD
3/3/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Saved translation documents in the Batteries shared folder; Updating and tagging most current version of translation documents in the database.	8	150	\$1,200.00	L140	CL
3/3/2015	Update case file; review status of third-party subpoenas.	1	250	\$250.00	L140	BRM
3/3/2015	Prepare for and call with Toshiba on worldwide cell and pack data and withholding of foreign sales.	0.8	600	\$480.00	L300	SES
3/3/2015	Ordering for watch list of LG, Panasonic and HML.	2	600	\$1,200.00	L300	SES
3/3/2015	Call with Best Buy re third party dataset.	0.7	600	\$420.00	L300	SES
3/3/2015	Search term call with DPPs; email to co-leads re same .	0.6	600	\$360.00	L300	SES
3/3/2015	Planning for informal translations of transactional data. Managed review and translation tasks. Planned and organized efforts to translate transactional data. Updated case charts and organized evidence found to date. Plan for next wave of review. Collection of evidence from database.	8	550	\$4,400.00	L120	RSS
3/4/2015	Updated third party chart.	0.5	250	\$125.00	L300	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/4/2015	Translating Japanese transaction documents	5	125	\$625.00	L140	AE
3/4/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Updating and tagging most current version of translation documents in the database.	8	150	\$1,200.00	L140	CL
3/4/2015	Update case file; process document productions; document review.	2.3	250	\$575.00	L140	BRM
3/4/2015	Email to Toshiba re motion for summary judgment and discovery (interrogatories) re same.	0.2	600	\$120.00	L300	SES
3/4/2015	Weekly call with co-leads.	0.5	600	\$300.00	L100	SES
3/4/2015	Call with ASUS re third party discovery.	0.2	600	\$120.00	L300	SES
3/4/2015	Casemap/Everlaw demos for new software.	1.8	600	\$1,080.00	L300	SES
3/4/2015	Call with Newegg re third party subpoena; follow up email to Newegg re same.	0.5	600	\$300.00	L300	SES
3/4/2015	Update master charts. Collection of evidence for charts from database.	1.2	550	\$660.00	L120	RSS
3/5/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Downloaded and saved FT Panasonic translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
3/5/2015	Email to Sony re corrupt data.	0.2	600	\$120.00	L300	SES
3/5/2015	Email to Fry's re extension of time on subpoena. Follow up with Biz.com and PC Connection re third party subpoenas.	0.4	600	\$240.00	L300	SES
3/5/2015	Edit search terms.	2	600	\$1,200.00	L300	SES
3/5/2015	Review manager team call. Managed review and translation tasks. Planned and organized efforts to translate transactional data. Updated case charts and organized evidence found to date. Plan for next wave of review.	6.4	550	\$3,520.00	L140	RSS
3/6/2015	Updated third party chart.	0.5	250	\$125.00	L300	JSD
3/6/2015	Translating Japanese transaction documents	4	125	\$500.00	L140	AE
3/6/2015	Filled in fields in the Batteries Master Evidence Chronology & List.	8	150	\$1,200.00	L140	CL
3/6/2015	Email to Hitachi re custodian prioritization; requesting discovery conference; confer with DPPs re same.	1.5	600	\$900.00	L300	SES
3/6/2015	Call with Bizcom re third party subpoena.	0.1	600	\$60.00	L300	SES
3/6/2015	email D. Harvey re same.	0.4	600	\$240.00	L300	SES
3/6/2015	Prepare for and attend call with DPPs on search terms; amend search term list.	2.7	600	\$1,620.00	L300	SES
3/6/2015	Review of translations and update charts.	2	550	\$1,100.00	L120	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/9/2015	Translate Sanyo transaction data Work out SDI Battery search terms.	7.2	125	\$900.00	L140	AE
3/9/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Downloaded and saved FT Panasonic translation documents in the Batteries shared folder; Coding and tagging most current version of full rough translation documents in the database.	8	150	\$1,200.00	L140	CL
3/9/2015	Call with Apple, Gammatech and Fry's re data.	1	600	\$600.00	L300	SES
3/9/2015	Review of OEM subpoena draft. Comparison of plaintiff and defendants' edits.	6.1	550	\$3,355.00	L120	RSS
3/10/2015	Status update.	1	900	\$900.00	L120	SWB
3/10/2015	Reviewed WOJ invoices for service of subpoenas and submit the same to accounting for processing and payment.	1.5	250	\$375.00	L300	JSD
3/10/2015	Translating Sanyo transaction data documents Revising SDI Battery search terms.	8	125	\$1,000.00	L140	AE
3/10/2015	Translate two transactional data documents from LG and online search to confirm English names for the foreign companies.	5.5	350	\$1,925.00	L140	НН
3/10/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Formatting 67 documents of the DPPs translations of PANA 334-400.	8	150	\$1,200.00	L140	CL
3/10/2015	Process document productions; update case file.	1.2	250	\$300.00	L140	BRM
3/10/2015	Call with DAPs, DPPs, FL Defendants re sealing of record.	0.3	600	\$180.00	L300	SES
3/10/2015	Call with Fujitsu America re third party subpoena.	0.1	600	\$60.00	L300	SES
3/10/2015	Amend search terms.	1.6	600	\$960.00	L300	SES
3/10/2015	Call with L. Chin/DPPs re search terms; amend search terms.	1.5	600	\$900.00	L300	SES
3/10/2015	Email Walmart re third party subpoena.	0.1	600	\$60.00	L300	SES
3/10/2015	Edit and oversaw filing of joint brief with Toshiba re transactional data.	1.5	600	\$900.00	L300	SES
3/10/2015	Updated master charts. Planning for next wave. Review of translation lists.	1.7	550	\$935.00	L120	RSS
3/11/2015	Proofed letter to the court re Toshiba sales data and efiled the same.	2.5	250	\$625.00	L210	JSD
3/11/2015	Revising SDI Battery search terms; Translating Sanyo transaction data documents	8	125	\$1,000.00	L140	AE
3/11/2015	Filled in fields in the Batteries Master Evidence Chronology & List; Downloaded full rough translation documents and saved in the Batteries shared folder; Coding and tagging most current version of full rough translation documents in the database.	8	150	\$1,200.00	L140	CL
3/11/2015	Assist with preparation and filing of joint letter discovery brief.	2	250	\$500.00	L300	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/11/2015	Draft letter to Toshiba re motion for summary judgment and discovery.	3.8	600	\$2,280.00	L300	SES
3/11/2015	Prepare for call with HML re custodians.	0.8	600	\$480.00	L300	SES
3/11/2015	Call with Nate Cihlar re translation planning and coordination with directs. Managed review and translation tasks. Planned and organized efforts to translate transactional data. Updated case charts and organized evidence found to date. Plan for next wave of review.	7.5	550	\$4,125.00	L120	RSS
3/12/2015	Calendared due dates.	0.3	250	\$75.00	L300	JSD
3/12/2015	Translating Sanyo transaction data documents Phone meeting w/DPPs about revising All Defendants Battery search terms; Revising All Defendants Battery search terms.	8.2	125	\$1,025.00	L140	AE
3/12/2015	Saved full rough translation documents in the Batteries shared folder; Coding and tagging most current version of full rough translation documents in the database.	8	150	\$1,200.00	L140	CL
3/12/2015	Attend hearing re MTC LG Chem's response to interrogatory on guilty plea.	4.2	600	\$2,520.00	L300	SES
3/12/2015	Call with DPPs re search terms.	0.5	600	\$300.00	L300	SES
3/12/2015	Amend search term list; draft email to defense group re same.	4.2	600	\$2,520.00	L300	SES
3/12/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	7.5	550	\$4,125.00	L140	RSS
3/13/2015	Reviewed docket and updated service list.	1	250	\$250.00	L210	JSD
3/13/2015	Prepared and efiled transcript request.	0.5	250	\$125.00	L210	JSD
3/13/2015	Translating Sanyo transaction data documents	7.8	125	\$975.00	L140	AE
3/13/2015	Coding and tagging most current version of full rough translation documents in the database; Saved full rough translation documents in Batteries shared folder.	8	150	\$1,200.00	L140	CL
3/13/2015	Prepare for and attend call with HML on ordering of custodian productions.	0.8	600	\$480.00	L300	SES
3/13/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	7.1	550	\$3,905.00	L140	RSS
3/16/2015	LIB team meeting.	0.1	350	\$35.00	L140	JC
3/16/2015	Translating Sanyo transaction data documents	7.5	125	\$937.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/16/2015	Coding and tagging most current version of full rough translation documents in the database; Searching document info and recording the TCAC Paragraph Cross Reference on the Master Chronology List; Meeting w/ team, meeting w/ Ronnie; Compressed the full rough translation documents of SANYO 201-210 and uploaded to Hightail and sent the link to Amy.	7.3	150	\$1,095.00	L140	CL
3/16/2015	Update case file.	0.8	250	\$200.00	L140	BRM
3/16/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database. Call with Lin Chan re Sawa Nagano (Japanese reviewer); Call with Hisun Rim re same. Meeting with HBSS batteries team re upcoming projects and staffing.	5	550	\$2,750.00	L140	RSS
3/17/2015	Updated third parties chart.	0.5	250	\$125.00	L300	JSD
3/17/2015	Translating and sending Sanyo transaction data documents for experts; Coding Sanyo documents; Meeting with Ronnie about LiB Projects; Translating NEC transaction data documents	8	125	\$1,000.00	L140	AE
3/17/2015	Translate transactional data documents from Sanyo - SANYO0000213-218.	5.5	350	\$1,925.00	L140	HH
3/17/2015	Searching document info and recording the TCAC Paragraph Cross Reference on the Master Chronology List; Compressed the full rough translation documents of SANYO 241-245 and uploaded to Hightail and sent the link to Amy.	8	150	\$1,200.00	L140	CL
3/17/2015	Assist with related-case transactional data review; update case file.	1.8	250	\$450.00	L140	BRM
3/17/2015	Meet and confer with SED International re third party subpoena.	1.2	600	\$720.00	L300	SES
3/17/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database. Call with Nate Cihlar re translation planning and coordination.	6.2	550	\$3,410.00	L140	RSS
3/18/2015	Assisting coworker with Japanese terms; Translating NEC transaction data documents for experts; Working on search term glossary for outside translation vendors.	7.7	125	\$962.50	L140	AE
3/18/2015	Translate transactional data documents from Sanyo - SANYO0000213-218.	8	350	\$2,800.00	L140	HH
3/18/2015	Searching document info and recording the TCAC Paragraph Cross Reference on the Master Chronology List; Downloaded and saved translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
3/18/2015	Document collection regarding named custodians; update case file.	2.1	250	\$525.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/18/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database. Call with Lin Chan re timeline for incoming productions.	5.1	550	\$2,805.00	L140	RSS
3/19/2015	Updated third party chart.	0.3	250	\$75.00	L300	JSD
3/19/2015	Prepared third party subpoenas and notice.	2	250	\$500.00	L300	JSD
3/19/2015	Working on search term glossary for outside translation vendors; Translating NEC transaction data documents for experts.	8	125	\$1,000.00	L140	AE
3/19/2015	Translate transactional data documents from Sanyo - SANYO0000213-218.	5.7	350	\$1,995.00	L140	HH
3/19/2015	Searching document info and recording the TCAC Paragraph Cross Reference on the Master Chronology List; Downloaded and saved translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
3/19/2015	Process third-party data productions; update logs and case file.	1.6	250	\$400.00	L140	BRM
3/19/2015	Review LG Chem documents to respond to request to drop Myung Hwan Kim as a custodian.	0.2	600	\$120.00	L300	SES
3/19/2015	Call with plaintiffs re search terms.	0.3	600	\$180.00	L300	SES
3/19/2015	Call with defendants re search terms.	0.8	600	\$480.00	L300	SES
3/19/2015	Call re with joint plaintiff group.	0.4	600	\$240.00	L300	SES
3/19/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database. Weekly review team manager call.	2	550	\$1,100.00	L140	RSS
3/20/2015	Prepared third party subpoenas and notice and served the same.	3.5	250	\$875.00	L300	JSD
3/20/2015	Calendared due dates.	0.3	250	\$75.00	L300	JSD
3/20/2015	Translating NEC transaction data documents	8	125	\$1,000.00	L140	AE
3/20/2015	Searching document info and recording the TCAC Paragraph Cross Reference on the Master Chronology List; Downloaded and saved translation documents in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
3/20/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	4.6	550	\$2,530.00	L140	RSS
3/23/2015	Translating NEC transaction data documents Researching documents and answering Japanese-related questions for coworkers.	7.5	125	\$937.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/23/2015	Translate transactional data documents NECB00000005 and NECB00000028; Meeting with Shana and Ronnie.	6.8	350	\$2,380.00	L140	HH
3/23/2015	Searching document info and recording the TCAC Paragraph Cross Reference on the Master Chronology List.	3.2	150	\$480.00	L140	CL
3/23/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database. Internal HBSS meeting re staffing and upcoming projects.	3.1	550	\$1,705.00	L140	RSS
3/24/2015	Created chart for defendants' affiliates/headquarters.	6.5	250	\$1,625.00	L300	JSD
3/24/2015	Translating NEC transaction data documents	7.3	125	\$912.50	L140	AE
3/24/2015	Translate transactional data documents NECB00000028 and NECB00000029.	8	350	\$2,800.00	L140	НН
3/24/2015	Saved full rough translation documents in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
3/24/2015	Review and update custodian list.	0.2	600	\$120.00	L300	SES
3/25/2015	Updated chart for defendants' affiliates/headquarters.	2	250	\$500.00	L300	JSD
3/25/2015	Translating NEC transaction data documents	8	125	\$1,000.00	L140	AE
3/25/2015	Translate transactional data doc NECB00000029.	8	350	\$2,800.00	L140	HH
3/25/2015	Download recent pleadings and correspondence; update case file.	2	250	\$500.00	L140	BRM
3/25/2015	Review proposed stipulation re MSJ schedule; Review discovery correspondence; revise Toshiba custodians.	1.8	600	\$1,080.00	L300	SES
3/25/2015	Call with defendants re search terms.	0.2	600	\$120.00	L300	SES
3/25/2015	Prepare for and attend co-lead call re strategy.	1	600	\$600.00	L300	SES
3/25/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	8.1	550	\$4,455.00	L140	RSS
3/26/2015	Translating NEC transaction data documents	7.3	125	\$912.50	L140	AE
3/26/2015	Translate transactional data doc NECB00000029.	7	350	\$2,450.00	L140	HH
3/26/2015	Searched for SH Kwak documents on the Master Chronology List and created SH Kwak chart for Ronnie; Saved full rough translation documents in the Batteries shared folder.	1.3	150	\$195.00	L140	CL
3/26/2015	Process document productions; update case file.	1.3	250	\$325.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/26/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database. Weekly review manager team call.	6	550	\$3,300.00	L140	RSS
3/27/2015	Updated third parties chart.	0.5	250	\$125.00	L300	JSD
3/27/2015	Translating NEC transaction data documents	6	125	\$750.00	L140	AE
3/27/2015	Translate transactional data doc NECB00000029.	8	350	\$2,800.00	L140	HH
3/27/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	1	550	\$550.00	L140	RSS
3/30/2015	Translate NEC transaction data documents for experts.	8	125	\$1,000.00	L140	AE
3/30/2015	Translate transactional data - doc LGC-MDL0005405; Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	НН
3/30/2015	Process document productions; update discovery logs; update case file.	1.5	250	\$375.00	L140	BRM
3/30/2015	Call with Newegg re third party subpoena.	0.3	600	\$180.00	L300	SES
3/30/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	2.2	550	\$1,210.00	L140	RSS
3/31/2015	Translate NEC transaction data documents	6	125	\$750.00	L140	AE
3/31/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
3/31/2015	Saved full rough translation documents LG Chem, Sony, and NEC in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
3/31/2015	Call with SDI on search terms.	1	600	\$600.00	L300	SES
3/31/2015	Updated master charts. Plan for next wave of review and search strategies. Manage translations and details re staffing informal translations and sharing translation work with directs. Review and collection of evidence from database.	5.5	550	\$3,025.00	L140	RSS
4/1/2015	HBSS team meeting with reviewers and Shana Scarlett. Review of manual and materials for next phase of review. Update of charts and collection of evidence. Review of translation assignments. Managing overall review and coding process.	4.7	550	\$2,585.00	L140	RSS
4/2/2015	Prepared defendants' affiliates/HQ chart based on interrogatory responses.	3	250	\$750.00	L312	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/2/2015	Reviewed WOJ charges for service of third party subpoenas.	0.6	250	\$150.00	L311	JSD
4/2/2015	Proofed, fact and auto-checked motion to compel Toshiba; prepared declaration, pulled and arranged exhibits.	1.5	250	\$375.00	L210	JSD
4/2/2015	Translate NEC transaction data documents	1.5	125	\$187.50	L140	AE
4/2/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/2/2015	Saved full rough translation documents LG Chem, Sony, and NEC in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
4/2/2015	Edit search terms for Sony.	1	600	\$600.00	L300	SES
4/2/2015	Prepare for and attend call with Toshiba re discovery and schedule for motion for summary judgment.	1.3	600	\$780.00	L300	SES
4/2/2015	Review of manual and materials for next phase of review. Update of charts and collection of evidence. Review of translation assignments. Managing overall review and coding process.	3	550	\$1,650.00	L140	RSS
4/3/2015	Proofed, fact and auto-checked motion to compel Toshiba; prepared declaration, pulled and arranged exhibits; transmitted motion to counsel for comment; efiled the same.	3.5	250	\$875.00	L210	JSD
4/3/2015	Translate NEC transaction data documents	5	125	\$625.00	L140	AE
4/3/2015	Saved full rough translation documents LG Chem, Sony, and NEC in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
4/3/2015	Review of manual and materials for next phase of review. Update of charts and collection of evidence. Review of translation assignments. Managing overall review and coding process.	2.8	550	\$1,540.00	L140	RSS
4/6/2015	Proofread LIB document translations.	8	350	\$2,800.00	L140	JC
4/6/2015	Coordinated with vendor re service of the subpoenas; updated third party chart.	0.7	250	\$175.00	L311	JSD
4/6/2015	Translating NEC transaction data documents	7	125	\$875.00	L140	AE
4/6/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/6/2015	Downloaded and saved full rough translation documents LG Chem, Sony, and NEC in the Batteries shared folder.	0.5	150	\$75.00	L140	CL
4/6/2015	Update case file; process document production.	2.3	250	\$575.00	L140	BRM
4/6/2015	Call with Paul Vieth re US Cellular production of data.	2	600	\$1,200.00	L300	SES
4/7/2015	Proofread LIB document translations.	6	350	\$2,100.00	L140	JC
4/7/2015	Translating NEC transaction data documents	8	125	\$1,000.00	L140	AE
4/7/2015	Translate transactional data - doc NECB00000029; Translation requests from	8.7	350	\$3,045.00	L140	HH

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Amy.					
4/7/2015	Saved full rough translation documents in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
4/7/2015	Process document production; update case file.	1.5	250	\$375.00	L140	BRM
4/7/2015	Prepare for and attend settlement conference with Sony defendants at CPM.	3	600	\$1,800.00	L300	SES
4/7/2015	Prepare for and attend call with LG Chem re search terms.	0.2	600	\$120.00	L300	SES
4/7/2015	Prepare for and attend call with NEC re search terms.	1	600	\$600.00	L300	SES
4/8/2015	Updated meet and confer chart.	0.5	250	\$125.00	L390	JSD
4/8/2015	Updated defendants' affiliates/HQ chart based on interrogatory responses.	4	250	\$1,000.00	L312	JSD
4/8/2015	Translating NEC transaction data documents	6.5	125	\$812.50	L140	AE
4/8/2015	Translate transactional data - doc NECB00000029.	6.8	350	\$2,380.00	L140	HH
4/8/2015	Saved full rough translation documents in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
4/8/2015	Process document productions; update case file.	1.6	250	\$400.00	L140	BRM
4/8/2015	Review Sony data for status.	0.5	600	\$300.00	L300	SES
4/8/2015	Call with Demetrius re status of discovery.	0.5	600	\$300.00	L300	SES
4/9/2015	Updated defendants' affiliates/HQ chart based on interrogatory responses.	6	250	\$1,500.00	L312	JSD
4/9/2015	Translating NEC transaction data documents	5.7	125	\$712.50	L140	AE
4/10/2015	Updated meet and confer chart.	0.5	250	\$125.00	L390	JSD
4/10/2015	Prepared transcript order form and efiled the same.	0.4	250	\$100.00	L210	JSD
4/10/2015	Translating NEC transaction data documents	8	125	\$1,000.00	L140	AE
4/10/2015	Translate transactional data - doc NECB00000029.	6.5	350	\$2,275.00	L140	HH
4/10/2015	Saved full rough translation documents in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
4/13/2015	Updated service list.	0.5	250	\$125.00	L210	JSD
4/13/2015	Reviewed invoices re service of third party subpoenas.	0.6	250	\$150.00	L311	JSD
4/13/2015	Translating NEC transaction data documents	7.5	125	\$937.50	L140	AE
4/13/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/13/2015	Saved full rough translation documents in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
4/13/2015	Telephone call with David Tsai - Shuttle and ECS.	0.3	600	\$180.00	L300	SES
4/13/2015	Voicemail and email to third party US Cellular.	0.2	600	\$120.00	L300	SES
4/13/2015	Call with third party FIC.	0.2	600	\$120.00	L300	SES
4/13/2015	Call with co-leads re discovery and strategy.	0.5	600	\$300.00	L300	SES
4/13/2015	Email exchange with third party PC Connection re subpoena.	0.3	600	\$180.00	L300	SES
4/13/2015	Conference call with third-party Fry's.	0.1	600	\$60.00	L300	SES
4/13/2015	Call with N Cihlar re translation process. Call with DPPs re translation coordination.	0.3	550	\$165.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/14/2015	Updated defendants' affiliates/HQ chart based on interrogatory responses.	2	250	\$500.00	L312	JSD
4/14/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/15/2015	Coordinated with process server re service of subpoenas; updated meet and confer chart.	2	250	\$500.00	L311	JSD
4/15/2015	Updated defendants' affiliates/HQ chart based on interrogatory responses.	4	250	\$1,000.00	L312	JSD
4/15/2015	Translate transactional data - doc NECB00000029.	3	350	\$1,050.00	L140	HH
4/15/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Assist with locating information for Toshiba.	7.9	550	\$4,345.00	L140	RSS
4/16/2015	Update case file; process document productions.	1.4	250	\$350.00	L140	BRM
4/16/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Assist with locating information for Toshiba. Led weekly management team call. Manage translation process and assignments.	8.2	550	\$4,510.00	L140	RSS
4/17/2015	Running targeted searches on Kurihara & Nitta Pioneer production and sending hot documents.	8	125	\$1,000.00	L140	AE
4/17/2015	Translate transactional data - doc NECB00000029.	1	350	\$350.00	L140	HH
4/17/2015	Downloaded and saved full rough translation documents of NEC, SONY, and Toshiba in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
4/17/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Assist with locating information for Toshiba. Lead weekly management team call. Manage translation process and assignments.	9.1	550	\$5,005.00	L140	RSS
4/20/2015	LIB team meeting.	0.1	350	\$35.00	L140	JC
4/20/2015	Uploaded and transmitted LG Chem production to co-counsel.	0.5	250	\$125.00	L311	JSD
4/20/2015	Edit requests and analyze discovery issues.	3.5	700	\$2,450.00	L300	JDF
4/20/2015	Translate transactional data - doc NECB00000029; Translate transactional data - doc NECB00000045; Meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	НН
4/20/2015	LIB SDI translation proofreading; Group meeting lead by Shana and Ronnie.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/20/2015	Batteries meeting; Emailed Helpdesk to release a large zip file of Batteries translation documents that has been quarantined by system, and then saved in the Batteries shared folder.	1	150	\$150.00	L140	CL
4/20/2015	Telephone conferences with Acer, CDW and ABT hardware re subpoena.	1.9	600	\$1,140.00	L300	SES
4/20/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments. Call with Lin Chan re expected arguments for Toshiba motion for summary judgment.	8.6	550	\$4,730.00	L140	RSS
4/21/2015	Fact investigation; attn. discovery.	2.5	700	\$1,750.00	L300	JDF
4/21/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/21/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/21/2015	Updated full rough translation documents on the Master Chronology List.	1.5	150	\$225.00	L140	CL
4/21/2015	Call with co-leads re strategy and discovery.	0.5	600	\$300.00	L300	SES
4/21/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments.	6.1	550	\$3,355.00	L140	RSS
4/22/2015	Translation Review of LIB documents.	1.5	350	\$525.00	L140	JC
4/22/2015	Prepared defendants' affiliates/HQ chart based on interrogatory responses.	5	250	\$1,250.00	L312	JSD
4/22/2015	Formatted and proofed letter to defense counsel re search terms.	1	250	\$250.00	L312	JSD
4/22/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/22/2015	Download and organize correspondence and discovery; process document production; update case file.	2.3	250	\$575.00	L140	BRM
4/22/2015	Call with Sony re search terms.	0.5	600	\$300.00	L300	SES
4/22/2015	Call with co-leads re strategy and discovery.	0.7	600	\$420.00	L300	SES
4/22/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments.	10.1	550	\$5,555.00	L140	RSS
4/23/2015	Translation Review of LIB documents; Translation of LIB documents.	8	350	\$2,800.00	L140	JC
4/23/2015	Formatted and proofed plaintiffs' objections and responses to defendants' first set of interrogatories.	3	250	\$750.00	L312	JSD
4/23/2015	Translating NEC transaction doc	3.3	125	\$412.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/23/2015	Edit requests and analyze discovery issues.	3.2	700	\$2,240.00	L300	JDF
4/23/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/23/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/23/2015	Saved Batteries final translation documents from Ronnie in the Batteries shared folder. Updated Translation Status of final translation documents on the Master Chronology List; Sorted the Master Chronology List for Toshiba MSJ documents and created a new chart for Toshiba MSJ documents and sent to Ronnie.	0.8	150	\$120.00	L140	CL
4/23/2015	Process document production; create email group for production processing; update case file.	1.6	250	\$400.00	L140	BRM
4/23/2015	Edit search terms for Sony.	0.8	600	\$480.00	L300	SES
4/23/2015	Call with IPP co-leads re Toshiba motion for summary judgment.	0.4	600	\$240.00	L120	SES
4/23/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments. Led weekly review management team call.	10.1	550	\$5,555.00	L140	RSS
4/24/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
4/24/2015	Translating NEC transaction documents	8	125	\$1,000.00	L140	AE
4/24/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/24/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/24/2015	Received updated version of PCTs translation documents from Shinae; Received PCs and PCTs translation documents from Nathan; Compared CTs and PCTs translation documents in the Batteries shared folder and replaced with the updated ones; Received final translation documents from Richard, emailed Helpdesk to release a large zip file of final translation documents that has been quarantined by system; Renamed and saved in the Batteries shared folder; Remove previous full rough translation documents out of the Batteries shared folder.	0.5	150	\$75.00	L140	CL
4/24/2015	Update case file; process document production; update production logs.	1.4	250	\$350.00	L140	BRM
4/24/2015	Edit Panasonic search terms.	0.2	600	\$120.00	L300	SES
4/24/2015	Call with Toshiba re component cost data.	0.5	600	\$300.00	L300	SES
4/24/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and	10.1	550	\$5,555.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	assignments.					
4/25/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/27/2015	LIB Team Meeting; Translation Review of LIB documents.	7.5	350	\$2,625.00	L140	JC
4/27/2015	Updated third party chart.	0.3	250	\$75.00	L311	JSD
4/27/2015	Translating NEC transaction document	6.3	125	\$787.50	L140	AE
4/27/2015	Edit requests and analyze discovery issues.	3.5	700	\$2,450.00	L300	JDF
4/27/2015	Translate transactional data - doc NECB00000029; Meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	НН
4/27/2015	LIB SDI translation proofreading; Group Meeting lead by Shana.	8	125	\$1,000.00	L140	JWJ
4/27/2015	Updated full rough translation documents on the Batteries Master Chronology List; Checking and Filling in paragraph # between Master Chronology List and Batteries 3AC Citation Cross Reference Sheet.	6.8	150	\$1,020.00	L140	CL
4/27/2015	Process document productions; update case file.	1.2	250	\$300.00	L140	BRM
4/27/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments. Call with N Cihlar re translation procedure. Weekly HBSS team meeting.	7.9	550	\$4,345.00	L140	RSS
4/27/2015	Communicate with class representatives and prepare discovery responses.	4	425	\$1,700.00	L312	AYS
4/28/2015	Translation Review of LIB documents.	7	350	\$2,450.00	L140	JC
4/28/2015	Translating NEC transaction document	8	125	\$1,000.00	L140	AE
4/28/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/28/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/28/2015	Checking and Filling in paragraph numbers between Master Chronology List and Batteries 3AC Citation Cross Reference Sheet; Saved revised translation documents from Akiko to the Batteries shared folder.	5.8	150	\$870.00	L140	CL
4/28/2015	Process document productions; update case file; update production logs.	2	250	\$500.00	L140	BRM
4/28/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments. Call with Catalyst re next wave of review, creating folders, and creating collections.	9.5	550	\$5,225.00	L140	RSS
4/28/2015	Communicate with class representatives and prepare discovery responses.	2.9	425	\$1,232.50	L312	AYS
4/29/2015	Translation Review of LIB documents.	8	350	\$2,800.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/29/2015	Updated affiliates/HQ chart.	3	250	\$750.00	L311	JSD
4/29/2015	Translating NEC transaction document	8	125	\$1,000.00	L140	AE
4/29/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/29/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/29/2015	Checking and Filling in paragraph numbers between Master Chronology List and Batteries 3AC Citation Cross Reference Sheet. Sent the Batteries 3AC Citation Cross Reference Sheet to Ronnie; Meeting with Ronnie; Emailed Helpdesk to release a large zip file of NECT full rough translation documents from Shinae that has been quarantined by system and saved in the Batteries shared folder.	7.7	150	\$1,155.00	L140	CL
4/29/2015	Update case file; process document productions; audit third-party productions sent to damages experts.	1.9	250	\$475.00	L140	BRM
4/29/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments.	4.1	550	\$2,255.00	L140	RSS
4/29/2015	Communicate with class representatives and prepare discovery responses.	2.3	425	\$977.50	L312	AYS
4/30/2015	Translation Review of LIB documents.	7	350	\$2,450.00	L140	JC
4/30/2015	Prepared subpoenas to third parties and notice; served, and transmitted the same to the process server for service.	2.5	250	\$625.00	L311	JSD
4/30/2015	Updated third party chart; reviewed third parties that responded to subpoena and drafted letter to those that did not.	3.5	250	\$875.00	L311	JSD
4/30/2015	Translating NEC transaction document for experts; Coding Toshiba document production.	8	125	\$1,000.00	L140	AE
4/30/2015	Edit requests and analyze discovery issues.	3.2	700	\$2,240.00	L300	JDF
4/30/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
4/30/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
4/30/2015	Updated Transaction Data status in the Catalyst; Updated full rough translation documents on the Batteries-Master Chronology List; Downloaded and saved Hitachi transaction data for IPPs in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
4/30/2015	Process document productions; update case file; review status of third-party subpoenas; assist with preparation of additional subpoenas.	2.2	250	\$550.00	L140	BRM
4/30/2015	Prepare for and attend call with LG Chem re search terms. Amend LG Chem search terms.	1.7	600	\$1,020.00	L300	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/30/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments.	3.1	550	\$1,705.00	L140	RSS
4/30/2015	Organize and plan for next wave of review. Plan search strategy. Review of coding manual and form. Organize review staffing needs. Update charts. Manage and collect evidence for charts. Manage translation process and assignments. Led weekly review management team call.	1.4	550	\$770.00	L140	RSS
4/30/2015	Communicate with class representatives and prepare discovery responses.	2.1	425	\$892.50	L312	AYS
5/1/2015	Prepared subpoena for production of documents to LCHB, proofed Attachment A thereto, and served the same.	0.7	250	\$175.00	L311	JSD
5/1/2015	Prepared subpoena for production of documents to LCHB, proofed Attachment A thereto, and served the same.	0.7	250	\$175.00	L311	JSD
5/1/2015	Prepared letters to third parties non-responsive to the document production subpoenas and mailed the same.	2.5	250	\$625.00	L311	JSD
5/1/2015	Updated affiliates chart with discovery responses.	1	250	\$250.00	L312	JSD
5/1/2015	Coding Toshiba document production and creating spreadsheet of hot documents; Translating Hitachi Maxell org chart documents	6.5	125	\$812.50	L140	AE
5/1/2015	Translate transactional data - doc NECB00000029.	7	350	\$2,450.00	L140	HH
5/1/2015	Updating transaction data status in the Catalyst; Updated translation status field on pulled out all documents on the chart, and sent to Ronnie; Updated translation status and added Cited documents from Batteries -Memo the Master List.	8	150	\$1,200.00	L140	CL
5/1/2015	Process document productions; review native files regarding potential corrupted documents; update case file.	5.3	250	\$1,325.00	L140	BRM
5/1/2015	Call with Toshiba's counsel regarding discovery and proposed early motion for summary judgment.	0.5	600	\$300.00	L390	SES
5/1/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data Updating coding instructions and materials. Collection of evidence and facts for master charts.	5	550	\$2,750.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/1/2015	Planning for next wave of discovery; organizing and managing review and translations. Working with DPPs re translation coordination. Drafting materials for review team; review of evidence to date in database. Collection and assimilation of facts and evidence for case management charts.	5	550	\$2,750.00	L140	RSS
5/1/2015	Communicate with class representatives and prepare discovery responses.	1.6	425	\$680.00	L300	AYS
5/4/2015	Team meeting; Translation review of LIB documents.	7.7	350	\$2,695.00	L140	JC
5/4/2015	Prepared subpoenas for production of documents to third parties, and notice thereof.	1.5	250	\$375.00	L311	JSD
5/4/2015	Proofed letters to third parties and served the same.	2.5	250	\$625.00	L311	JSD
5/4/2015	Updated affiliates chart with discovery responses.	2	250	\$500.00	L312	JSD
5/4/2015	Translating Hitachi Maxell org chart documents for experts.	6.3	125	\$787.50	L140	AE
5/4/2015	Translate transactional data - doc NECB00000029; Meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	НН
5/4/2015	Added Cited documents from Batteries -Memo Saved Batteries - CT documents from Richard in the Batteries shared folder; Saved full rough translation documents from Shinae in the Batteries shared folder; Downloaded and saved SONY-LIB-DATA from Shinae in the Batteries shared folder; Updated Batteries – CT documents on the Master Chronology List; Meeting; Filling in fields on the Master Chronology List; Updating and coding transactional data status in the Catalyst; Merged three charts of the hot documents list into one chart and saved as Toshiba Summary Judgment Review.	8	150	\$1,200.00	L140	CL
5/4/2015	Update case file; review defendant-produced native files for corrupted files; process document productions.	5.1	250	\$1,275.00	L140	BRM
5/4/2015	Call with Sony on finished products cost data production.	0.1	600	\$60.00	L390	SES
5/4/2015	Prepare for and attend call with Panasonic/Sanyo re search terms.	1	600	\$600.00	L390	SES
5/4/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data for experts. Updating coding instructions and materials. Collection of evidence and facts for master charts.	7.9	550	\$4,345.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/4/2015	Planning for next wave of discovery; organizing and managing review and translations. Working with DPPs re translation coordination. Drafting materials for review team; review of evidence to date in database. Collection and assimilation of facts and evidence for case management charts. Meeting with HBSS review team. Meeting with Chan Lovell re charts and administrative projects.	9.1	550	\$5,005.00	L140	RSS
5/4/2015	Communicate with class representatives, log information, and prepare discovery responses.	1.2	425	\$510.00	L312	AYS
5/5/2015	Translation review of LIB documents.	8	350	\$2,800.00	L140	JC
5/5/2015	Prepared document production subpoenas to third parties; served the same to defense counsel and arrange for their service.	2.5	250	\$625.00	L311	JSD
5/5/2015	Translating Hitachi Maxell org chart documents for experts.	8	125	\$1,000.00	L140	AE
5/5/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
5/5/2015	Updating and coding PANA and SANYO transactional data status in the Catalyst.	8	150	\$1,200.00	L140	CL
5/5/2015	Update case file; coordinate with experts regarding third-party, defendant data productions.	1.5	250	\$375.00	L140	BRM
5/5/2015	Conference call with Sony regarding search terms.	0.5	600	\$300.00	L390	SES
5/5/2015	Updating master charts.	0.2	550	\$110.00	L140	RSS
5/6/2015	Translation review of LIB documents.	8	350	\$2,800.00	L140	JC
5/6/2015	Updated affiliates chart with discovery responses.	2	250	\$500.00	L312	JSD
5/6/2015	Translating Hitachi Maxell org chart documents	8	125	\$1,000.00	L140	AE
5/6/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
5/6/2015	Updating and coding Sony-LIB transactional data status in the Catalyst; Saved HML-P full rough translation documents from Amy in the Batteries Shared folder.	8	150	\$1,200.00	L140	CL
5/6/2015	Update case file.	0.5	250	\$125.00	L120	BRM
5/6/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data Updating coding instructions and materials. Collection of evidence and facts for master charts.	8.3	550	\$4,565.00	L140	RSS
5/7/2015	Translation review of LIB documents; LIB document translation.	8	350	\$2,800.00	L140	JC
5/7/2015	Updated affiliates chart with discovery responses.	3.5	250	\$875.00	L312	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/7/2015	Reviewed invoices related to service of third party subpoenas.	2	250	\$500.00	L311	JSD
5/7/2015	Translating Hitachi Maxell org chart documents	8	125	\$1,000.00	L140	AE
5/7/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
5/7/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/7/2015	Updating and coding Sony-LIB transactional data status in the Catalyst; Catalyst training; Check off the Master List documents in Routing coding form in the Catalyst; Updating new translation documents on the Master Chronology List; Formatted PNA-CIV0000305078PT and Sent to Shana; Updated formatting doc on the ODD Translation Chart Master.	8.5	150	\$1,275.00	L140	CL
5/7/2015	Update case file; review status of third-party productions.	1	250	\$250.00	L140	BRM
5/7/2015	Conference call with Office Depot re subpoena.	0.1	600	\$60.00	L390	SES
5/7/2015	Prepare for and attend discovery conference with Panasonic re questions on PNA's purchase and sales data for batteries.	0.8	600	\$480.00	L390	SES
5/7/2015	Prepare for and attend with LG Chem re search terms.	0.5	600	\$300.00	L390	SES
5/7/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data for experts. Updating coding instructions and materials. Collection of evidence and facts for master charts.	9.3	550	\$5,115.00	L140	RSS
5/8/2015	LIB document translation.	8	350	\$2,800.00	L140	JC
5/8/2015	Formatted and proofed stipulation and proposed order to amend complaint and voluntary dismissal.	0.5	250	\$125.00	L210	JSD
5/8/2015	Coordinate with vendor re service of third party subpoenas.	0.5	250	\$125.00	L311	JSD
5/8/2015	Updated third parties chart.	0.3	250	\$75.00	L311	JSD
5/8/2015	Translating Hitachi Maxell org chart documents	8	125	\$1,000.00	L140	AE
5/8/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
5/8/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/8/2015	Check off the Master List documents in Routing coding form in the Catalyst.	7.5	150	\$1,125.00	L140	CL
5/8/2015	Prepare for and attend discovery conference with NEC and NEC Tokin re search terms.	0.8	600	\$480.00	L390	SES
5/8/2015	Call with co-lead counsel re class certification discovery, strategy, and update on assignments.	0.5	600	\$300.00	L120	SES
5/11/2015	Team meeting; LIB document translation.	6.3	350	\$2,205.00	L140	JC
5/11/2015	Translating Hitachi Maxell org chart documents team meeting.	7.1	125	\$887.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/11/2015	Translate transactional data - doc NECB00000029; Meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	HH
5/11/2015	LIB SDI Korean document translation; team meeting with Ms. Scarlett and Ms. Spiegel.	8	125	\$1,000.00	L140	JWJ
5/11/2015	Check off the Master List documents in Routing coding form in Catalyst; Team meeting and meeting with Ronnie; Put all documents in the First Level Review into the 2014 Review Set Collection in Catalyst.	8	150	\$1,200.00	L140	CL
5/11/2015	Prepare for and attend discovery conference with LG Chem re: search terms.	0.3	600	\$180.00	L390	SES
5/11/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data for experts. Updating coding instructions and materials. Collection of evidence and facts for master charts.	4	550	\$2,200.00	L140	RSS
5/11/2015	Communicate with and log information regarding named plaintiffs.	1.5	425	\$637.50	L312	AYS
5/12/2015	LIB document translation.	8	350	\$2,800.00	L140	JC
5/12/2015	Updated third parties chart.	0.2	250	\$50.00	L311	JSD
5/12/2015	Translating Hitachi Maxell org chart documents for experts; Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
5/12/2015	Translate transactional data - doc NECB00000029.	8	350	\$2,800.00	L140	HH
5/12/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/12/2015	Put the list of documents on Transactional Data Log into the Transactional Data Collection in Catalyst; Saved NECB full rough translation documents from Shinae in the Batteries shared folder; Saved HML-P full rough translation documents from Shinichi in the Batteries shared folder; Saved HML-P full rough translation documents from Amy in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
5/12/2015	Call with Amazon re third party subpoena.	0.2	600	\$120.00	L390	SES
5/12/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data for experts. Updating coding instructions and materials. Collection of evidence and facts for master charts.	1.2	550	\$660.00	L140	RSS
5/13/2015	LIB document translation.	8	350	\$2,800.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/13/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	5.7	125	\$712.50	L140	AE
5/13/2015	Translate transactional data - doc NECB00000029; Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/13/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/13/2015	Put the list of documents on Transactional Data Log into the Transactional Data Collection in Catalyst; Saved LGC-MDL full rough translation documents from Shinae in the Batteries shared folder; Saved HML-P full rough translation documents from Chikako in the Batteries shared folder; Saved S-DOJ full rough translation documents from Akiko in the Batteries shared folder; Check off the Master List documents in Routing coding form in the Catalyst.	8	150	\$1,200.00	L140	CL
5/13/2015	Process document productions; update case file; review production regarding data files for experts.	2.4	250	\$600.00	L140	BRM
5/13/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data for experts. Updating coding instructions and materials. Collection of evidence and facts for master charts.	3.1	550	\$1,705.00	L140	RSS
5/14/2015	LIB document translation.	7	350	\$2,450.00	L140	JC
5/14/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	7.2	125	\$900.00	L140	AE
5/14/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/14/2015	Review and translate SDI documents for use at deposition.	7.5	125	\$937.50	L140	JWJ
5/14/2015	Put the list of documents on Transactional Data Log into the Transactional Data Collection in Catalyst; Updating new translation documents on the Master Chronology List; Check off the Master List documents in Routing coding form in the Catalyst; Added Tracy Lee memo to The Toshiba Summary Judgment Review chart.	8	150	\$1,200.00	L140	CL
5/14/2015	Call with co-lead counsel re class certification discovery, strategy, and update on assignments.	0.5	600	\$300.00	L120	SES
5/14/2015	Prepare for and attend call with LG Chem re search terms.	0.5	600	\$300.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/14/2015	Planning for next wave of discovery. Organizing management team and materials. Organizing and structuring database for next wave of review. Organizing and managing translations. Worked with DPPs to accomplish translation of transactional data for experts. Updating coding instructions and materials. Collection of evidence and facts for master charts.	4.1	550	\$2,255.00	L140	RSS
5/15/2015	LIB document translation.	7.5	350	\$2,625.00	L140	JC
5/15/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Translating Japanese section of SDI doc for coworker.	8	125	\$1,000.00	L140	AE
5/15/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/15/2015	Review and translate SDI documents for use at deposition.	8.5	125	\$1,062.50	L140	JWJ
5/15/2015	Check off the Master List documents in Routing coding form in the Catalyst; Put the list of documents on Transactional Data Log into the Transactional Data Collection in Catalyst; Incorporate Batteries-Toshiba MSJ Production Hot documents List by Tracy Lee into the Toshiba Summary Judgment Review.	7.9	150	\$1,185.00	L140	CL
5/18/2015	Segregation of overlapped pages (encryption error) of a LIB doc and translation.	8	350	\$2,800.00	L140	JC
5/18/2015	Processed defendants and third party document production by downloading, saving and logging the same; coordinated with co-counsel for transmittal of said production.	1.5	250	\$375.00	L140	JSD
5/18/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Helping coworker research place name in SDI hot doc; Working on Sony Japanese search terms.	8	125	\$1,000.00	L140	AE
5/18/2015	Translate transactional data - doc NECB00000030; Meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	HH
5/18/2015	LIB SDI Korean Document Translation; Group Meeting lead by Shana and Ronnie.	8	125	\$1,000.00	L140	JWJ
5/18/2015	Check off the Master List documents in Routing coding form in Catalyst; Put the list of documents on Transactional Data Log into the Transactional Data Collection in Catalyst; Saved S-DOJ full rough translation documents from Shinae in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
5/19/2015	Proofread of certified translation documents.	7.5	350	\$2,625.00	L140	JC
5/19/2015	Processed defendants and third party document production by downloading, saving and logging the same; coordinated with co-counsel for transmittal of	1.5	250	\$375.00	L140	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	said production.					
5/19/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Translating Japanese names for coworker; Working on Panasonic/Sanyo English search terms.	8	125	\$1,000.00	L140	AE
5/19/2015	Translate transactional data - doc NECB00000030.	5	350	\$1,750.00	L140	HH
5/19/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/19/2015	Check off the Master List documents in Routing coding form in Catalyst; Emailed Helpdesk to release a large zip file of Batteries translation documents that has been quarantined by system and saved in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
5/20/2015	Proofread of certified translation documents.	8	350	\$2,800.00	L140	JC
5/20/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Working on Sony Japanese search terms.	8	125	\$1,000.00	L140	AE
5/20/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/20/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/20/2015	Check off the Master List documents in Routing coding form in Catalyst; Saved S-DOJ and SONY-LIB revised translation documents from Akiko in the Batteries shared folder; Put the list of documents on Defendants' Production tab into the "May 15 Review Set" Collection in Catalyst.	8	150	\$1,200.00	L140	CL
5/21/2015	Proofread of certified translation documents.	8	350	\$2,800.00	L140	JC
5/21/2015	Processed defendants and third party document production by downloading, saving and logging the same; coordinated with co-counsel for transmittal of said production.	2	250	\$500.00	L140	JSD
5/21/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Working on Sony Japanese search terms.	8	125	\$1,000.00	L140	AE
5/21/2015	Prepare for meet and confer regarding plaintiffs and class cert issues and discovery.	1.5	700	\$1,050.00	L390	JDF
5/21/2015	Meet and confer regarding plaintiffs and class cert issues and discovery.	1	700	\$700.00	L390	JDF
5/21/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/21/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/21/2015	Check off the Master List documents in Routing coding form in Catalyst; Fill in emails and phone numbers on the Batteries – Next Wave Planning and Search Worksheet.	8	150	\$1,200.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/21/2015	Conference call with LG Chem on search terms.	0.2	600	\$120.00	L390	SES
5/22/2015	Proofread of certified translation documents.	8	350	\$2,800.00	L140	JC
5/22/2015	Processed defendants and third party document production by downloading, saving and logging the same; coordinated with co-counsel for transmittal of said production.	2	250	\$500.00	L140	JSD
5/22/2015	Working on Sony Japanese search terms; Contacting Catalyst support about a problem with Catalyst searches; Giving status update on Toshiba review project; updating and sending Toshiba hot doc chart.	7.5	125	\$937.50	L140	AE
5/22/2015	Review and analyze discovery responses.	2.5	700	\$1,750.00	L311	JDF
5/22/2015	Translate transactional data - doc NECB00000030.	7	350	\$2,450.00	L140	HH
5/22/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/22/2015	Added Amy memo and Tracy Lee memo to The Toshiba Summary Judgment Review chart; Fill in emails and phone numbers on the Batteries – Next Wave Planning and Search Worksheet; Search the Master List and create a separate Excel index for six defendants and sent to Ronnie.	8	150	\$1,200.00	L140	CL
5/22/2015	Voicemail for counsel for Eastman Kodak regarding third party subpoena.	0.1	600	\$60.00	L390	SES
5/25/2015	Review and analyze documents.	3.2	700	\$2,240.00	L140	JDF
5/26/2015	LIB Team Meeting; Proofread of certified translation documents; Translation of an LIB document.	3.3	350	\$1,155.00	L140	JC
5/26/2015	Followed up with process server service of third party subpoenas.	0.5	250	\$125.00	L311	JSD
5/26/2015	Reviewed invoices related to service of third party subpoenas.	1.5	250	\$375.00	L311	JSD
5/26/2015	Calendared due dates and cleaned up outdated date schedules.	0.5	250	\$125.00	L120	JSD
5/26/2015	Working on Sony Japanese search terms; Weekly Batteries meeting; Researching Japanese company for coworker.	8.7	125	\$1,087.50	L140	AE
5/26/2015	Meet and discuss data issues.	1.2	700	\$840.00	L140	JDF
5/26/2015	Translate transactional data - doc NECB00000030; Team meeting.	8	350	\$2,800.00	L140	HH
5/26/2015	LIB SDI Korean Document Editing & Review; Group Meeting lead by Shana and Ronnie.	8	125	\$1,000.00	L140	JWJ
5/26/2015	Created a separate Excel index for Paul Kwon and sent to Ronnie; Updated Amy memo and Tracy Lee memo to The Toshiba Summary Judgment Review chart; Meeting; Pulled out Toshiba Production hot documents from Amy and Tracy list and sent to Demetrius and Michael; Searching emails and phones in Catalyst and filling in the Batteries – Next Wave Planning and Search Worksheet.	8	150	\$1,200.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/26/2015	Process defendant and third-party productions; update case file and production logs.	4.5	250	\$1,125.00	L140	BRM
5/26/2015	Reviewer meeting re assignments and translation status.	0.5	600	\$300.00	L140	SES
5/26/2015	Review list of Toshiba model numbers for production to Toshiba. Draft emails to experts re same.	0.7	600	\$420.00	L390	SES
5/26/2015	Voicemail for H. Holderness of Greenberg Trauig re subpoena to Keysight Technologies.	0.1	600	\$60.00	L390	SES
5/26/2015	Telephone call with J. Harrod (Eastman Kodak) re response to third party subpoena.	0.2	600	\$120.00	L390	SES
5/26/2015	Telephone call with M. Brown (Sony) re subpoena to Zelle Hoffman and lack of production of Sony data.	0.2	600	\$120.00	L390	SES
5/26/2015	Discovery conference with SNA on transactional data and responses to plaintiffs' March 19, 2015 letter.	1.2	600	\$720.00	L390	SES
5/26/2015	Conference call with Sony and DPPs on search terms.	0.2	600	\$120.00	L390	SES
5/26/2015	Discovery conference with third party Celestica regarding subpoena for data.	0.3	600	\$180.00	L390	SES
5/27/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
5/27/2015	Prepared letter to co-counsel transmitting invoices in connection with service of third party subpoenas.	0.5	250	\$125.00	L311	JSD
5/27/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Proofreading and correcting Sony Japanese search terms.	8	125	\$1,000.00	L140	AE
5/27/2015	Review and analyze document production.	3.4	700	\$2,380.00	L140	JDF
5/27/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/27/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/27/2015	Emailed Helpdesk to release two large zip files of Batteries translation documents that has been quarantined by system; Saved SDI-B documents and SANYO from Shinae in the Batteries shared folder; Saved PANA translation documents from Amanda in the Batteries shared folder; Searching emails and phones in Catalyst and filling in the Batteries – Next Wave Planning and Search Worksheet.	8	150	\$1,200.00	L140	CL
5/27/2015	Process defendant and third-party productions; audit of third-party productions regarding production to defendants; update case file.	3.1	250	\$775.00	L140	BRM
5/27/2015	Planning for next phase of review. Revising coding materials. Organizing productions in Catalyst. Assessing productions.	2.1	550	\$1,155.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/28/2015	Translation of LIB documents.	5	350	\$1,750.00	L140	JC
5/28/2015	Prepared document production subpoenas to third parties; served the same to defense counsel and arrange for their service.	2.5	250	\$625.00	L311	JSD
5/28/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
5/28/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
5/28/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/28/2015	Updated emails and phones on the Batteries – Next Wave Planning and Search Worksheet; Created two charts from the Batteries – Next Wave Planning and Search Worksheet and sent to Ronnie; Meeting with Ronnie; Searching info from database and Filling in fields on the Master Chronology List; Moved TSB- LIB00001896-15593 documents out of Transactional Data Collection.	8	150	\$1,200.00	L140	CL
5/28/2015	Process document productions; update case file; assist attorneys with issue/document requests.	1.4	250	\$350.00	L140	BRM
5/28/2015	Conference call with LG Chem re search terms.	0.2	600	\$120.00	L390	SES
5/28/2015	Conference call with Panasonic re data questionnaire from plaintiffs and Panasonic's response.	0.8	600	\$480.00	L390	SES
5/28/2015	Telephone call with Minna Naranjo (Funai Corp.) re subpoena and extension of time.	0.1	600	\$60.00	L390	SES
5/28/2015	Telephone call with H. Holderness (Keysight Technologies) re scope of data request.	0.1	600	\$60.00	L390	SES
5/28/2015	Telephone call with J. Stokes (Motorola) re subpoena and scope of data request.	0.2	600	\$120.00	L390	SES
5/28/2015	Planning for next wave of discovery. Assessing productions and sets.	1.2	550	\$660.00	L140	RSS
5/28/2015	Read and review lithium ion battery defendants' request for production of documents and interrogatories to plaintiffs.	1.5	425	\$637.50	L312	AYS
5/29/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
5/29/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	5.5	125	\$687.50	L140	AE
5/29/2015	Review Toshiba motion.	0.8	700	\$560.00	L312	JDF
5/29/2015	Call with counsel re Toshiba motion.	0.3	700	\$210.00	L312	JDF
5/29/2015	Prepare for class cert. discussion.	0.2	700	\$140.00	L210	JDF
5/29/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/29/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
5/29/2015	Searching info from database and Filling in fields on the Master Chronology List; Emailed Helpdesk to release a large zip file of Batteries final PCT documents that has been quarantined by system; Saved final PCT documents from Richard in the Batteries shared folder; Updated final PCT documents on the Master Chronology List; Pulled out Hitachi production documents and sent to Demetrius and Michael; Adding Amy and Tracy Toshiba MSJ production hot documents on the Master Chronology List.	8	150	\$1,200.00	L140	CL
5/29/2015	Update case file; process document productions.	1.5	250	\$375.00	L140	BRM
5/29/2015	Call with M. Pilotin and DPPs re Toshiba search terms, in preparation for discovery conference with Toshiba.	0.2	600	\$120.00	L390	SES
5/29/2015	Call with co-leads on strategy, discovery, schedule for briefing class certification and other issues.	0.5	600	\$300.00	L120	SES
6/1/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
6/1/2015	Updated third party production/meet and confer chart.	0.3	250	\$75.00	L311	JSD
6/1/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/1/2015	Edit requests and analyze discovery issues.	1.2	700	\$840.00	L210	JDF
6/1/2015	Translate transactional data - doc NECB00000030.	5.9	350	\$2,065.00	L140	HH
6/1/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/1/2015	Adding Amy and Tracy Toshiba MSJ production hot documents on the Master Chronology List; Check off the Master List documents in Routing coding form in Catalyst; Filling in blank fields on the Master Chronology List; Added new hot documents from Shinae on the Master List; Saved NEC translation documents from Amanda to Batteries shared folder.	8.5	150	\$1,275.00	L140	CL
6/1/2015	Update case file; review Panasonic load files regarding custodian production documents.	1.2	250	\$300.00	L140	BRM
6/1/2015	Call with co-leads re Toshiba and pre-filing conference letter; assignments re response thereto.	0.5	600	\$300.00	L120	SES
6/1/2015	Discovery conference with Sony on search terms.	0.5	600	\$300.00	L390	SES
6/1/2015	Discovery conference with Apple and SDI on third party subpoena and production.	0.2	600	\$120.00	L390	SES
6/1/2015	Discovery conference with Toshiba on outstanding discovery and search terms.	0.5	600	\$300.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/1/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	1	550	\$550.00	L140	RSS
6/2/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
6/2/2015	Followed up service of summons, resolved issues, and updated third parties chart.	1	250	\$250.00	L311	JSD
6/2/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/2/2015	Translate transactional data - doc NECB00000030.	8.5	350	\$2,975.00	L140	HH
6/2/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/2/2015	Fill in blank fields on the Master Chronology List; Saved TSB-LIB translation documents from Amanda to Batteries shared folder; Saved P- DOJ, S-DOJ translation documents from Akiko to Batteries shared folder; Create Merits collections in Catalyst and put a set of documents in the right collections.	8.5	150	\$1,275.00	L140	CL
6/2/2015	Update case file; process document productions.	0.9	250	\$225.00	L140	BRM
6/2/2015	Calls and emails to the following third parties to check on status of production: Amazon, Best Buy, Wal-Mart, US Cellular, Staples, T-Mobile, SED International, Office Depot, Newegg, Fujitsu America, Eastman Kodak. Update chart regarding communications re same. Communicate with experts updating on third party productions. Send request for payment from MEI to LCHB.	3	600	\$1,800.00	L311	SES
6/2/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	8.7	550	\$4,785.00	L140	RSS
6/3/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
6/3/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/3/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L210	JDF
6/3/2015	Call with co-counsel re case update.	4	700	\$2,800.00	L120	JDF
6/3/2015	Translate transactional data - doc NECB00000030.	8.6	350	\$3,010.00	L140	HH
6/3/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/3/2015	Fill in blank fields on the Master Chronology List; Added Amy and Tracy hot documents in the Master Chronology List; Copy Amy and Tracy hot documents Date and Description into Date and Review Notes fields in Catalyst; Put a set of transactional data documents in Transactional Data Collections.	8.5	150	\$1,275.00	L140	CL
6/3/2015	Process document productions; update case file.	0.8	250	\$200.00	L140	BRM
6/3/2015	Draft response to Toshiba Confer with co-leads re same.	0.5	600	\$300.00	L312	SES
6/3/2015	Research regarding Toshiba's motion for summary judgment	1.3	600	\$780.00	L120	SES
6/3/2015	Call with co-leads on strategy, Toshiba motion for summary judgment, and discovery assignments.	0.3	600	\$180.00	L120	SES
6/3/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process. Communications with other co-leads re coding form and review staffing.	7.9	550	\$4,345.00	L140	RSS
6/4/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
6/4/2015	Updated third parties chart.	0.7	250	\$175.00	L311	JSD
6/4/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/4/2015	Translate transactional data - doc NECB00000030.	8.7	350	\$3,045.00	L140	HH
6/4/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/4/2015	Fill in blank fields on the Master Chronology List; Compressed LGC-MDL translation documents and sent to Demetrius; Updated full rough translation documents Status and Description in Catalyst.	8.5	150	\$1,275.00	L140	CL
6/4/2015	Update case file; process document production.	0.7	250	\$175.00	L140	BRM
6/4/2015	Prepare for and attend call with defendants regarding IPP discovery responses.	1	600	\$600.00	L390	SES
6/4/2015	Call with Sony regarding data.	0.5	600	\$300.00	L390	SES
6/4/2015	Prepare for and attend discovery conference with Sanyo, NEC and Toshiba regarding HBSS subpoena to LCHB for data and documents produced in the LCD litigation.	1	600	\$600.00	L390	SES
6/4/2015	Weekly management team call. Management of review and incoming productions. Draft training materials for review team. Collection of	8.2	550	\$4,510.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	evidence in master charts. Management of translation process.					
6/5/2015	Translation of LIB documents.	8	350	\$2,800.00	L140	JC
6/5/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/5/2015	Translate transactional data - doc NECB00000030.	8.3	350	\$2,905.00	L140	HH
6/5/2015	Updated full rough translation documents Status and Description in Catalyst.	6	150	\$900.00	L140	CL
6/5/2015	Process document productions; update case file.	0.9	250	\$225.00	L140	BRM
6/5/2015	Telephone calls with third parties T-Mobile, Wal-Mart and Brandsmart re third party subpoenas, objections and production of documents and data. Emails to experts and co-counsel re same summarizing and asking questions re productions.	1.5	600	\$900.00	L311	SES
6/5/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	8.7	550	\$4,785.00	L140	RSS
6/6/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	1.2	550	\$660.00	L140	RSS
6/7/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	2.2	550	\$1,210.00	L140	RSS
6/8/2015	Team meeting; Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/8/2015	Reviewed WOJ invoices re service of subpoenas.	1	250	\$250.00	L120	JSD
6/8/2015	Updated third party production chart.	1	250	\$250.00	L311	JSD
6/8/2015	Calendar due dates/cleaned up calendar.	0.5	250	\$125.00	L120	JSD
6/8/2015	Research possible locations for document production subpoenas; prepared third party doc. production <u>subpoenas</u> .	1.5	250	\$375.00	L311	JSD
6/8/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Team meeting.	4	125	\$500.00	L140	AE
6/8/2015	Translate transactional data - doc NECB00000030; team meeting with Shana and Ronnie.	8	350	\$2,800.00	L140	НН
6/8/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/8/2015	Checked each set of documents on the Assignment Master List with the documents in Collection – 2014 Review Set in Catalyst; Meeting with team and meeting with Ronnie; Updated full rough translation documents Status and Description in Catalyst; Added new set of PANA and SANYO documents to the right Collections in Catalyst; Added additional Names and Entities from Shinae chart into the Master cheat Sheet (Names and Entities).	8	150	\$1,200.00	L140	CL
6/8/2015	Update case file; updated third-party subpoena logs.	1.2	250	\$300.00	L140	BRM
6/8/2015	Call with review team re assignments and status of review.	2	600	\$1,200.00	L120	SES
6/8/2015	Weekly HBSS review team meeting. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	8.1	550	\$4,455.00	L140	RSS
6/9/2015	Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/9/2015	Prepared notice of subpoenas and third party document production subpoenas.	4	250	\$1,000.00	L311	JSD
6/9/2015	Updated service list.	0.8	250	\$200.00	L120	JSD
6/9/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/9/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/9/2015	Emailed Helpdesk to release two large zip files of Batteries translation documents that has been quarantined by system; Saved HML-P full rough translation documents by IPPs from Shinae in the Batteries shared folder; Saved NEC full rough translation documents from Amanda to the Batteries shared folder; Meeting with Ronnie; Searched and marked Toshiba MSJ documents in the Master Chronology List; Added Shinichi's new Toshiba MSJ hot documents to the Toshiba Summary Judgment Review and the Master Chronology List; Created collection names and assigned users in each collection; Cleaning up the colors in the rows on the Master Chronology List.	8	150	\$1,200.00	L140	CL
6/9/2015	Update case file.	0.7	250	\$175.00	L140	BRM
6/9/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	6.2	550	\$3,410.00	L140	RSS
6/10/2015	Proofreading of LIB documents; Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/10/2015	Update case file, consider status and write notes to file.	2	250	\$500.00	L120	JSD
6/10/2015	Prepared notice of subpoenas, third party document production subpoenas,	4	250	\$1,000.00	L311	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	served the same to defense counsel, and facilitated their service to third parties.					
6/10/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/10/2015	Call with co-counsel.	1	700	\$700.00	L120	JDF
6/10/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
6/10/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/10/2015	Added additional Names and Entities from Shinae chart into the Master cheat Sheet (Names and Entities); Moved NECT documents that have not been reviewed out of Collection – 2014 Review Set.	8	150	\$1,200.00	L140	CL
6/10/2015	Update case file; review status of third-party subpoena responses.	1.1	250	\$275.00	L140	BRM
6/10/2015	Call with co-lead counsel re status of litigation, assignments, and expert analysis.	0.5	600	\$300.00	L120	SES
6/10/2015	Call with P. Veith re subpoena to US Cellular. Write summary of conversation to file.	0.2	600	\$120.00	L390	SES
6/10/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	6.9	550	\$3,795.00	L140	RSS
6/11/2015	Translation of LIB document.	7.5	350	\$2,625.00	L140	JC
6/11/2015	Reviewed third parties who have not responded to the subpoenas and drafted letters to follow up.	2.5	250	\$625.00	L311	JSD
6/11/2015	Researched entities whose subpoenas cannot be served due to incorrect/stale address.	2	250	\$500.00	L311	JSD
6/11/2015	Coding Toshiba (custodian documents and recording any hot documents in chart.	8	125	\$1,000.00	L140	AE
6/11/2015	Call with co-counsel re government entities review issues related thereto.	1	700	\$700.00	L120	JDF
6/11/2015	Translate transactional data - doc NECB00000030.	8	350	\$2,800.00	L140	HH
6/11/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/11/2015	Added additional Names and Entities from Shinae chart into the Master cheat Sheet (Names and Entities); Find users assigned to a role in Collections in Catalyst; Added new NEC documents into the right Merits Collections.	8	150	\$1,200.00	L140	CL
6/11/2015	Update case file; process document productions; assist experts with data file issues; assist with preparation of additional third-party subpoenas.	4	250	\$1,000.00	L140	BRM
6/11/2015	Call with Sony regarding transactional data for the purposes of mediation.	0.5	600	\$300.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/11/2015	Email and telephone calls with the following non-parties regarding subpoenas and document productions: Adorama, Asus, Cornwell, Arrow Electronics, CompUSA, Kodak, Verizon.	1	600	\$600.00	L390	SES
6/11/2015	Weekly review team manager call. Planning for start up of next wave of review. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	9.1	550	\$5,005.00	L140	RSS
6/12/2015	Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/12/2015	Coding Toshiba (custodian documents and recording any hot documents in chart; Working on targeted Toshiba searches	8	125	\$1,000.00	L140	AE
6/12/2015	Translate transactional data - doc NECB00000030.	7	350	\$2,450.00	L140	HH
6/12/2015	Review and translate SDI documents for use at deposition.	8	125	\$1,000.00	L140	JWJ
6/12/2015	Pulled out SONY-LIB documents from Catalyst and sent to Ronnie; Added additional Names and Entities from Shinae chart into the Master cheat Sheet (Names and Entities); Saved TSB-LIB full rough translation documents from Ronnie to the Batteries shared folder; Added TSB-LIB documents on the Master Chronology List; Saved NEC full rough translation documents from Amanda to the Batteries shared folder; Added Amy and Tracy's new Toshiba MSJ hot documents on the Master Chronology List; Filtered the Toshiba MSJ documents on the Master Chronology List. Copying filtered data to a new spreadsheet and sent to Ronnie; Added Amy and Tracy's new Toshiba MSJ hot documents on the Toshiba Summary Judgment Review.	8	150	\$1,200.00	L140	CL
6/12/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	9.2	550	\$5,060.00	L140	RSS
6/15/2015	LIB team meeting; Translation of LIB documents; Proofread of LIB certified translations.	8	350	\$2,800.00	L140	JC
6/15/2015	Reviewed invoices re service of subpoenas.	2	250	\$500.00	L120	JSD
6/15/2015	Negotiated rates for service of subpoenas with a new vendor.	1	250	\$250.00	L311	JSD
6/15/2015	Weekly team meeting; Working on Toshiba targeted searches	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/15/2015	Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Meeting with Ronnie; Create column for Eguchi, Kubo, and Fujitomo on the Master List. Tag and run documents to a new chart for each defendant.	9	150	\$1,350.00	L140	CL
6/15/2015	Update case file; process document productions.	0.8	250	\$200.00	L140	BRM
6/15/2015	Planning for next wave of review kickoff training session. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	10.2	550	\$5,610.00	L140	RSS
6/16/2015	Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/16/2015	Prepared amended notice of subpoenas and third party document subpoenas.	4	250	\$1,000.00	L311	JSD
6/16/2015	Prepared letter to co-counsel re expenses on service of subpoenas; update spreadsheet of expenses.	1	250	\$250.00	L311	JSD
6/16/2015	Working on Toshiba targeted searches	8	125	\$1,000.00	L140	AE
6/16/2015	Searching and tagging more documents for Eguchi, Kubo, and Fujitomo on the Master List; Re-run documents to a new chart for each defendant and sent to Ronnie; Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst.	8.6	150	\$1,290.00	L140	CL
6/16/2015	Process document productions; update case file.	0.8	250	\$200.00	L140	BRM
6/16/2015	Planning for next wave of review kickoff training session. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	11.1	550	\$6,105.00	L140	RSS
6/17/2015	Catalyst training; Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/17/2015	Catalvst LIB coding training session; Working on Toshiba targeted searches re	8	125	\$1,000.00	L140	AE
6/17/2015	Catalyst training.	1.7	350	\$595.00	L140	HH
6/17/2015	Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Catalyst training; Saved NECB full rough translation documents from Shinae to the Batteries shared folder; Saved revised translation documents from Akilo to the Batteries shared folder; Updated new translation data documents status in Catalyst.	8.3	150	\$1,245.00	L140	CL
6/17/2015	Process document production; update case file; update case calendar.	1.4	250	\$350.00	L140	BRM
6/17/2015	Catalyst training.	1.9	325	\$617.50	L140	PAR

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/17/2015	Planning for next wave of review kickoff training session. Led meeting and training session for new reviewers. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	8.2	550	\$4,510.00	L140	RSS
6/18/2015	Translation of LIB document.	8	350	\$2,800.00	L140	JC
6/18/2015	Working on Toshiba targeted searches re	8	125	\$1,000.00	L140	AE
6/18/2015	Added new NEC and NECT documents into the right Collections; Meeting with Ronnie; Updated new translation data documents status in Catalyst.	4.4	150	\$660.00	L140	CL
6/18/2015	Process document productions; audit of third-party productions distributed to experts; update case file.	0.9	250	\$225.00	L140	BRM
6/18/2015	Calls and emails with the following third parties regarding productions of data for the purposes of class certification: AOpen, Lowes, Insight, Imation, Verizon, Office Depot, Canon USA, IBM, Brandsmart, Ace, Asus, Avnet, CDW, Fry's, Ingram, MEI and PC Connection. Email to experts summarizing discussions.	7	600	\$4,200.00	L390	SES
6/18/2015	Weekly review management call. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	10.5	550	\$5,775.00	L140	RSS
6/19/2015	Summary and translation of LIB document.	8	350	\$2,800.00	L140	JC
6/19/2015	Working on Toshiba targeted searches re Coding Japanese documents marked Hot by Ronnie.	8	125	\$1,000.00	L140	AE
6/19/2015	Attn. fact and document review procedures.	2.5	700	\$1,750.00	L140	JDF
6/19/2015	Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Updated new translation data documents status in Catalyst; Saved LGC-MDL translation documents from Shinae to the Batteries shared folder; Downloaded final translation documents from Consortra site and saved in the Batteries shared folder.	9	150	\$1,350.00	L140	CL
6/19/2015	Process document productions; update production logs; review status of third-party subpoenas; update case file.	1.4	250	\$350.00	L140	BRM
6/19/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	8	550	\$4,400.00	L140	RSS
6/20/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	1.5	550	\$825.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/21/2015	Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	2.3	550	\$1,265.00	L140	RSS
6/22/2015	LIB team meeting; Proofread of LIB documents.	8	350	\$2,800.00	L140	JC
6/22/2015	Weekly Battery meeting; Toshiba coding review and LIB Catalyst search meeting; Coding and sending rssrequestcode documents; Working on Toshiba targeted searches re Battery Association of Japan.	7.5	125	\$937.50	L140	AE
6/22/2015	Review and research expert work.	1.5	700	\$1,050.00	L130	JDF
6/22/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
6/22/2015	Added Amy's hot documents on the Master Chronology List; Meeting with team; Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Saved LGC-MDL full rough translation documents from Shinae to the Batteries shared folder.	8	150	\$1,200.00	L140	CL
6/22/2015	Process document productions; produce third-party productions to defendants; update case file; update third-party subpoena chart.	1.6	250	\$400.00	L140	BRM
6/22/2015	Calls and emails with the following third parties regarding productions of data for the purposes of class certification: Verizon, IBM, Office Depot, Staples, Aopen, Dell, Lenovo, Lowes. Email to experts re same.	3.2	600	\$1,920.00	L390	SES
6/22/2015	Meeting with review team regarding assignments and update on review.	0.5	600	\$300.00	L120	SES
6/22/2015	Weekly HBSS reviewer meeting. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process. Planning and overseeing process for preparation of upcoming deposition (and deposition packets).	9.1	550	\$5,005.00	L140	RSS
6/23/2015	LIB reviewer call and LIB search discussion; Proofread of LIB document.	8	350	\$2,800.00	L140	JC
6/23/2015	Working on Toshiba targeted searches re Weekly LIB reviewer's meeting; LIB targeted search strategy meeting; Coding Toshiba Daiichiro Eguchi documents and recording any hot documents.	8	125	\$1,000.00	L140	AE
6/23/2015	Prepare and call re expert work.	1.2	700	\$840.00	L130	JDF
6/23/2015	Batteries review meeting.	0.5	350	\$175.00	L140	HH
6/23/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/23/2015	Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Put MAX-P documents into the right Collections; Updated CTs and full rough translations status in Catalyst; Run SH Kwak, Eguchi, Kubo, and Fujitomo documents from Master Chronology List to a new chart for each defendant and sent to Ronnie.	8	150	\$1,200.00	L140	CL
6/23/2015	Review third-party subpoena invoices; update case file; process document production; review production logs regarding product manuals for experts; update third-party subpoena status chart.	2.1	250	\$525.00	L140	BRM
6/23/2015	Calls and emails with the following third parties regarding productions of data for the purposes of class certification: Dell, Fry's, Benchmark Electronics. Email to experts re same.	1.8	600	\$1,080.00	L390	SES
6/23/2015	Weekly review team call. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	9	550	\$4,950.00	L140	RSS
6/24/2015	Proofread LIB translations; Review LIB documents.	8	350	\$2,800.00	L140	JC
6/24/2015	Call with LG Chem regarding search terms.	0.3	250	\$75.00	L390	JSD
6/24/2015	Coding and sending Japanese rssrequestcode documents; Coding Toshiba Daiichiro Eguchi documents and recording any hot documents.	8	125	\$1,000.00	L140	AE
6/24/2015	Prepare and hold call re expert work.	2	700	\$1,400.00	L130	JDF
6/24/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
6/24/2015	Edited SH Kwak, Eguchi, Kubo, and Fujitomo charts and sent to Ronnie; Assigned Greg Stuart user roles for a senior reviewer status in Catalyst; Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Meeting with Ronnie; Updated new CTs and translation data documents status in Catalyst; Added Amy's hot documents on the Master Chronology List; Put LGC-MDL documents into the right Collections.	8	150	\$1,200.00	L140	CL
6/24/2015	Update case file; process document productions; review status of third-party subpoenas.	1	250	\$250.00	L140	BRM
6/24/2015	Call with co-leads regarding case status, discovery and assignments for class certification.	0.5	600	\$300.00	L120	SES
6/24/2015		0.1	600	\$60.00	L160	SES
6/24/2015	Calls and emails with third parties regarding subpoena for data, including Acer, ABC Warehouse, Avnet and Newegg.	0.2	600	\$120.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/24/2015	Call with Lenovo regarding third party subpoena. Follow up email re same.	0.2	600	\$120.00	L390	SES
6/24/2015	Deposition preparation training and planning. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	9.1	550	\$5,005.00	L330	RSS
6/25/2015	Review of LIB documents.	8	350	\$2,800.00	L140	JC
6/25/2015	Coding Toshiba Daiichiro Eguchi documents and recording any hot documents.	8.5	125	\$1,062.50	L140	AE
6/25/2015	Review discovery materials.	1.8	700	\$1,260.00	L210	JDF
6/25/2015	Added Sawa's Kubo hot documents onto the Master Chronology List; Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Put new LGC-MDL documents into the right Collections; Meeting with Ronnie; Finding and coding IIT (Institute of Information Technology) reports in Catalyst.	8	150	\$1,200.00	L140	CL
6/25/2015	Process document production; update case file.	0.5	250	\$125.00	L140	BRM
6/25/2015		0.1	600	\$60.00	L160	SES
6/25/2015	Weekly review manager team call. Deposition preparation training and planning. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	7.6	550	\$4,180.00	L330	RSS
6/26/2015	Review of LIB documents; catalyst training.	8	350	\$2,800.00	L140	JC
6/26/2015	Coding Toshiba Daiichiro Eguchi documents and recording any hot documents; Catalyst advanced search training session; Coding and sending Japanese rssrequestcode documents.	8	125	\$1,000.00	L140	AE
6/26/2015	Review discovery materials.	1.4	700	\$980.00	L210	JDF
6/26/2015	Catalyst advanced search training.	1.6	350	\$560.00	L140	HH
6/26/2015	LIB LGC Document Review; LIB catalyst meeting.	8	125	\$1,000.00	L140	JWJ
6/26/2015	Saved reviewer memos in the Batteries shared folder; Catalyst training; Finding and coding IIT (Institute of Information Technology) reports in Catalyst.	8	150	\$1,200.00	L140	CL
6/26/2015	Process document productions; update case calendar regarding third-party subpoenas issued by defendants; update document production log; update case file.	0.9	250	\$225.00	L140	BRM
6/26/2015	Advanced case document database search training session for Catalyst	1.7	325	\$552.50	L140	PAR

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	review program.					
6/26/2015		3.5	600	\$2,100.00	L160	SES
6/26/2015	Call with Sony re transactional data	0.7	600	\$420.00	L390	SES
6/26/2015	Deposition preparation training and planning. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process.	10.2	550	\$5,610.00	L330	RSS
6/27/2015	Review team management and organization.	1.2	550	\$660.00	L140	RSS
6/28/2015	Review team management and organization.	2.2	550	\$1,210.00	L140	RSS
6/29/2015	Team meeting; Review LIB documents.	8	350	\$2,800.00	L140	JC
6/29/2015	Batteries team meeting; Coding and sending Japanese rssrequestcode documents; Coding Toshiba Daiichiro Eguchi documents and recording any hot documents.	8	125	\$1,000.00	L140	AE
6/29/2015	Review and then call re case map; call with experts.	3.5	700	\$2,450.00	L140	JDF
6/29/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
6/29/2015	Sent PCT translation documents of LGC-MDL and SDI to Shana; Meeting with team, meeting with Ronnie; Finding and Marking documents on the Master List for Kidani, Kondo, Matsumoto, Niko, and Tachihara. Run the list of documents to a new chart for each defendant and sent to Ronnie; Saved LGC-MDL full rough translation documents from Shinae to the Batteries shared folder.	8	150	\$1,200.00	L140	CL
6/29/2015	Process document productions; update case file; assist experts with document requests.	1.2	250	\$300.00	L140	BRM
6/29/2015	Call with expert regarding class certification declaration, deadlines and proposed outline.	1	600	\$600.00	L260	SES
6/29/2015	Review documents to incorporate into Sony mediation statement. Draft Sony mediation statement.	7.1	600	\$4,260.00	L160	SES
6/29/2015	Call with Susan of Wolkind Law regarding ABC Warehouse's response to subpoena.	0.2	600	\$120.00	L312	SES
6/29/2015	Call with J. Mason of Office Depot regarding response to subpoena.	0.2	600	\$120.00	L312	SES
6/29/2015	Deposition preparation training and planning. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process. Weekly HBSS review team meeting. Call with co-leads re process for deposition preparation and transfer over to using casemap system. Call with Brendan	9.1	550	\$5,005.00	L330	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Glackin and review team re upcoming deponent selection.					
6/30/2015	Coding Toshiba Daiichiro Eguchi documents and recording any hot documents; Battery reviewers meeting; Reviewing Toshiba LIB documents and recording any hot documents.	8	125	\$1,000.00	L140	AE
6/30/2015	Saved Memo in the Batteries shared folder; Emailed Helpdesk to release two large zip files of Batteries translation documents that has been quarantined by system; Saved NEC and TSB full rough translation documents from Shinae to Batteries shared folder; Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Comparing, adding and tagging documents and Dupes across Master List and Catalyst.	8	150	\$1,200.00	L140	CL
6/30/2015	Process document productions; assist with document review questions from experts; update case file.	1.2	250	\$300.00	L140	BRM
6/30/2015	Prepare for and conduct call with Sony re search terms and data.	0.5	600	\$300.00	L390	SES
6/30/2015	Prepare for and conduct call with Home Depot's counsel re non-party subpoena for production of data and information.	0.5	600	\$300.00	L390	SES
6/30/2015	Call with Dell re MDL proceedings and non-party subpoena for production of data.	0.5	600	\$300.00	L390	SES
6/30/2015	Call with HP re contact information for class members.	0.2	600	\$120.00	L390	SES
6/30/2015	Deposition preparation training and planning. Management of review and incoming productions. Draft training materials for review team. Collection of evidence in master charts. Management of translation process. Weekly review team call.	9.1	550	\$5,005.00	L330	RSS
7/1/2015	Review LIB documents; Translate LIB documents.	8	350	\$2,800.00	L140	JC
7/1/2015	Reviewing Toshiba LIB documents and recording any hot documents.	8	125	\$1,000.00	L140	AE
7/1/2015	Filled in blank fields on the Master Chronology List and checked off "On Master List" field in Catalyst; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Put NEC, SDI, and TSB-LIB documents into the right Collections; Downloaded CTs and full rough translation documents from Richard's Dropbox to Batteries shared folder.	8	150	\$1,200.00	L140	CL
7/1/2015	Process document productions; update case file.	1	250	\$250.00	L140	BRM
7/1/2015	Edit Sony mediation statement and circulate to co-lead counsel.	0.8	600	\$480.00	L160	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/1/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.1	550	\$3,905.00	L140	RSS
7/2/2015	Work on mediation statement.	1	900	\$900.00	L210	SWB
7/2/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/2/2015	Updated third party chart.	0.5	250	\$125.00	L390	JSD
7/2/2015	Researched docket for Microsoft and Dell complaint re lithium batteries complaints.	1.5	250	\$375.00	L110	JSD
7/2/2015	Reviewing Toshiba LIB documents and recording any hot documents.	8	125	\$1,000.00	L140	AE
7/2/2015	Call with experts.	1.3	700	\$910.00	L130	JDF
7/2/2015	Renamed all LGC-MDL translation documents to CT in Batteries Shared folder; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Downloaded transactional data documents from Richard's Dropbox to Batteries shared folder; Moved all transactional data rows to the second Tab of the Batteries Assignment Master List worksheet.	8	150	\$1,200.00	L140	CL
7/2/2015	Process defendant and third party productions; update production charts; update case file.	2.5	250	\$625.00	L140	BRM
7/2/2015	Call with CompuCom re objections to third party subpoena.	0.2	600	\$120.00	L390	SES
7/2/2015	Call with expert re preparation for class certification motion.	0.5	600	\$300.00	L130	SES
7/2/2015	Call with Toshiba and DPPs re search terms for	0.7	600	\$420.00	L390	SES
7/2/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	9	550	\$4,950.00	L140	RSS
7/2/2015	Communicate with and log information regarding class representatives.	3.3	425	\$1,402.50	L120	AYS
7/3/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	4.2	550	\$2,310.00	L140	RSS
7/6/2015	Prepare for mediation.	1	900	\$900.00	L160	SWB

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/6/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/6/2015		1	250	\$250.00	L160	JSD
7/6/2015	Attn. discovery; technical expert	2.2	700	\$1,540.00	L130	JDF
7/6/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/6/2015	Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Saved Memo in the Batteries shared folder; Downloaded more CTs documents and saved in "Translations (All Merits)" in the Batteries shared folder; Downloaded more transactional data documents from and saved in "Translation (Transactional Data)" in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
7/6/2015	Send email to co-counsel re expert reports.	0.2	600	\$120.00	L130	SES
7/6/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	3.6	550	\$1,980.00	L140	RSS
7/7/2015	Office conference re mediation; Prepare for mediation.	3	900	\$2,700.00	L160	SWB
7/7/2015	LIB meeting for Catalyst training; Translation of LIB doc.	8	350	\$2,800.00	L140	JC
7/7/2015	Updated third party chart.	0.3	250	\$75.00	L390	JSD
7/7/2015	Attn discovery; document production; mediation prep.	4.2	700	\$2,940.00	L390	JDF
7/7/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/7/2015	Put new production documents into the right Collections in Catalyst; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Sent a PCT doc of SDI-B to Shana; Saved PCT of LGC-MDL documents in the Batteries shared folder; Updated new PCT documents status on the Master Chronology List and in Catalyst; Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Renamed PCT documents in "Translations (All Merits)" in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
7/7/2015	Process document productions; update case file.	1.4	250	\$350.00	L140	BRM
7/7/2015	Prepare for and conduct discovery conference with HML on search terms.	0.5	600	\$300.00	L390	SES
7/7/2015		0.6	600	\$360.00	L160	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/7/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding. Led weekly review team call.	6.5	550	\$3,575.00	L140	RSS
7/8/2015		8	900	\$7,200.00	L160	SWB
7/8/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/8/2015		9	700	\$6,300.00	L160	JDF
7/8/2015	Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Put new production documents of NECT and HML-P into the right Collections in Catalyst.	8	150	\$1,200.00	L140	CL
7/8/2015	Call with Lenovo regarding third party subpoena.	0.2	600	\$120.00	L390	SES
7/8/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	8.1	550	\$4,455.00	L140	RSS
7/9/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/9/2015	Followed up service of subpoenas; resolved issues; updated third party chart.	1.2	250	\$300.00	L390	JSD
7/9/2015		2.2	700	\$1,540.00	L160	JDF
7/9/2015	Review and translate LGC documents for use at depositions.	4	125	\$500.00	L140	JWJ
7/9/2015	Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Fixed Rows colors on the Master Chronology List; Updated all PCT documents status on the Master Chronology List; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Meeting with Ronnie; Saved NEC Transactional Data documents from Amanda to the Batteries shared folder.	8	150	\$1,200.00	L140	CL
7/9/2015	Process document productions; update case file.	0.9	250	\$225.00	L140	BRM
7/9/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.5	550	\$4,125.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/9/2015	Communicate with and log information regarding class representatives.	0.8	425	\$340.00	L120	AYS
7/10/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/10/2015	Call re mediation.	1	700	\$700.00	L120	JDF
7/10/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/10/2015	Take out the Exhibit List from the Master List to a new chart and sent to Ronnie; Create new Exhibits folder and sub-folders in the Batteries shared folder; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Added new exhibit documents of Declaration ISO MSJ on the Master List; Break Declaration ISO MSJ in separate PDFs for each attachment [Exhibits]. Sent PDF documents of Declaration ISO MSJ PDF to Richard and also Saved in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
7/10/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.1	550	\$3,905.00	L140	RSS
7/11/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	1.5	550	\$825.00	L140	RSS
7/12/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	1.7	550	\$935.00	L140	RSS
7/13/2015	LIB Meeting; Translation of LIB documents.	8	350	\$2,800.00	L140	JC
7/13/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/13/2015	Saved LIB Batch Memos in the Batteries shared folder; Filled in blank fields on the Master Chronology List and checked off Routing " field in Catalyst; Meeting: Put the exhibit notation for exhibit documents in Catalyst and also put in the codes field.	7	150	\$1,050.00	L140	CL
7/13/2015	Process document production; update case file.	0.8	250	\$200.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/13/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	8.1	550	\$4,455.00	L140	RSS
7/14/2015	Weekly document review call; Translation of LIB documents.	8	350	\$2,800.00	L140	JC
7/14/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/14/2015	Filled in blank fields on the Master Chronology List and checked off Routing field in Catalyst; Put the exhibit notation for exhibit documents in Catalyst and also put field in the codes field; Put new production documents of NEC, PNA, PANA, and SNA into the right Collections in Catalyst; Comparing, adding and tagging documents and Dupes across Master List and Catalyst.	8.5	150	\$1,275.00	L140	CL
7/14/2015	Update case file; review of recent document productions for loading; review status of third-party subpoena responses and productions.	1.8	250	\$450.00	L140	BRM
7/14/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	9.1	550	\$5,005.00	L140	RSS
7/15/2015	Counsel call; research experts.	1.3	700	\$910.00	L130	JDF
7/15/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/15/2015	Filled in blank fields on the Master Chronology List and checked off Routing field in Catalyst; Added the Declaration of Frank Hogue ISO Tosh MSJ exhibits on the Master Exhibit Tracking List; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Create Depo Set Lists and Depo Background Memos folder in the Batteries shared folder. Saved Depo Background Memos in shared folder.	8.5	150	\$1,275.00	L140	CL
7/15/2015	Update case file; review defendant production correspondence for encryption keys.	0.4	250	\$100.00	L140	BRM
7/15/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	6.5	550	\$3,575.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/16/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/16/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/16/2015	Added the Declaration of Frank Hogue ISO Tosh MSJ exhibits on the Master Chronology List; Saved the Batteries Batch Memos to the Batteries shared folder; Comparing, adding and tagging documents and Dupes across Master List and Catalyst; Filled in blank fields on the Master Chronology List and checked off Routing field in Catalyst; Put new production documents of NEC, PANA, SANYO, and SONY into the right Collections in Catalyst; Added certified translation date on the exhibit documents on the Master Chronology List.	8	150	\$1,200.00	L140	CL
7/16/2015	Process document productions; update case file and production logs.	2.8	250	\$700.00	L140	BRM
7/16/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	10.1	550	\$5,555.00	L140	RSS
7/17/2015	Review and translate LIB documents.	8	350	\$2,800.00	L140	JC
7/17/2015	Prep and call with technical expert.	2.5	700	\$1,750.00	L130	JDF
7/17/2015	Review and translate LGC documents for use at depositions.	8	125	\$1,000.00	L140	JWJ
7/17/2015	Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Added new exhibit documents of Declaration ISO MSJ on the Master List; Put new production documents of NEC into the right Collections in Catalyst; Added LGC translation documents on the Master List and saved in the Batteries shared folder; Saved SH Kwak and D Eguchi memo in the Depo Set shared folder; Added Amy and Tracy's TEL-Batteries Toshiba Meeting Search hot documents on the Master List and checked off Routing "On Master List" field in Catalyst.	8	150	\$1,200.00	L140	CL
7/17/2015	Create co-counsel working set of discovery responses; review document productions regarding potential corrupted files.	1.1	250	\$275.00	L312	BRM
7/17/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	8.2	550	\$4,510.00	L140	RSS
7/18/2015	Respond to reviewer emails and questions.	1.7	550	\$935.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/19/2015	Respond to reviewer emails and questions. Update assignments chart.	0.4	550	\$220.00	L140	RSS
7/20/2015	LIB team meeting; Translation of LIB documents.	7.7	350	\$2,695.00	L140	JC
7/20/2015	Attn discovery matters; depo issues.	2.5	700	\$1,750.00	L390	JDF
7/20/2015	LIB LGC Document Review; LIB Meeting.	8	125	\$1,000.00	L140	JWJ
7/20/2015	Added Amy's Batteries Toshiba Meeting Search hot documents on the Master List; Meeting with team, meeting with Ronnie; Saved Batteries full rough translation documents from Shinae to the Batteries shared folder; Break out Frank Hogue Declaration ISO MSJ in separate PDFs for each attachment [Exhibits]. Saved in the Batteries shared folder.	8	150	\$1,200.00	L140	CL
7/20/2015	Update case file; process document productions; review of original Sony production regarding missing and corrupted files for reproduction.	1.5	250	\$375.00	L140	BRM
7/20/2015	Respond to emails and voicemails from third parties regarding subpoenas for production of documents and data, including Office Depot, Nebraska Furniture Mart, ABC Warehouse, ABT data.	1.3	600	\$780.00	L390	SES
7/20/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	9.1	550	\$5,005.00	L140	RSS
7/20/2015	Communicate with and log information regarding class representatives.	1.2	425	\$510.00	L120	AYS
7/21/2015	LIB meeting; Review of batch of documents in Catalyst assigned by supervising attorney; Review of DPP translations.	9	350	\$3,150.00	L140	JC
7/21/2015	Prepared letters to Sprint, Bosch and Arrow Electronics to follow-up document production subpoena.	2	250	\$500.00	L390	JSD
7/21/2015	Prepared notice of subpoena and subpoena for production of documents to Microsoft and served the same.	1.5	250	\$375.00	L390	JSD
7/21/2015	Formatted and proofed rights and responsibilities and client questionnaire for prospective class rep.	2	250	\$500.00	L390	JSD
7/21/2015	Attn documents discovery issues.	2.2	700	\$1,540.00	L390	JDF
7/21/2015	LIB LGC/SDI Document Review; Reviewer's Meeting LIB.	7.5	125	\$937.50	L140	JWJ
7/21/2015	Marked documents on the Class Certification Review Chart as "jandersonccdocuments" in Catalyst; Put new production documents of NECT, PANA, PNA and SNA into the right Collections in Catalyst; Added Amy and Tracy's Tosh MSJ hot documents on the Toshiba Summary	8	150	\$1,200.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Judgment Review chart; Compressed Kubo memos to a zip file and sent to Hisun.					
7/21/2015	Process document production; update case file; review production regarding missing and corrupted files.	1.2	250	\$300.00	L140	BRM
7/21/2015	Follow up with third parties regarding subpoenas and data, including Dell, Best Buy, Brandsmart, Amazon, CompuCom, Home Depot, Apple, Lenovo, US Cellular, Verizon, AT&T, Black and Decker, Adorama.	3.5	600	\$2,100.00	L390	SES
7/21/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.8	550	\$4,290.00	L140	RSS
7/21/2015	Communicate with and log information regarding class representatives.	0.8	425	\$340.00	L120	AYS
7/22/2015	Proofed letters to Sprint, Bosch and Arrow Electronics to follow-up document production subpoena and served the same.	2	250	\$500.00	L390	JSD
7/22/2015	Call re case analysis.	1	700	\$700.00	L120	JDF
7/22/2015	Review and translate documents from Korean defendants LGC and SDI.	7.5	125	\$937.50	L140	JWJ
7/22/2015	Added new documents that coded in Catalyst on the Master List and checked off Routing "On Master List" field in Catalyst; Marked documents on the Class Certification Review Chart as "jandersonccdocuments" in Catalyst; Added Amy and Tracy's Tosh MSJ hot documents on the Toshiba Summary Judgment Review chart.	8	150	\$1,200.00	L140	CL
7/22/2015	Update case file and production logs; update deposition calendar.	1.2	250	\$300.00	L140	BRM
7/22/2015	Call with co-leads re settlement, notice, preparation for class certification motion and assignments for depositions.	0.5	600	\$300.00	L120	SES
7/22/2015	Phone call with Canon's counsel re third party production.	0.1	600	\$60.00	L390	SES
7/22/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.9	550	\$4,345.00	L140	RSS
7/22/2015	Communicate with and log information regarding class representatives.	1.7	425	\$722.50	L120	AYS
7/23/2015	Review of DPP translations.	3	350	\$1,050.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/23/2015	Reviewing and coding Japanese rssrequestcode documents; Meeting with Ronnie about deponent searches.	7	125	\$875.00	L140	AE
7/23/2015	Edit requests and analyze discovery issues.	1.1	700	\$770.00	L390	JDF
7/23/2015	Marked documents on the Class Certification Review Chart as "jandersonccdocuments" in Catalyst; Compressed the exhibit documents of Declaration of H Kubo ISO Tosh MSJ and sent to Demetrius; Put new production documents of HML-P, TSB-LIB, PANA, and PNA into the right Collections in Catalyst; Searched and marked documents on the Master List for Minoru Kondo, Fumitsugu Tachihara, YW Chung, and DW Lee; Sorted the list of documents for each defendant to a new chart and sent to Ronnie.	8	150	\$1,200.00	L140	CL
7/23/2015	Process document productions; update case file; review Time Matters database.	2	250	\$500.00	L140	BRM
7/23/2015	Prepare for and attend call with HML defendants regarding search terms.	0.7	600	\$420.00	L390	SES
7/23/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	10.1	550	\$5,555.00	L140	RSS
7/24/2015	Downloaded SDI production, logged and saved the same; coordinated with co-counsel re loading of the documents.	1.5	250	\$375.00	L140	JSD
7/24/2015	Reviewed invoices and prepared spreadsheet of unpaid invoices; prepared transmittal letter to co-counsel.	1.5	250	\$375.00	L120	JSD
7/24/2015	Reviewing, coding, and sending Japanese rssrequestcode documents; Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE
7/24/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
7/24/2015	Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Marked documents on the Class Certification Review Chart as "jandersonccdocuments" in Catalyst; Finding and coding IIT (Institute of Information Technology) reports in Catalyst.	8	150	\$1,200.00	L140	CL
7/24/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.2	550	\$3,960.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/25/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	1.4	550	\$770.00	L140	RSS
7/26/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	1	550	\$550.00	L140	RSS
7/27/2015	Updated third party chart.	0.5	250	\$125.00	L390	JSD
7/27/2015	Weekly Batteries meeting; Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE
7/27/2015	LIB LGC document review; team meeting.	8	125	\$1,000.00	L140	JWJ
7/27/2015	Saved batch memo and background memo in the Batteries shared folder; Filled in blank fields on the Master Chronology List and checked off Routing "On Master List" field in Catalyst; Meeting; Finding and coding IIT (Institute of Information Technology) reports in Catalyst.	8	150	\$1,200.00	L140	CL
7/27/2015	Process document productions; prepare third-party productions for defendants; update case file.	1.6	250	\$400.00	L140	BRM
7/27/2015	Follow up with the following third parties regarding data productions: Home Depot, Lenovo.	0.7	600	\$420.00	L390	SES
7/27/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	3.1	550	\$1,705.00	L140	RSS
7/28/2015	Prepared letter to PC Richard & Son following up the document production subpoena.	1	250	\$250.00	L390	JSD
7/28/2015	Reviewer's meeting; Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE
7/28/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L390	JDF
7/28/2015	LIB LGC/SDI document review; reviewer's meeting.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/28/2015	Saved Ozak, Bob Rauh, and Toshiba batch memos in the Batteries shared folder; Put new production documents of LGC into the right Collections in Catalyst; Added new production documents of Samsung SDI, LG Chem, and Sanyo on the Batteries Assignments Master List; Added Amy's hot documents on the Master list; Filled in blank fields on the Master Chronology List and checked off Routing "Lateries" field in Catalyst; Finding and coding IIT (Institute of Information Technology) reports in Catalyst.	8	150	\$1,200.00	L140	CL
7/28/2015	Process document productions and send to database provider; update case file.	2.1	250	\$525.00	L140	BRM
7/28/2015	Attend discovery conference with LG Chem on search terms.	0.5	600	\$300.00	L390	SES
7/28/2015	Follow up with the following third parties regarding data productions: US Cellular, Verizon, Amazon, Beach Camera, Newegg, Fry's, Conn's, Avnet, PC Connection, Home Depot.	1.7	600	\$1,020.00	L390	SES
7/28/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	3.1	550	\$1,705.00	L140	RSS
7/29/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
7/29/2015	Saved Bob Rauh batch memo in the Batteries shared folder; Filled in blank fields on the Master Chronology List and checked off Routing " " field in Catalyst; Finding and coding in Catalyst.	8	150	\$1,200.00	L140	CL
7/29/2015	Update case file.	0.3	250	\$75.00	L140	BRM
7/29/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	5.8	550	\$3,190.00	L140	RSS
7/30/2015	Review of DPP translations.	8	350	\$2,800.00	L140	JC
7/30/2015	Reviewed third party subpoena chart and identified third parties that have not responded to subpoenas; updated third party chart.	2.5	250	\$625.00	L390	JSD
7/30/2015	Updating rssrequestcode documents; Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/30/2015	Attn case management issues.	2.2	700	\$1,540.00	L120	JDF
7/30/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
7/30/2015	Filled in blank fields on the Master Chronology List and checked off Routing field in Catalyst; Finding and coding IIT (Institute of Information Technology) reports in Catalyst.	8	150	\$1,200.00	L140	CL
7/30/2015	Prepare for and attend call with AT&T regarding subpoena for production of data and documents.	0.5	600	\$300.00	L390	SES
7/30/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	4.1	550	\$2,255.00	L140	RSS
7/31/2015	Review of DPP translations.	7.5	350	\$2,625.00	L140	JC
7/31/2015	Downloaded defendants' document production from ftp site and saved the same to case file.	2	250	\$500.00	L140	JSD
7/31/2015	Working on Minoru Kondo (Panasonic) depo memo.	8	125	\$1,000.00	L140	AE
7/31/2015	Attn. discovery; depo scheduling and identification; defendants objections review.	3.5	700	\$2,450.00	L390	JDF
7/31/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
7/31/2015	Filled in blank fields on the Master Chronology List and checked off Routing field in Catalyst; Updated CT translation documents status on the Master List. Updated transactional data status in Catalyst; Put new production documents of LGC and SANYO-C into the right Collections in Catalyst.	8	150	\$1,200.00	L140	CL
7/31/2015	Process document productions.	1.2	250	\$300.00	L140	BRM
7/31/2015	Attend search term call with NEC and NEC Tokin.	0.7	600	\$420.00	L390	SES
7/31/2015	Call with Fry's re production of data in response to subpoena. Email to experts re same.	0.2	600	\$120.00	L390	SES
7/31/2015	Manage and organize document review and coding process. Oversee review team. Collect evidence and organize information in charts. Plan next projects and search strategy. Manage database and organization of incoming productions. Oversee translation process. Organize and plan deposition prep evidence collection tasks. Update review team and field questions re coding.	7.1	550	\$3,905.00	L140	RSS
8/1/2015	Review of emails re review team projects.	0.5	550	\$275.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/3/2015	LIB team meeting; Review of DPP translations; Review of defense translation in connection with Toshiba summary judgment.	7.5	350	\$2,625.00	L140	JC
8/3/2015	Updated custodian and document production chart.	0.8	250	\$200.00	L120	JSD
8/3/2015	Reviewed third parties objections and responses and updated third parties chart.	1	250	\$250.00	L120	JSD
8/3/2015	Formatted and proofed declaration re authenticity of data (Fry's).	1	250	\$250.00	L210	JSD
8/3/2015	Team meeting; Working on Minoru Kondo (Panasonic) memo.	7.5	125	\$937.50	L140	AE
8/3/2015	Attn fact development re depos.	1.2	700	\$840.00	L110	JDF
8/3/2015	LIB LGC document review; LIB meeting.	8	125	\$1,000.00	L140	JWJ
8/3/2015	Saved J-Hanada batch memo in the Batteries shared folder; Updated CT translation documents status on the Master List. Updated transactional data status in Catalyst; Meeting; Put new production documents of Samsung SDI and SANYO-C into the right Collections in Catalyst; Put in codes field in Catalyst of Helen's Batteries-CA contacts chart; Date all a set of Samsung SDI-B-000028047-28425 documents in Catalyst.	8	150	\$1,200.00	L140	CL
8/3/2015	Update case file; process document productions; update production logs.	3.4	250	\$850.00	L140	BRM
8/3/2015	Re-draft retention letter for industry expert. Communicate with expert regarding assignment, and outline for testimony.	0.5	600	\$300.00	L130	SES
8/3/2015	Call with Newegg regarding production of data in response to non-party subpoena.	0.3	600	\$180.00	L390	SES
8/3/2015	Prepare for and conduct call with co-leads re document review staffing and upcoming depositions.	1.5	600	\$900.00	L120	SES
8/3/2015	Meeting with review team regarding assignments. Review file regarding ongoing assignments. Send follow up email to team regarding Toshiba.	1.6	600	\$960.00	L120	SES
8/3/2015	Draft memo re status of review, review team, projects and translations. Explain systems to larger co-lead group for transition to next review team leader.	6.2	550	\$3,410.00	L140	RSS
8/4/2015	LIB Reviewers' call; Review of defense translation in connection with Toshiba summary judgment.	8	350	\$2,800.00	L140	JC
8/4/2015	Reviewed defendants' subpoenas to third parties and updated third parties chart.	1.2	250	\$300.00	L120	JSD
8/4/2015	Team meeting; Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE
8/4/2015	Fact review; discovery re doc production; depo strategy discussion.	2.5	700	\$1,750.00	L110	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/4/2015	LIB LGC/SDI document review; LIB reviewers meeting.	8	125	\$1,000.00	L140	JWJ
8/4/2015	Searched and marked Fumitsugu Tachihara documents on the Master List. Sorted Tachihara documents to a new chart and sent to Ronnie; Searching for Fumitsugu Tachihara in Catalyst and putting for the codes field; Assigned Mika Otsubo and Ken Sato to Senior Reviewer Roles in Catalyst; Added Amy's new hot documents on the Master List; Meeting with Ronnie.	8	150	\$1,200.00	L140	CL
8/4/2015	Process document productions; update case file.	2.1	250	\$525.00	L140	BRM
8/4/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	5.1	550	\$2,805.00	L140	RSS
8/5/2015	Review of defense translation in connection with Toshiba summary judgment; Search for hot documents for LGC deponent, Donny Lee.	8	350	\$2,800.00	L140	JC
8/5/2015	Formatted retention agreement.	0.5	250	\$125.00	L120	JSD
8/5/2015	Researched the correct entity for Sprint and prepared notice and subpoena for production of documents and served the same.	1.5	250	\$375.00	L311	JSD
8/5/2015	Coding and sending rssrequestcode documents; Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE
8/5/2015	Call with co-counsel re litigation issues; discovery.	1	700	\$700.00	L120	JDF
8/5/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
8/5/2015	Added the search string to all Bates range on the Batteries Assignment- Master List; Added Amy's hot documents on the Master List.	8	150	\$1,200.00	L140	CL
8/5/2015	Process document production; update case file.	0.9	250	\$225.00	L140	BRM
8/5/2015	Review online corporate records regarding location of third party for service of subpoena.	0.8	250	\$200.00	L110	BRM
8/5/2015	Co-lead call regarding discovery, strategy for class certification and expert analysis.	0.8	600	\$480.00	L120	SES
8/5/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	7.1	550	\$3,905.00	L140	RSS
8/6/2015	Search for hot documents for LGC deponent, Donny Lee.	8	350	\$2,800.00	L140	JC
8/6/2015	Saved documents to case file.	0.8	250	\$200.00	L120	JSD
8/6/2015	Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/6/2015	Discovery response review; discussion re meet and confer strategy; expert factual development.	2.5	700	\$1,750.00	L312	JDF
8/6/2015	Saved J_CustReview batch memo in the Batteries shared folder; Checked Batteries CTs on the Master Tracking List with the CTs translation documents in Batteries shared folder and updated CTs on the Master Chronology chart; Put new production documents of NEC and LG Chem into the right Collections in Catalyst; Updated the Batteries Assignment-Master List; Filled in blank fields on the Master List and checked off Routing "On Master List" field in Catalyst.	8	150	\$1,200.00	L140	CL
8/6/2015	Update case file; review status of document uploads; process third-party production correspondence.	1	250	\$250.00	L140	BRM
8/6/2015	Attend discovery conference with Toshiba regarding IPP's discovery responses.	0.7	600	\$420.00	L390	SES
8/6/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	8	550	\$4,400.00	L140	RSS
8/7/2015	Search for hot documents for LGC deponent, Donny Lee.	7.5	350	\$2,625.00	L140	JC
8/7/2015	Formatted and proofed motion to seal and prepared proposed order.	1.2	250	\$300.00	L210	JSD
8/7/2015	Formatted and proofed Joint Letter brief, prepared redacted copy, and e-filed the same. Served sealed copy to counsel.	5	250	\$1,250.00	L210	JSD
8/7/2015	Formatted and proofed letter to counsel.	1	250	\$250.00	L210	JSD
8/7/2015	Working on Minoru Kondo (Panasonic) memo.	8	125	\$1,000.00	L140	AE
8/7/2015	Analysis of defendants' document and data production issues to date.	1.7	700	\$1,190.00	L120	JDF
8/7/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
8/7/2015	Put new production documents of SANYO-C and NEC into the right Collections in Catalyst; Updated the Batteries Assignment-Master List; Date all a set of Samsung SDI-B-000032548-32918 documents in Catalyst; Filled in blank fields on the Master List and checked off Routing "On Master List" field in Catalyst.	8	150	\$1,200.00	L140	CL
8/7/2015	Gather and organize related-case pleadings for attorney review; update production log and case file.	2.2	250	\$550.00	L120	BRM
8/7/2015	Calls with third parties Avnet and Office Depot regarding productions of data. Email to Home Depot and Adorama Camera re same.	0.5	600	\$300.00	L390	SES
8/7/2015	Draft letter to all defense counsel re retention of Dr. von Sacken.	1.2	600	\$720.00	L130	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Communicate with co-lead counsel re same. Research regarding					
8/7/2015	Call with Dr. von Sacken	0.5	600	\$300.00	L130	SES
8/7/2015	Coordinate with DPPs re filing of motion to compel deposition of Kwak under seal. Telephone call with counsel for LG Chem re same. Draft administrative motion to file under seal and proposed order. Oversaw filing of administrative motion and accompanying joint letter brief.	4.2	600	\$2,520.00	L210	SES
8/7/2015	Review assignments of all Batteries review platform. Create spreadsheet regarding assignments moving forward.	1	600	\$600.00	L140	SES
8/7/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	6.1	550	\$3,355.00	L140	RSS
8/8/2015	Review of emails re reviewer questions and Catalyst.	0.6	550	\$330.00	L140	RSS
8/10/2015	LIB team meeting; Search for hot documents for LGC deponent, Donny Lee.	7.7	350	\$2,695.00	L140	JC
8/10/2015	Formatted, proofed and served letter to non-parties PCM, CompUSA and Ingram Micro.	2.5	250	\$625.00	L311	JSD
8/10/2015	Prepare for and call with expert re class cert issues.	2.2	700	\$1,540.00	L130	JDF
8/10/2015	LIB LGC document review; LIB meeting.	8	125	\$1,000.00	L140	JWJ
8/10/2015	Date all a set of Samsung SDI-B-000045923-48842 457 documents in Catalyst; meeting.	5.7	150	\$855.00	L140	CL
8/10/2015	Update case file.	0.8	250	\$200.00	L140	BRM
8/10/2015	Attend calls with IPPs and DPPs regarding strategy for Toshiba Rule 30(b)(6) deponent, timing of depositions and topics in notice related to pending motion.	0.8	600	\$480.00	L390	SES
8/10/2015	Call with Sears/Craftsman regarding subpoena for data.	0.2	600	\$120.00	L390	SES
8/10/2015	Attend discovery conference with Toshiba regarding Rule 30(b)(6) deposition, contents and timing for deposition.	0.5	600	\$300.00	L390	SES
8/10/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	8.3	550	\$4,565.00	L140	RSS
8/11/2015	Reviewers' call; Search for hot documents for LGC deponent, Donny Lee.	8	350	\$2,800.00	L140	JC
8/11/2015	Working on Minoru Kondo (Panasonic) memo; Battery reviewers meeting; Battery meeting with Ronnie; Searching for Minoru Kondo expense reports; Working on NEC Japanese-language search terms.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/11/2015	Document review of hot documents; analysis re conspiracy arguments.	2.2	700	\$1,540.00	L120	JDF
8/11/2015	LIB LGC/SDI document review; LIB reviewers meeting.	8	125	\$1,000.00	L140	JWJ
8/11/2015	Saved H Kubo, DW Lee, NEC Takeshima, J_CustReview, and Masako Kobayashi batch memo in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
8/11/2015	Update case file.	0.7	250	\$175.00	L140	BRM
8/11/2015	Email to experts	0.2	600	\$120.00	L130	SES
8/11/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	7.1	550	\$3,905.00	L140	RSS
8/12/2015	Search for hot documents for LGC deponent, Donny Lee.	7.7	350	\$2,695.00	L140	JC
8/12/2015	Reviewed WOJ invoices re service of subpoenas and resolved issues with billing.	2	250	\$500.00	L120	JSD
8/12/2015	Formatted and proofed Plaintiffs' Representation Statement.	1.5	250	\$375.00	L120	JSD
8/12/2015	Working on NEC Japanese-language search terms; Working on memo; Working on Panasonic/Sanyo Japanese-language search terms.	8	125	\$1,000.00	L140	AE
8/12/2015	Prepare and call re case updates.	1	700	\$700.00	L120	JDF
8/12/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
8/12/2015	Meeting with Ronnie for H Kubo expense reports.	1	150	\$150.00	L140	CL
8/12/2015	Update case file; process third-party productions for experts.	0.9	250	\$225.00	L140	BRM
8/12/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	5.2	550	\$2,860.00	L140	RSS
8/13/2015	Search for hot documents for LGC deponent, Donny Lee.	7.5	350	\$2,625.00	L140	JC
8/13/2015	Sending rssrequestcode documents; Creating chart of Panasonic contacts from Minoru Kondo memo; Working on Minoru Kondo (Panasonic) depo memo and background memo.	8	125	\$1,000.00	L140	AE
8/13/2015	Review and translate documents from Korean defendants LGC and SDI.	8	125	\$1,000.00	L140	JWJ
8/13/2015	Saved LIB Toshiba supplemental Memo and LIB H Ozak batch memo to the Batteries shared folder; Searched for M Kondo expense reports in Catalyst; Added new Batteries Defendant Production documents with bates ranges on the Batteries Assignment-Master List; Added Amy's hot documents on the Master List. Filled in blank fields on the Master List; Added new Batteries	2.5	150	\$375.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	CT translation documents on the Master List.					
8/13/2015	Update case file; process document productions; review status of third-party productions; prepare third-party productions for production to defendants.	1.2	250	\$300.00	L140	BRM
8/13/2015	Review documents in preparation for LG Chem depositions of Andrew Chung and Donny Lee.	3.6	600	\$2,160.00	L330	SES
8/13/2015		2.1	600	\$1,260.00	L160	SES
8/13/2015	Call with DPPs regarding	0.5	600	\$300.00	L390	SES
8/13/2015	Outline responsibilities for document reviewers. Propose to co-leads. Attend co-lead call to discuss strategy and organization.	1.8	600	\$1,080.00	L140	SES
8/13/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	6.2	550	\$3,410.00	L140	RSS
8/14/2015	Search for hot documents for LGC deponent, Donny Lee.	7.5	350	\$2,625.00	L140	JC
8/14/2015	Reviewed meet and confer items and updated third party chart.	1.5	250	\$375.00	L120	JSD
8/14/2015	Working on Minoru Kondo (Panasonic) depo memo and background memo; Working on Takanao Matsumoto (Sanyo) depo memo.	8	125	\$1,000.00	L140	AE
8/14/2015	Update case file; process document productions for loading.	1.3	250	\$325.00	L140	BRM
8/14/2015	Update charts and consolidate evidence collected to date. Manage review team and projects. Manage translation projects. Draft transition memo explaining systems and projects.	2.7	550	\$1,485.00	L140	RSS
8/17/2015	LIB conference call with other IPP representatives.	0.5	350	\$175.00	L140	JC
8/17/2015	Located and pulled documents, and attended to attorney's request.	1.5	250	\$375.00	L120	JSD
8/17/2015	Working on Takanao Matsumoto (Sanyo) depo memo; Battery reviewers meeting.	8	125	\$1,000.00	L140	AE
8/17/2015	LIB reviewers meeting; Meeting with Shana and Shinae.	1	125	\$125.00	L140	JWJ
8/17/2015	Process document productions; review productions for custodian information; update case file.	3.1	250	\$775.00	L140	BRM
8/17/2015	Call with co-leads from IPP and DPP groups	0.5	600	\$300.00	L390	SES
8/17/2015	Call with review team members regarding assignments.	1	600	\$600.00	L140	SES
8/17/2015	Call with counsel for Kodak regarding non-party subpoena.	0.1	600	\$60.00	L390	SES
8/17/2015	Call with Panasonic/Sanyo regarding Rule 30(b)(6) notice.	0.5	600	\$300.00	L390	SES
8/17/2015	Answering emails from Sawa Nagano re Catalyst and searches.	0.1	550	\$55.00	L140	RSS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/17/2015	Review of emails from Jongguk Choi re SDIA.	0.2	550	\$110.00	L140	RSS
8/18/2015	Working on Takanao Matsumoto (Sanyo) depo memo.	6	125	\$750.00	L140	AE
8/18/2015	Saved CT final translation documents of TSB-LIB from Richard to the Batteries shared folder. Saved the Kwak translation documents of LGC and full rough translation doc of TSB-LIB from Shinae to the Batteries shared folder. Updated new production documents of TSB-LIB the Assignment Master List.Put 2 set of new production documents of TSB-LIB into the right Collections.	0.5	150	\$75.00	L140	CL
8/18/2015	Update case file.	0.7	250	\$175.00	L140	BRM
8/18/2015	Call with experts regarding	0.8	600	\$480.00	L130	SES
8/19/2015	Search for hot documents	6	350	\$2,100.00	L140	JC
8/19/2015	Cleaned up and updated meet and confer chart.	1	250	\$250.00	L120	JSD
8/19/2015	Reviewed docket and updated Service List.	1	250	\$250.00	L120	JSD
8/19/2015	Formatted and proofed Amazon motion to compel; located and pulled similar motion to compel in other cases.	4	250	\$1,000.00	L210	JSD
8/19/2015	Working on Takanao Matsumoto (Sanyo) depo memo; Reviewing Daiichiro Eguchi (Toshiba) documents.	7	125	\$875.00	L140	AE
8/19/2015	Emailed Helpdesk to release two large zip files of Batteries CT translation documents that has been quarantined by system. Saved CT translation documents of SDI-LIB from Richard and Sony-LIB translation for IPPs from Amanda in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
8/19/2015	Update case file; review documents regarding motion to compel in related case.	1.3	250	\$325.00	L140	BRM
8/19/2015	Conferences with non-parties CompuCom, Amazon and Sprint regarding data in response to IPPs' subpoena.	0.5	600	\$300.00	L390	SES
8/19/2015	Review of emails from Cathy Smith re translation issues and proofing.	0.2	550	\$110.00	L140	RSS
8/20/2015	Search for hot documents	10	350	\$3,500.00	L140	JC
8/20/2015	Prepared comparison of the discovery coordination portion of the Order re Deposition Protocol.	1.5	250	\$375.00	L210	JSD
8/20/2015	Reviewing Daiichiro Eguchi (Toshiba) documents.	6.8	125	\$850.00	L140	AE
8/20/2015	Review documents relating at request of SES.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/20/2015	Case Map training. Emailed Helpdesk to release a large zip file of Batteries CT translation documents that has been quarantined by system. Saved CT translation documents of SDI-LIB Part 2 from Richard and DPPs full rough translation from Shinae in the Batteries shared folder.	1.2	150	\$180.00	L140	CL
8/20/2015	Emails to Amazon, Canon and Bosch regarding responses to subpoena.	0.5	600	\$300.00	L390	SES
8/20/2015	Call with Dell regarding production of data in response to subpoena and amendments to deposition protocol.	0.5	600	\$300.00	L390	SES
8/20/2015	Review administrative motion to change time regarding Toshiba motion for summary judgment and Kubo. Confer with A. Sheanin re same.	1.5	600	\$900.00	L120	SES
8/20/2015	Conduct call regarding review management.	0.3	600	\$180.00	L140	SES
8/21/2015	Search for hot documents relating	10	350	\$3,500.00	L140	JC
8/21/2015	Prepared notice and subpoena for the production of documents to third parties, updated Attachment A.	3	250	\$750.00	L311	JSD
8/21/2015	Reviewed dockets, calendar, local rules, and magistrate judge's standing orders.	1.5	250	\$375.00	L120	JSD
8/21/2015	Trying to figure out Catalyst search features; Reviewing Hiroshi Kubo (Toshiba) documents; Working on Panasonic/ <u>Pioneer search term responses</u> .	8	125	\$1,000.00	L140	AE
8/21/2015	Search for Chinese documents in Catalyst re:	3	350	\$1,050.00	L140	HH
8/21/2015	Review documents relating at request of SES.	8	125	\$1,000.00	L140	JWJ
8/21/2015	Emailed Helpdesk to release a large zip file of Batteries CT translation documents that has been quarantined by system. Saved CT translation documents of TSB-LIB from Richard in the Batteries shared folder. Saved TSB-LIB foreign original doc from Shinae to the Batteries shared folder. Updated new production documents of TSB-LIB the Assignment Master List. Put new production documents of TSB-LIB (Daiichiro, Kubo, and Fujitomo) into the right Collections.	0.5	150	\$75.00	L140	CL
8/21/2015	Update case file; process document productions.	0.8	250	\$200.00	L140	BRM
8/21/2015	Call with AT&T regarding production of data in response to non-party subpoena. Update chart with notes regarding conversation.	0.5	600	\$300.00	L390	SES
8/24/2015	Team meeting; Search for hot documents relating to	7.6	350	\$2,660.00	L140	JC
8/24/2015	Updated notice and subpoena for the production of documents to third parties, and served the same.	1.5	250	\$375.00	L311	JSD
8/24/2015	Proofed Amazon motion to compel.	2	250	\$500.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/24/2015	Working on Panasonic/Sanyo IPP search term responses; Weekly Battery reviewers meeting.	8.5	125	\$1,062.50	L140	AE
8/24/2015	Batteries - Search fo <u>r Chines</u> e documents in Catalyst re: and review.	7.5	350	\$2,625.00	L140	HH
8/24/2015	Team meeting; LIB document review.	7.5	125	\$937.50	L140	JWJ
8/24/2015	Emailed Helpdesk to release two large zip files of LIB - CT translation documents that has been quarantined by system; Saved CT translation documents of TSB-LIB in the Batteries shared folder; Renamed CT translation documents of Fujimoto, Eguchi, and Kubo from Richard and saved in the Batteries shared folder; Updated LIB new production documents of PANA-C and PNA Bates ranges on the Assignment Master List; Put new production documents of PANA-C and PNA into the right Collections; Updated LIB - CT translation documents from Richard in Catalyst.	7.3	150	\$1,095.00	L140	CL
8/24/2015	Update case file; review defendant transactional data production regarding question	0.9	250	\$225.00	L140	BRM
8/24/2015	Meeting with reviewers regarding assignments.	0.5	600	\$300.00	L140	SES
8/25/2015	Search for hot documents relating to	10	350	\$3,500.00	L140	JC
8/25/2015	Formatted and proofed letter to Newegg counsel re claw back agreement, and served the same.	1.5	250	\$375.00	L210	JSD
8/25/2015	Formatted Amazon's Objections and Responses into an Attachment A to the motion to compel.	1.5	250	\$375.00	L210	JSD
8/25/2015	Proofed Amazon motion to compel, and prepared Certificate of Service.	2	250	\$500.00	L210	JSD
8/25/2015	Updated third party chart.	0.5	250	\$125.00	L120	JSD
8/25/2015	Call with Marc Pilotin and Sawa Nagano re Hiroshi Kubo (Toshiba) doc coding progress; Answering LIB document questions for coworker; Coding Hiroshi Kubo (Toshiba) documents; Researching Hiroshi Kubo (Toshiba) document questions; Working on Panasonic/Sanyo IPP search term responses; Working on HML search term responses.	9	125	\$1,125.00	L140	AE
8/25/2015	Batteries - Search for Chinese <u>documents</u> in Catalyst re: and review.	8	350	\$2,800.00	L140	HH
8/25/2015	Review documents relating to at request of SES.	8	125	\$1,000.00	L140	JWJ
8/25/2015	Updated LIB - CT translation documents from Richard in Catalyst.	3.5	150	\$525.00	L140	CL
8/25/2015	Update case file; process document production; attempt download of further production.	1.4	250	\$350.00	L140	BRM
8/25/2015	Call with counsel for DPPs regarding LG Chem depositions, document production schedule and email from LG Chem's counsel. Send follow up	0.2	600	\$120.00	L390	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	email to DPP's counsel.					
8/25/2015	Follow up emails and voicemails to third parties regarding compliance with subpoena: Wal-Mart, Sprint, SED, Ingram Micro, DBL Distributing, US Cellular, Staples, Newegg, T-Mobile and AT&T. Update log with contacts and summary of status.	0.8	600	\$480.00	L390	SES
8/25/2015	Discovery conference with third-party Canon regarding data subpoena.	0.5	600	\$300.00	L390	SES
8/25/2015	Research and draft motion to compel production of data from third-party Amazon. Circulate to co-leads for comment.	2.1	600	\$1,260.00	L210	SES
8/26/2015	Search for hot documents relating to	10	350	\$3,500.00	L140	JC
8/26/2015	Reviewed docket and updated service list.	1	250	\$250.00	L120	JSD
8/26/2015	Researched proper entity and location, and prepared notice and subpoenas to third parties.	2.5	250	\$625.00	L311	JSD
8/26/2015	Call with Demetrius, Sawa, and others re Hiroshi Kubo CTs; Researching Hiroshi Kubo (Toshiba) document questions; Coding Hiroshi Kubo (Toshiba) documents.	7.8	125	\$975.00	L140	AE
8/26/2015	Prepare for attend call re case developments/updates.	1	700	\$700.00	L120	JDF
8/26/2015	Batteries - Search for Chinese documents in Catalyst re: and review.	6	350	\$2,100.00	L140	HH
8/26/2015	Review documents relating to at request of SES.	8	125	\$1,000.00	L140	JWJ
8/26/2015	Combined LIB - LG Chem from IPP and DPP charts of Donny Lee into one chart with different colors and merged information of duplicate documents into new columns. Sent the Excel chart to Shana; Updated new production documents of TSB-LIB Bates ranges on the Assignment Master List; Put new production documents of TSB-LIB into the right Collections.	3.5	150	\$525.00	L140	CL
8/26/2015	Process document productions; update case file; establish custodian count for production.	2.4	250	\$600.00	L140	BRM
8/26/2015	Call with LG Chem regarding document productions for Donny Lee and Andrew Chung; certification when productions are complete; privilege log issues and production of documents on a rolling basis.	1	600	\$600.00	L390	SES
8/26/2015	Call with Microsoft/Nokia regarding response to nonparty subpoena.	0.5	600	\$300.00	L390	SES
8/26/2015	Call with co-leads re experts, discovery and strategy.	0.6	600	\$360.00	L120	SES
8/26/2015	Call with DAP liaison counsel re Toshiba depositions and amendments to the deposition protocol. Follow up email to co-leads for DPPs and IPPs.	0.5	600	\$300.00	L390	SES
8/27/2015	Search for hot documents relating to	8	350	\$2,800.00	L140	JC
8/27/2015	Reviewed WOJ invoices re service of subpoenas and resolved issues with	1	250	\$250.00	L120	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	billing.					
8/27/2015	Updated third parties' chart.	0.6	250	\$150.00	L120	JSD
8/27/2015	Preparing Takanao Matsumoto (Sanyo) depo memo.	7.5	125	\$937.50	L140	AE
8/27/2015	Review documents relating to at request of SES.	8	125	\$1,000.00	L140	JWJ
8/27/2015	Saved SANYO full rough translation doc from Shinae in the Batteries shared folder; Updated new production documents of TSB-LIB, PANA, PNA, and SANYO Bates ranges on the Assignment Master List; Put new production documents of TSB-LIB, PANA, PNA, and SANYO into the right Collections.	2	150	\$300.00	L140	CL
8/27/2015	Update case file; review pleadings and correspondence regarding protective order issue.	1.2	250	\$300.00	L140	BRM
8/27/2015	Conference call with Amazon re nonparty subpoena. Send Amazon data from ODD given that files were corrupt at their law firm. Communicate with BRM re same. Update Chart.	0.3	600	\$180.00	L390	SES
8/28/2015	Search for hot documents relating to	9	350	\$3,150.00	L140	JC
8/28/2015	Updated third party chart.	0.7	250	\$175.00	L120	JSD
8/28/2015	Coding Hiroshi Kubo (Toshiba) documents.	6.8	125	\$850.00	L140	AE
8/28/2015	Update case file; coordinate with third party regarding transfer of transactional data; process document productions.	1.8	250	\$450.00	L140	BRM
8/28/2015	Call with A. Yu regarding data from DBL Distributing. Update chart re same.	0.2	600	\$120.00	L390	SES
8/31/2015	Search for hot documents relating to	10	350	\$3,500.00	L140	JC
8/31/2015	Coding and sending Hiroshi Kubo (Toshiba) documents; Running targeted searches and preparing Takanao Matsumoto (Sanyo) depo memo; Researching Pioneer likely-hot documents and Pioneer-Sony connection.	8	125	\$1,000.00	L140	AE
8/31/2015	Team meeting.	0.5	125	\$62.50	L140	JWJ
8/31/2015	Updated LIB new production documents of HML Bates ranges on the Assignment Master List; Put new production documents of HML into the right Collections; Saved CT translation documents from Anna to Batteries shared folder; Updated CT translation documents in Catalyst.	4	150	\$600.00	L140	CL
8/31/2015	Process document production; update case file.	1.3	250	\$325.00	L140	BRM
9/1/2015	Search for hot documents relating to	10	350	\$3,500.00	L140	JC
9/1/2015	Took inventory of plaintiffs' issued subpoenas and defendants' issued subpoenas to third parties; update third party chart.	2	250	\$500.00	L390	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/1/2015	Running targeted searches and preparing Takanao Matsumoto (Sanyo) depo memo.	7	125	\$875.00	L140	AE
9/1/2015	Review documents relating to at request of SES.	8	125	\$1,000.00	L140	JWJ
9/1/2015	Emailed Helpdesk to release a large zip file of LIB - CT translation documents that has been quarantined by system. Saved CT translation documents of TSB-LIB in the Batteries shared folder; Updated LIB new production documents of PANA-C and SANYO-C Bates ranges on the Assignment Master List; Put new production documents of PANA-C and SANYO-C into the right Collections.	0.7	150	\$105.00	L140	CL
9/1/2015	Update case file; process document productions; coordinate with Catalyst regarding loading; review production load files to determine custodians.	4.2	250	\$1,050.00	L140	BRM
9/1/2015	Call with Canon's outside counsel regarding non-party subpoena.	0.3	600	\$180.00	L390	SES
9/2/2015	Search for hot documents relating to	8	350	\$2,800.00	L140	JC
9/2/2015	Calendared deposition dates.	0.3	250	\$75.00	L120	JSD
9/2/2015	Running targeted searches and preparing Takanao Matsumoto (Sanyo) depo memo.	8	125	\$1,000.00	L140	AE
9/2/2015	Attn. discovery data.	2.5	700	\$1,750.00	L140	JDF
9/2/2015	Review Chinese/Japanese doc - SANYO-C000100206, and provide a summary.	0.8	350	\$280.00	L140	НН
9/2/2015	Review documents relating to at request of SES.	8	125	\$1,000.00	L140	JWJ
9/2/2015	Updated new production documents of HML-P of Seiji Sumoto Bates ranges on the Assignment Master List; Put new production documents of HML-P of Seiji Sumoto into the right Collections; Casemap training.	2.3	150	\$345.00	L140	CL
9/2/2015	Process document productions; update case file; review production load files for identification of custodians.	3.1	250	\$775.00	L140	BRM
9/3/2015	Translation of exhibit doc for the experts; Search for hot documents relating to	9	350	\$3,150.00	L140	JC
9/3/2015	Calendared deposition dates.	0.3	250	\$75.00	L120	JSD
9/3/2015	Running targeted searches, preparing, and sending Takanao Matsumoto (Sanyo) depo memo; Looking for additional Minoru Kondo (Panasonic) documents that need a CT; Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	8	125	\$1,000.00	L140	AE
9/3/2015	Review documents relating to at request of SES.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/3/2015	Emailed Helpdesk to release a large zip file of LIB - CT translation documents that has been quarantined by system; Saved CT translation documents of TSB-LIB in the Batteries shared folder; Updated LIB new production documents of NECT and SONY-LIB Bates ranges on the Assignment Master List; Put new production documents of NECT and SONY-LIB into the right collections; Check off "Certified translation documents" field in Catalyst and also empty "Certified translation documents" field if there is no CT translation doc in the Batteries shared folder and on the Master Tracking List for CTs.	7.9	150	\$1,185.00	L140	CL
9/3/2015	Update case file; process document production; update production logs; send third-party documents to co-counsel.	1.3	250	\$325.00	L140	BRM
9/3/2015	Call with S. Meenan re Takeshima documents.	0.2	600	\$120.00	L390	SES
9/4/2015	Search for hot documents relating to and LGC deponents (Donny Lee and YW Chung).	10	350	\$3,500.00	L140	JC
9/4/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	6.3	125	\$787.50	L140	AE
9/4/2015	Expert call preparation.	1.8	700	\$1,260.00	L130	JDF
9/4/2015	Saved Exhibit B to McGowan Lamberg from Shinae to the Batteries shared folder; Added documents from the Master List to Casemap Document.	6.5	150	\$975.00	L140	CL
9/4/2015	Process document productions; coordinate with Catalyst vendor regarding loading; update case file.	1.5	250	\$375.00	L140	BRM
9/4/2015	Call with DAP liaison counsel and DPPs regarding amendments to deposition protocol.	0.5	600	\$300.00	L120	SES
9/4/2015	Call with co-leads regarding strategy and discovery.	0.8	600	\$480.00	L120	SES
9/4/2015	Edit plaintiffs' joint statement re defendants' motion to compel further responses to class definition.	2	600	\$1,200.00	L210	SES
9/8/2015	LIB Reviewers' Call; Search for hot documents of LGC deponents (Donny Lee and Andrew Chung); Translation of LGC doc (antitrust policy).	8	350	\$2,800.00	L140	JC
9/8/2015	Formatted and proofed discovery letter to counsel.	1	250	\$250.00	L311	JSD
9/8/2015	Attn. discovery; document production issues.	1.7	700	\$1,190.00	L210	JDF
9/8/2015	LIB Reviewer's meeting; LIB Document Review.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/8/2015	Emailed Helpdesk to release a large zip file of LIB - CT translation documents that has been quarantined by system. Saved CT translation documents of TSB-LIB in the Batteries shared folder; Updated LIB new production documents of SDI-B Bates ranges on the Assignment Master List; Put new production documents of HML-P, MAX-P, and LGC-MDL into the right Collections; Added documents from the Master List to Casemap Document Chart.	7.5	150	\$1,125.00	L140	CL
9/8/2015	Process document production; update case file.	0.8	250	\$200.00	L140	BRM
9/8/2015	Edit plaintiffs' response to joint discovery letter on plaintiffs' interrogatories.	1	600	\$600.00	L312	SES
9/8/2015	Attend call with expert regarding Rule 30(b)(6) topics. Follow up call with document reviewers. Draft memo to team regarding document review assignments and Rule 30(b)(6) topics.	4	600	\$2,400.00	L130	SES
9/9/2015	Translation of LGC doc (antitrust policy).	8	350	\$2,800.00	L140	JC
9/9/2015	Formatted and proofed joint letter brief, and facilitated exchange thereof.	1.8	250	\$450.00	L210	JSD
9/9/2015	Reviewed docket and update service list.	1.5	250	\$375.00	L120	JSD
9/9/2015	Prepared notice and subpoenas for document production to third parties.	1.5	250	\$375.00	L311	JSD
9/9/2015	Formatted and proofed letter to counsel.	0.5	250	\$125.00	L120	JSD
9/9/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo; Answering coworker's questions re document categories.	7.2	125	\$900.00	L140	AE
9/9/2015	Search for documents in SDI production related to pricing at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
9/9/2015	Added documents from the Master List to Casemap Document Chart.	6	150	\$900.00	L140	CL
9/9/2015	Update case file.	0.4	250	\$100.00	L140	BRM
9/9/2015	Review data from Apple.	0.2	600	\$120.00	L140	SES
9/9/2015	Edit plaintiffs' response to joint discovery letter on plaintiffs' interrogatories. Circulate to co-lead <u>counsel</u> . Send final version to defendants.	1	600	\$600.00	L312	SES
9/9/2015	Call with expert on regarding Rule 30b6 deposition and document requests.	0.6	600	\$360.00	L130	SES
9/9/2015	Prepare for and attend call with Dr. von Sachen regarding Rule 30b6 notice.	0.8	600	\$480.00	L130	SES
9/10/2015	Search for documents of defendant's antitrust policy.	8	350	\$2,800.00	L140	JC
9/10/2015	Prepared notice and subpoenas for document production to third parties.	1.5	250	\$375.00	L311	JSD
9/10/2015	Updated third parties meet and confer chart.	0.5	250	\$125.00	L120	JSD
9/10/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	7	125	\$875.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/10/2015	Call with co-counsel re case update; strategy issues.	1	700	\$700.00	L120	JDF
9/10/2015	Search for documents in SDI production related to pricing at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
9/10/2015	Updated new production documents of PANA, PNA, and SNA Bates ranges on the Assignment Master List; Put new production documents of SDI-B into the right Collections; Added documents from the Master List to Casemap Document Chart; Exported Hot Conspiracy Meeting documents from Catalyst and Sent to Shana; Converted Hot Conspiracy Meeting documents to PDF in Catalyst and downloaded Hot Conspiracy Meeting English documents.	8	150	\$1,200.00	L140	CL
9/10/2015	Update case file; process document productions.	1.3	250	\$325.00	L140	BRM
9/10/2015	Prepare for and attend call with co-leads regarding schedule, expert reports, discovery and upcoming depositions.	1	600	\$600.00	L120	SES
9/11/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	8	125	\$1,000.00	L140	AE
9/11/2015	Search for documents in SDI production related to pricing	8	125	\$1,000.00	L140	JWJ
9/11/2015	Downloaded Hot Conspiracy Meeting English documents and sent to Shana; Updated new production documents of TSB-LIB Bates ranges on the Assignment Master List; Put new production documents of TSB-LIB into the right Collections.	6.5	150	\$975.00	L140	CL
9/11/2015	Process document production; update case file.	1	250	\$250.00	L140	BRM
9/11/2015	Prepare for and attend co-lead meeting regarding discovery, document review and coordination.	4	600	\$2,400.00	L120	SES
9/12/2015	Draft summary of assignments resulting from co-lead meeting. Send email to the group. Include excerpts of certain policy documents for review by co-lead group.	0.5	600	\$300.00	L120	SES
9/14/2015	Proofread LIB document.	2.6	350	\$910.00	L140	JC
9/14/2015	Calendared due dates and deposition dates.	0.6	250	\$150.00	L120	JSD
9/14/2015	Communicated with the class representatives regarding the Toshiba discovery requests.	1	250	\$250.00	L390	JSD
9/14/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	7.7	125	\$962.50	L140	AE
9/14/2015	Search for documents in SDI production related to pricing at request of IPP	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	experts.					
9/14/2015	Merged LIB SH Kwak's hot documents from Word into an Excel chart and sent to Shana; Emailed Helpdesk to release a large zip file of translation documents that has been quarantined by system; Saved CT translation documents of TSB-LIB from Anna in the Batteries shared folder.	4.6	150	\$690.00	L140	CL
9/14/2015	Process third-party document production; update case file; assist with deposition preparation.	2.4	250	\$600.00	L140	BRM
9/15/2015	Proofread LIB document.	8	350	\$2,800.00	L140	JC
9/15/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	5.3	125	\$662.50	L140	AE
9/15/2015	Emailed Helpdesk to release a large zip file of translation documents that has been quarantined by system. Saved CT translation documents of TSB-LIB from Anna in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
9/15/2015	Assist with organization of document review data regarding upcoming depositions for a <u>ttorney</u> review; update case file.	5.8	250	\$1,450.00	L140	BRM
9/15/2015	Review chart of documents.	2.3	600	\$1,380.00	L140	SES
9/16/2015	LIB review team call; Proofread LIB document.	8	350	\$2,800.00	L140	JC
9/16/2015	Reviewed WOJ invoice and resolved issues.	1	250	\$250.00	L120	JSD
9/16/2015	Followed up with the class representatives regarding the Toshiba discovery requests.	1.5	250	\$375.00	L390	JSD
9/16/2015	Weekly Battery reviewer's meeting; Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo.	8	125	\$1,000.00	L140	AE
9/16/2015	Call with counsel re case management; prep re same.	1	700	\$700.00	L120	JDF
9/16/2015	Updated new LIB production documents of PANA, PNA, and SANYO Bates ranges on the Assignment Master List.	0.5	150	\$75.00	L140	CL
9/16/2015	Update case file; review deposition calendar.	0.9	250	\$225.00	L140	BRM
9/16/2015	Call with co-leads re discovery, CMC and class certification.	1	600	\$600.00	L120	SES
9/17/2015	Proofread LIB document.	6.5	350	\$2,275.00	L140	JC
9/17/2015	Running targeted searches and preparing Kazunari Takeshima (NEC Tokin) depo memo; Running targeted searches for Sony roadmaps.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/17/2015	Pulled out PCT, full rough, and English documents from the LIB Combined chart and saved as in LIB shared folder; Created Word doc list from the chart for Shana; Updated document status in Language column on the Batteries Added additional documents on the chart and Word document of Sent all charts at and Word document of and all charts at n the Batteries shared folder.	7.5	150	\$1,125.00	L140	CL
9/17/2015	Process document productions; update case file; organize deposition materials for attorney review.	1.9	250	\$475.00	L140	BRM
9/18/2015	Create list of search terms for DPP reviewers.	1	350	\$350.00	L140	JC
9/18/2015	Putting together suggested Japanese search terms for DPPs; Running targeted searches for Sony roadmaps.	8	125	\$1,000.00	L140	AE
9/18/2015	Downloaded LIB PANA CT translation documents from LCHB and saved in the Batteries shared folder; Pulled out the LIB English and PCT documents on the Supply and Capacity Review 9.18.15 chart for experts.	5	150	\$750.00	L140	CL
9/21/2015	Search for hot documents for YW Chung deposition.	8	350	\$2,800.00	L140	JC
9/21/2015	Updated third party chart.	0.5	250	\$125.00	L120	JSD
9/21/2015	Prepared letter to third parties giving notice of filing under seal; redact documents corresponding to each third party.	1.5	250	\$375.00	L390	JSD
9/21/2015	Pulled out the LIB English and PCT documents on the	6	150	\$900.00	L140	CL
9/21/2015	Update case file.	0.9	250	\$225.00	L140	BRM
9/22/2015	LIB Reviewers' Call; Search for hot documents for YW Chung deposition.	8	350	\$2,800.00	L140	JC
9/22/2015	LIB LGC roadmap document search; LIB Reviewer's Meeting.	8	125	\$1,000.00	L140	JWJ
9/22/2015	Put LIB new production documents of LGC-MDL of Andrew Chung and Donny Lee Bates ranges into the right <u>Collections</u> : Sorted by Date and deleted duplicate documents on the <u>chart</u> .	2.5	150	\$375.00	L140	CL
9/22/2015	Update case file; process document productions; review productions to compile lists of custodians.	2.3	250	\$575.00	L120	BRM
9/23/2015	Expert prep and call with expert.	2	700	\$1,400.00	L130	JDF
9/23/2015	LIB LGC roadmap document search; LIB meeting with Marc Pilotin at Lieff Cabraser.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/23/2015	Updated two set of LIB new production documents of PANA, PNA, SANYO, SNA, and NEC Bates ranges on the Assignment Master List; Put LIB new production documents of PANA, PNA, SANYO, SNA Bates ranges into the right Collections; Deleted duplicate documents on the chart and Sent to Shana.	3.5	150	\$525.00	L140	CL
9/23/2015	Prepare and serve amended deposition notices.	1	250	\$250.00	L330	BRM
9/23/2015	Process document productions; update case file.	1.4	250	\$350.00	L140	BRM
9/23/2015	Discovery conference with LG Chem re outstanding deposition notice and data questions.	0.8	600	\$480.00	L330	SES
9/23/2015	Call with co-leads on deposition notices and document review.	1	600	\$600.00	L330	SES
9/24/2015	Calendared due dates/depo dates.	0.5	250	\$125.00	L120	JSD
9/24/2015	Communicated with the class reps regarding	1.5	250	\$375.00	L390	JSD
9/24/2015	Attn. discovery; expert data questions.	3.5	700	\$2,450.00	L340	JDF
9/24/2015	Saved LIB full rough translation documents of PANA and LGC-MDL from Shinae to the Batteries shared folder; Downloaded and saved PCT translation documents of PANA and TSB-LIB from LCHB to the Batteries shared folder; Combined LIB CHART on the LIB CHART on the LIB Hot Doc chart and sent to Shana; Updated LIB new production documents of TSB-LIB Bates ranges on the Assignment Master List.	1	150	\$150.00	L140	CL
9/24/2015	Update case file; update document production logs.	1	250	\$250.00	L140	BRM
9/25/2015	Proofread of LIB document.	3	350	\$1,050.00	L140	JC
9/25/2015	Communicated with class reps re verification for discovery responses.	1	250	\$250.00	L390	JSD
9/25/2015	Updated third party chart.	0.6	250	\$150.00	L120	JSD
9/25/2015	Updated LIB new production documents of PANA, SANYO, and NEC Bates ranges on the Assignment Master List. Put LIB new production documents of PANA, SANYO, and NEC Bates ranges into the right Collections.	0.5	150	\$75.00	L140	CL
9/25/2015	Update case file.	0.3	250	\$75.00	L140	BRM
9/28/2015	Translation review of LIB document; LIB Team Meeting; Search for hot documents for YW Chung deposition.	7	350	\$2,450.00	L140	JC
9/28/2015	Conference with SES re depositions and case status.	0.5	400	\$200.00	L390	CLC
9/28/2015	Communicated with class reps re Toshiba discovery requests.	1	250	\$250.00	L390	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/28/2015	Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production; Attending weekly Battery meeting; Searching for documents that discuss the battery market as a whole.	7	125	\$875.00	L140	AE
9/28/2015	Edit requests and analyze discovery issues.	2.2	700	\$1,540.00	L210	JDF
9/28/2015	LIB review team meeting with Shana Scarlett.	0.5	125	\$62.50	L140	JWJ
9/28/2015	Downloaded PCT documents of PANA-C, P-DOJ, TSB-LIB, NEC, and LGC-MDL from LCHB and saved in the Batteries shared folder; Updated two set of LIB new production documents of HML-P and TSB-LIB Bates ranges on the Assignment Master List.	0.3	150	\$45.00	L140	CL
9/28/2015	Assist with organization of materials for attorney review regarding deposition preparations; update case file; process document productions.	2.5	250	\$625.00	L140	BRM
9/28/2015	Call with executive committee members re plaintiff depositions.	0.3	600	\$180.00	L330	SES
9/28/2015	Prepare and select documents for deposition of A. Chung (LGC).	4.2	600	\$2,520.00	L330	SES
9/28/2015	Call with DPP counsel regarding LG Chem depositions (Chung, Lee and Kwak).	0.2	600	\$120.00	L330	SES
9/28/2015	Call with M. Pilotin regarding LG Chem 30b6 deposition and upcoming depositions.	0.2	600	\$120.00	L330	SES
9/29/2015	Confer with co-counsel and defendants regarding Rule 30(b)(6) timing and document production.	0.5	400	\$200.00	L390	CLC
9/29/2015	Communicated with class reps re signed verification to discovery requests.	0.7	250	\$175.00	L390	JSD
9/29/2015	Searching for documents that discuss the battery market as a whole.	7.2	125	\$900.00	L140	AE
9/29/2015	Attn discovery coordination; expert materials identification.	2.2	700	\$1,540.00	L340	JDF
9/29/2015	Updated translation column on LIB Excel chart of 09.28.15 SES List of Chung documents. Pulled out PCT and English documents and compressed into a zip file; Formatted an Excel chart of 09.28.15 SES List of Chung documents and printed into a PDF; Sent the Excel chart, PDF file, and a zip file of Andrew Chung to Shana and Brian; Renamed all revised PCT translation documents and saved in the Batteries shared folder; Put LIB new production documents of HML-P, TSB-LIB, PANA, PNA, and SANYO Bates ranges into the right Collections; Downloaded TSB-LIB PCT translation documents from LCHB and saved in the Batteries shared folder.	7	150	\$1,050.00	L140	CL
9/29/2015	Update case file; process document production; organize documents for	2	250	\$500.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	attorney review.					
9/29/2015	Prepare for and attend call with defendants re IPP responses to interrogatories and document requests.	1	600	\$600.00	L390	SES
9/29/2015	Call with Toshiba re Rule 30b6 notice.	0.5	600	\$300.00	L300	SES
9/30/2015	Meeting with co-counsel regarding discovery issues.	0.5	400	\$200.00	L390	CLC
9/30/2015	Communicated with Vermont Class Rep. re equipment receipts and documentation.	0.6	250	\$150.00	L120	JSD
9/30/2015	Prepared Rights and Responsibilities and Client Questionnaire and transmitted the same to Vermont class rep. for filling up and signature.	1.8	250	\$450.00	L120	JSD
9/30/2015	Reporting results of battery market search ; Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production.	8.2	125	\$1,025.00	L140	AE
9/30/2015	Assist with deposition preparations; update case file.	2.3	250	\$575.00	L140	BRM
10/1/2015	Email communications and phone call with other IPP to discuss the matter of reviewing Korean documents.	0.5	350	\$175.00	L140	JC
10/1/2015	Investigation into issues regarding class representative Mike Reilly.	0.1	400	\$40.00	L120	CLC
10/1/2015	Formatted, proofed and served letter to counsel.	1	250	\$250.00	L210	JSD
10/1/2015	Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production.	7.8	125	\$975.00	L140	AE
10/1/2015	Call with co counsel; expert call; attn. discovery.	2.5	700	\$1,750.00	L130	JDF
10/1/2015	Downloaded TSB-LIB PCT translation documents from LCHB; Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
10/1/2015	Update case file; assist with deposition preparations; process document production.	2.1	250	\$525.00	L140	BRM
10/1/2015	Call with co-lead counsel preparing for CMC.	1	600	\$600.00	L120	SES
10/2/2015	Attend status conference; Post-hearing planning meeting with team.	4	900	\$3,600.00	L230	SWB
10/2/2015	Review of DW Lee (LGC deponent) documents; Translation review of LIB documents.	8	350	\$2,800.00	L140	JC
10/2/2015	Research and drafted memorandum re 'lease law purposes of Rule 30(b)(1) analysis and LGC witness Kwak, pending before Magistrate Judge Ryu.	0.5	400	\$200.00	L210	CLC
10/2/2015	Research and drafted memorandum re 'lease law purposes of Rule 30(b)(1) analysis and LGC witness Kwak, pending before Magistrate Judge Ryu.	1.5	400	\$600.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/2/2015	Research and drafted memorandum re "law purposes of Rule 30(b)(1) analysis and LGC witness Kwak, pending before Magistrate Judge Ryu.	2.5	400	\$1,000.00	L210	CLC
10/2/2015	Research and drafted memorandum reasonable law purposes of Rule 30(b)(1) analysis and LGC witness Kwak, pending before Magistrate Judge Ryu.	2	400	\$800.00	L210	CLC
10/2/2015	Reading Battery case motion documents; Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production.	7.5	125	\$937.50	L140	AE
10/2/2015	Prepare for and attend CMC hearing.	3.5	700	\$2,450.00	L230	JDF
10/2/2015	Updated LIB new production documents of LG Chem and NEC Bates ranges on the Assignment Master List; Put LG Chem and NEC into the right collections.	0.5	150	\$75.00	L140	CL
10/2/2015	Download third-party data and forward to experts; update case file; coordinate with co-counsel regarding inadvertently produced document.	2.6	250	\$650.00	L140	BRM
10/2/2015	Call with ASUS re case status.	0.2	600	\$120.00	L390	SES
10/2/2015	Conference call with S. Scarlett re Matsumoto deposition.	0.1	575	\$57.50	L330	IAT
10/4/2015	Research and drafted memorandum re "Research law purposes of Rule 30(b)(1) analysis and LGC witness Kwak, pending before Magistrate Judge Ryu.	2	400	\$800.00	L210	CLC
10/5/2015	Prepared documents for filling up and signature of new Vermont class reps.	1.2	250	\$300.00	L120	JSD
10/5/2015	Prepared notice and subpoenas for third party document production; scouted locations for document production venue; served the same.	1.2	250	\$300.00	L311	JSD
10/5/2015	Located and pulled case cites for Kwak motion.	1	250	\$250.00	L210	JSD
10/5/2015	Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production; Attending weekly Battery meeting.	8	125	\$1,000.00	L140	AE
10/5/2015	LIB Meeting with Shana.	0.5	125	\$62.50	L140	JWJ
10/5/2015	Updated LIB new production documents of LG Chem and NEC Bates ranges on the Assignment Master List; Putted LIB new production documents of LG Chem and NEC into the right Collections.	0.5	150	\$75.00	L140	CL
10/5/2015	Update case file; update calendar.	1.1	250	\$275.00	L140	BRM
10/5/2015	Prepare for and attend call with DAPs and defendants regarding amendments to deposition protocol.	1.8	600	\$1,080.00	L390	SES
10/5/2015	Research and draft opposition to LG Chem defendants' motion for relief from Non-Dispositive Pretrial Order of Magistrate Judge (Kwak).	4.6	600	\$2,760.00	L210	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/5/2015	Analyze complaint, motion to dismiss pleadings, depo memo, and hot doc chronology re Matsumoto depo preparation.	2.5	575	\$1,437.50	L330	IAT
10/6/2015	Translation review of LiB document.	3	350	\$1,050.00	L140	JC
10/6/2015	Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production.	4.8	125	\$600.00	L140	AE
10/6/2015	Attn discovery responses by defendants.	2.5	700	\$1,750.00	L312	JDF
10/6/2015	LIB Meeting with Marc Pilotin; LIB LGC document search for experts.	8	125	\$1,000.00	L140	JWJ
10/6/2015	Downloaded LG Chem, PANA, TSB-LIB, Sanyo, and S-DOJ PCT translation documents from LCHB. Renamed PCT translation documents and saved in the Batteries shared folder; Updated LIB new production documents of PANA and SANYO Bates ranges on the Assignment Master List.	0.6	150	\$90.00	L140	CL
10/6/2015	Process document production; update case file.	0.9	250	\$225.00	L140	BRM
10/6/2015	Research and draft opposition to LG Chem defendants' motion for relief from Non-Dispositive Pretrial Order of Magistrate Judge (Kwak).	7.1	600	\$4,260.00	L210	SES
10/6/2015	Participate in discovery conference with DAPs and Sanyo/Panasonic defendants regarding scheduling of Matsumoto deposition and documents.	0.9	600	\$540.00	L390	SES
10/7/2015	Translation review of LiB document.	5.7	350	\$1,995.00	L140	JC
10/7/2015	Coordinated with new class reps to secure signed documents.	0.4	250	\$100.00	L120	JSD
10/7/2015	Translating Toshiba documents for a deposition; Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production; Researching and answering Shana's question re	8.5	125	\$1,062.50	L140	AE
10/7/2015	Attn deposition preparation.	2.5	700	\$1,750.00	L330	JDF
10/7/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/7/2015	Formatted TSB-LIB-00008576-82PT, TSB-LIB-00008583PT, TSB-LIB-00008584PT and sent to Shinae and Demetrius.	3	150	\$450.00	L140	CL
10/7/2015	Process document productions; update case file.	1	250	\$250.00	L140	BRM
10/8/2015	Translation review of LiB document.	8	350	\$2,800.00	L140	JC
10/8/2015	Read Motion in Opposition to LG Chem's Motion for Relief from Non- Dispositive Pretrial Order of Magistrate Judge for SES and reviewed law used in motion with my research of the issue.	0.5	400	\$200.00	L210	CLC
10/8/2015	Read and reviewed subpoena for Tocad America in preparation for call with David Ross, counsel for Tocad.	0.5	400	\$200.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/8/2015	Attended call with SES and David Ross, counsel for Tocad America, regarding discovery requests.	0.2	400	\$80.00	L390	CLC
10/8/2015	Updated third party chart.	0.5	250	\$125.00	L120	JSD
10/8/2015	Preparing Kazunari Takeshima depo memo by running targeted searches on latest NEC production; Printing and reviewing Takanao Matsumoto (Sanyo) depo memo for meeting, revising depo memo; Meeting with Ivy re Matsumoto deposition; Sending additional depo materials and answering questions from Ivy re Matsumoto.	8	125	\$1,000.00	L140	AE
10/8/2015	Attn. depo preparation.	2.5	700	\$1,750.00	L330	JDF
10/8/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/8/2015	Downloaded PCT translation documents of TSB-LIB, SANYO, PANA, and S-DOJ from LCHB. Renamed PCT translation documents and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
10/8/2015	Update case file; update case file.	0.7	250	\$175.00	L140	BRM
10/8/2015	Prepare for and conduct discovery conference with Tocad re non-party subpoena. Draft summary of conversation for file.	0.5	600	\$300.00	L390	SES
10/8/2015	Edit and research opposition to LG Chem defendants' motion for relief from Non-Dispositive Pretrial Order of Magistrate Judge (Kwak). Circulate to co- leads.	5.2	600	\$3,120.00	L210	SES
10/9/2015	Translation review of LiB document.	7	350	\$2,450.00	L140	JC
10/9/2015	Research and drafted memorandum re " the second se	1.3	400	\$520.00	L210	CLC
10/9/2015	Proofed, fact-checked and autocited opposition to motion for relief from non- dispositive pretrial order re Kwak; prepared sealing motions; redact brief, efiled the same and prepared courtesy copy for delivery to the court.	5.5	250	\$1,375.00	L210	JSD
10/9/2015	Updating Takeshima background memo, reviewing and sending updated Takeshima memos; Reviewing Takanao Matsumoto documents, running misc. searches, coding and sending Hot Sony doc; Searching for and coding Panasonic roadmaps.	5	125	\$625.00	L140	AE
10/9/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/9/2015	Downloaded PCT translation documents of LGC-MDL, SANYO-C, PANA-C, and S-DOJ from LCHB. Renamed PCT translation documents and saved in the Batteries shared folder; Updated LIB new production documents of	0.7	150	\$105.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	HML-P, Sanyo, SNA, and Sony Bates ranges on the Assignment Master List.					
10/9/2015	Update case file; process document productions.	0.9	250	\$225.00	L140	BRM
	Edit and research opposition to LG Chem defendants' motion for relief from					
10/9/2015	Non-Dispositive Pretrial Order of Magistrate Judge (Kwak). Oversaw filing	5	600	\$3,000.00	L210	SES
	of same.			.		
10/9/2015	Conference call with S. Scarlett re status of Matsumoto deposition.	0.1	575	\$57.50	L330	IAT
10/12/2015	Searching for and coding Panasonic roadmaps.	8	125	\$1,000.00	L140	AE
10/12/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/10/0015	Updated LIB new production documents of LG Chem and NEC Bates ranges	0.5	150	ф 75 .00	T 1 40	CI
10/12/2015	on the Assignment Master List; Put LIB new production documents of LG	0.5	150	\$75.00	L140	CL
10/12/2015	Chem and NEC into the right Collections. Update case file.	0.5	250	\$125.00	L140	BRM
10/12/2015	Review Fukai deposition transcript re preparation for Matsumoto deposition.	2.3	575	\$1,322.50	L330	IAT
	Analyze hot documents, A. Sheanin draft depo outline, and draft					
10/12/2015	supplemental questions re Matsumoto deposition.	6.3	575	\$3,622.50	L330	IAT
10/13/2015	Calendared deposition dates.	0.7	250	\$175.00	L120	JSD
10/13/2015	Attended to attorneys' requests and inquiries re video streaming and depo exhibits.	0.6	250	\$150.00	L120	JSD
10/13/2015	Communicated with VT class rep re documents that needed to be filled up and signed and qualifying purchases, and answered questions re documents.	0.7	250	\$175.00	L120	JSD
10/13/2015	Searching for and coding Panasonic roadmaps.	8	125	\$1,000.00	L140	AE
10/13/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/13/2015	Saved LIB Matsumoto CT documents in the Batteries shared folder and sent to Shana; Sent the LIB link of Master translations and Exhibits shared folder to Ivy.	0.2	150	\$30.00	L140	CL
10/13/2015	Process document productions; update case file.	0.8	250	\$200.00	L140	BRM
10/13/2015	Analyze Fukai deposition transcript, hot documents, and Deposition Protocol re preparation Matsumoto deposition.	1.8	575	\$1,035.00	L330	IAT
10/13/2015	Analyze draft Matsumoto deposition outline and potential exhibits.	1.9	575	\$1,092.50	L330	IAT
10/13/2015	Conference call with A. Sheanin re preparation for Matsumoto deposition.	0.3	575	\$172.50	L330	IAT
10/14/2015	Updated third party chart.	0.5	250	\$125.00	L120	JSD
10/14/2015	Calendared due dates.	0.3	250	\$75.00	L120	JSD
10/14/2015	Searching for and coding Panasonic roadmaps.	8	125	\$1,000.00	L140	AE
10/14/2015	Review and search documents in LGC productions at request of IPP experts.	5	125	\$625.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/14/2015	Downloaded LIB CT translation documents of S-DOJ, SANYO, and PANA from LCHB and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
10/14/2015	Draft summary notes re Matsumoto deposition day 1.	1.3	575	\$747.50	L330	IAT
10/14/2015	Attend deposition of Matsumoto.	10.3	575	\$5,922.50	L330	IAT
10/15/2015	Searching for and coding Panasonic roadmaps. Searching for and coding Panasonic documents	8	125	\$1,000.00	L140	AE
10/15/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/15/2015	Downloaded CT translation documents of S-DOJ, SANYO, and PANA from LCHB and saved in the Batteries shared folder.	0.3	150	\$45.00	L140	CL
10/15/2015	Process document productions.	0.9	250	\$225.00	L140	BRM
10/15/2015	Draft summary notes re Matsumoto deposition.	0.6	575	\$345.00	L330	IAT
10/15/2015	Attend deposition of Matsumoto.	11.4	575	\$6,555.00	L330	IAT
10/16/2015	Downloaded exhibits, updated master deposition exhibits, standardized naming conventions for exhibits.	3.5	250	\$875.00	L120	JSD
10/16/2015	Updated third party chart.	0.6	250	\$150.00	L120	JSD
10/16/2015	Searching for and coding Panasonic documents involving	8	125	\$1,000.00	L140	AE
10/16/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/16/2015	Updated LIB new production documents of PANA-C, Sanyo, Sony and HML-P Bates ranges on the Assignment Master List; Put LIB new production documents of PANA-C, Sanyo, Sony and HML-P into the right Collections.	1.5	150	\$225.00	L140	CL
10/16/2015	Process document productions.	0.6	250	\$150.00	L140	BRM
10/19/2015	Team meeting.	0.1	350	\$35.00	L140	JC
10/19/2015	Searching for and coding Panasonic documents involving Weekly Batteries meeting.	5	125	\$625.00	L140	AE
10/19/2015	Review and search documents in LGC productions at request of IPP experts.	7.5	125	\$937.50	L140	JWJ
10/19/2015	Downloaded LIB CT translation documents of LGC-MDL, PANA from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/19/2015	Process document productions.	0.8	250	\$200.00	L140	BRM
10/19/2015	Prepare for and conduct call with Jabil re non-party subpoena.	0.5	600	\$300.00	L311	SES
10/19/2015	Call with co-leads on upcoming depositions and strategy for class certification.	0.5	600	\$300.00	L120	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/19/2015	Review documents and select exhibits for deposition of Andrew Chung (LG Chem).	4.5	600	\$2,700.00	L330	SES
10/19/2015	Draft deposition summary memo re Matsumoto.	1.9	575	\$1,092.50	L330	IAT
10/20/2015	Prepared amended notice of deposition for Donny Lee and Andrew Chung and served the same.	1.5	250	\$375.00	L311	JSD
10/20/2015	Updated third party chart.	0.2	250	\$50.00	L120	JSD
10/20/2015	Searching for and coding Panasonic documents involving	6.2	125	\$775.00	L140	AE
10/21/2015	Downloaded depo exhibits, standardized naming conventions, and updated master depo chart.	1.5	250	\$375.00	L120	JSD
10/21/2015	Zipped third party productions and served to defense counsel.	1.5	250	\$375.00	L140	JSD
10/21/2015	Searching for and coding Panasonic battery model sales records.	7	125	\$875.00	L140	AE
10/21/2015	Updated LIB new production documents of SANYO and PANA Bates ranges on the Assignment Master List; Put LIB new production documents of SANYO and PANA into the right Collections.	0.5	150	\$75.00	L140	CL
10/21/2015	Review documents and select exhibits for deposition of Andrew Chung (LG Chem).	0.8	600	\$480.00	L330	SES
10/22/2015	Reviewed subpoenas in preparation for meetings with third parties.	0.6	400	\$240.00	L311	CLC
10/22/2015	Conducted legal research on motion for sanctions against Kwak from LG Chem in preparation for filing motion to court.	3.3	400	\$1,320.00	L210	CLC
10/22/2015	Conducted legal research for SES regarding motion for sanctions for failure to appear at deposition relating to Kwak (LGC witness).	4.4	400	\$1,760.00	L210	CLC
10/22/2015	Conducted legal research for SES regarding standard of law for Kwak motion for sanctions.	0.5	400	\$200.00	L210	CLC
10/22/2015	Meeting with JF regarding strategizing for research assignment for sanctions motion for Kwak.	0.2	400	\$80.00	L210	CLC
10/22/2015	Conducted legal research on applicable sanctions for Kwak of LG Chem in preparation for filing of motion for sanctions against Kwak for failure to appear for deposition.	2.5	400	\$1,000.00	L210	CLC
10/22/2015	Reviewed subpoenas in preparation for meetings with third parties with regards to IPPs' discovery request.	0.4	400	\$160.00	L210	CLC
10/22/2015	Downloaded defendants document production and saved the same in the system.	2	250	\$500.00	L140	JSD
10/22/2015	Formatted amended depo notices and served the same.	1.2	250	\$300.00	L311	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/22/2015	Running Fumitsugu Tachihara (Sanyo) hot doc search.	0.3	125	\$37.50	L140	AE
10/22/2015	Attn. discovery and motions.	2.5	700	\$1,750.00	L210	JDF
10/22/2015	Downloaded CT translation documents of PANA and LGC-MDL from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/22/2015	Call with co-leads on discovery and status of settlement negotiations.	0.5	600	\$300.00	L120	SES
10/22/2015	Calls with co-lead counsel (Saveri & Pearson Simon) re order from Judge Gonzalez Rogers regarding supplemental briefing for Kwak sanctions.	0.8	600	\$480.00	L120	SES
10/22/2015	Research and draft response to order from Judge Gonzalez Rogers regarding supplemental briefing for Kwak sanctions.	4	600	\$2,400.00	L210	SES
10/23/2015	Answer to Senior Partner's question re LG Chem deponent SH Kwak.	0.2	350	\$70.00	L140	JC
10/23/2015	Met with defendants and DAPs to discuss discovery issues.	0.5	400	\$200.00	L312	CLC
10/23/2015	Conducted legal research for SES regarding standard of law for Kwak motion for sanctions.	3.2	400	\$1,280.00	L210	CLC
10/23/2015	Incorporated portions of law from legal research on sanctions into motion for sanctions against Kwak in preparation for submission to court.	1.5	400	\$600.00	L210	CLC
10/23/2015	Prepared notes from legal research and reviewed relevant legal research in preparation for meeting with JF and SES on legal standards for motion for sanctions against Kwak.	0.2	400	\$80.00	L210	CLC
10/23/2015	Prepared outline of standards of law for SES in preparation for submitting motion for sanctions to court.	1.5	400	\$600.00	L210	CLC
10/23/2015	Coding hot Tachihara (Sanyo) doc and sending to Hisun.	1	125	\$125.00	L140	AE
10/23/2015	Attn. discovery/document review.	1.5	700	\$1,050.00	L140	JDF
10/23/2015	Updated LIB new production documents of SDI-B Bates ranges on the Assignment Master List; Put LIB new production documents of SDI-B into the right Collections; Downloaded CT translation documents of PANA and LGC-MDL from LCHB and saved in the Batteries shared folder.	0.7	150	\$105.00	L140	CL
10/23/2015	Call with A. Sheanin re protective order issue and NEC-Tokin claw back.	0.3	600	\$180.00	L120	SES
10/23/2015	Research and draft response to order from Judge Gonzalez Rogers regarding supplemental briefing for Kwak sanctions.	5.1	600	\$3,060.00	L210	SES
10/23/2015	Call with LG Chem on expense reports for Lee and Chung; hard copy documents, privilege log issues. Follow up call with co-lead counsel re joint letter brief to court.	0.5	600	\$300.00	L390	SES
10/26/2015	Updated third party chart.	0.5	250	\$125.00	L120	JSD
10/26/2015	Prepared notice and document production subpoena to third parties.	0.8	250	\$200.00	L311	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/26/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	0.5	125	\$62.50	L140	AE
10/26/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/26/2015	Downloaded CT translation documents of LGC-MDL and S-DOJ from LCHB and saved in the Batteries shared folder; Downloaded CT translation documents of TSB-LIB, PANA-C, NECT, LGC-MDL and saved in the Batteries shared folder; Compressed PCT translation documents of Matsumoto deposition and sent to Shana via Hightail.	0.5	150	\$75.00	L140	CL
10/26/2015	Process document productions; update case file; Update case file.	2.6	250	\$650.00	L140	BRM
10/26/2015	Analyze 3d party subpoena chart and follow-up status.	1.4	575	\$805.00	L390	IAT
10/27/2015	Updated notice and document production subpoenas to third parties, and served the same.	1.5	250	\$375.00	L311	JSD
10/27/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	6	125	\$750.00	L140	AE
10/27/2015	Attn. discovery and deposition preparation.	2.2	700	\$1,540.00	L330	JDF
10/27/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/27/2015	Updated LIB new production documents of MAX-P Bates ranges on the Assignment Master List; Put LIB new production documents of MAX-P into the right Collections.	0.2	150	\$30.00	L140	CL
10/27/2015	Update case file; review document productions for possible gaps.	1.2	250	\$300.00	L140	BRM
10/28/2015	Answer to Senior Partner's question re LG Chem deponent YW Chung.	0.5	350	\$175.00	L140	JC
10/28/2015	Prepared motion to amend; formatted draft fourth amended complaint.	4	250	\$1,000.00	L210	JSD
10/28/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	8.2	125	\$1,025.00	L140	AE
10/28/2015	Call with defense counsel re discovery.	1.5	700	\$1,050.00	L390	JDF
10/28/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/28/2015	Download and organize direct purchaser hot document collections; update case file.	1.5	250	\$375.00	L140	BRM
10/29/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	8	125	\$1,000.00	L140	AE
10/29/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
10/29/2015	Updated LIB new production documents of LGC-MDS and NEC Bates ranges on the Assignment Master List; Put LIB new production documents of LGC-MDL and NEC into the right Collections.	0.4	150	\$60.00	L140	CL
10/29/2015	Edit plaintiffs' insert to joint letter moving to compel adequate privilege log from LG Chem.	1	600	\$600.00	L210	SES
10/29/2015	Analyze 3d party subpoena chart and Battery Pack status and voice message.	0.5	575	\$287.50	L390	IAT

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/30/2015	Downloaded exhibits, conformed all exhibits to a unified naming convention; updated master depo exhibit chart.	2	250	\$500.00	L120	JSD
10/30/2015	Calendared due dates.	0.3	250	\$75.00	L120	JSD
10/30/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	7.8	125	\$975.00	L140	AE
10/30/2015	Review and search documents in LGC productions at request of IPP experts.	4	125	\$500.00	L140	JWJ
10/30/2015	Downloaded CT translation documents of LGC-MDL, NEC and PANA from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/30/2015	Process document productions.	0.9	250	\$225.00	L140	BRM
11/1/2015	Prepare for deposition of Andrew Chung (LG Chem); review documents and select exhibits.	1	600	\$600.00	L330	SES
11/2/2015	Communicated with class reps to secure their verification to the supplemental objections and responses to the second set of interrogatories.	0.8	250	\$200.00	L312	JSD
11/2/2015	Prepared Amended Notice of Deposition.	0.6	250	\$150.00	L311	JSD
11/2/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	8	125	\$1,000.00	L140	AE
11/2/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/2/2015	Checked and sent PCT translation documents of YW Chung to Shana and Brian; Downloaded YW Chung documents from Catalyst and sent to Shinae for translation; Downloaded CT translation documents of LGC-MDL, NEC and PANA from LCHB and saved in the Batteries shared folder.	2.8	150	\$420.00	L140	CL
11/2/2015	Assist with deposition preparations.	2.2	250	\$550.00	L330	BRM
11/3/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents; Searching for Fumitsugu Tachihara (Sanyo) org charts and putting together a background memo; Searching for Fumitsugu Tachihara (Sanyo) hot documents.	7.8	125	\$975.00	L140	AE
11/3/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/3/2015	Downloaded CT translation documents of PANA, LGC-MDL, and NEC from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/3/2015	Process document productions; update case file.	0.9	250	\$225.00	L140	BRM
11/3/2015	Call with LG Chem regarding text messages, phone records and @popmail error for D. Lee documents.	0.5	600	\$300.00	L390	SES
11/4/2015	Reviewed Plaintiffs' Motion to Substitute, Defenses' opposition, and Plaintiffs' response as well as example motions to amend in preparation for writing plaintiffs' Motion to Amend.	3.4	400	\$1,360.00	L210	CLC
11/4/2015	Reviewed depositions for class reps in order to verify purchases.	0.5	400	\$200.00	L140	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/4/2015	Researched bankruptcy proceeding of third party to determine the bankruptcy plan as determined by the court to determine whether third party no longer has to comply with plaintiffs' request for production.	2.3	400	\$920.00	L390	CLC
11/4/2015	Formatted motion to amend complaint, and prepared a draft of the new amended complaint.	2.5	250	\$625.00	L210	JSD
11/4/2015	Assisted attorney in researching third party Moltech's bankruptcy proceedings.	1	250	\$250.00	L110	JSD
11/4/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents; Searching for Kazunari Takeshima (NEC) hot documents.	8	125	\$1,000.00	L140	AE
11/4/2015	Call with co counsel ; attn discovery.	3.5	700	\$2,450.00	L390	JDF
11/4/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/4/2015	Updated LIB new production documents of SNA, NEC, PANA-C, PNA, SANYO-C, SANYO, SNA, and TSB-LIB Bates ranges on the Assignment Master List; Put LIB new production documents of SNA, NEC, PANA-C, PNA, SANYO-C, SANYO, SNA, and TSB-LIB into the right Collections.	0.5	150	\$75.00	L140	CL
11/5/2015	Review of LiB documents for Andrew Chung deposition.	8.5	350	\$2,975.00	L140	JC
11/5/2015	Prepared client questionnaire, R&R, preservation letter and attachment A to the protective order for signature and filling up of the proposed new class representative.	2	250	\$500.00	L110	JSD
11/5/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	4.8	125	\$600.00	L140	AE
11/5/2015	Expert analysis discussion.	2.5	700	\$1,750.00	L130	JDF
11/5/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/5/2015	Co-lead call re motion practice, discovery and settlement issues.	0.5	600	\$300.00	L120	SES
11/6/2015	Search for hot documents for Andrew Chung deposition; Answers to senior partner's question re. LG Chem popmail problem.	5	350	\$1,750.00	L140	JC
11/6/2015	Calendared due dates/depo dates.	0.6	250	\$150.00	L120	JSD
11/6/2015	Updated third party meet and confer chart.	0.7	250	\$175.00	L120	JSD
11/6/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents.	3	125	\$375.00	L140	AE
11/6/2015	Depo preparation.	4.5	700	\$3,150.00	L330	JDF
11/6/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/6/2015	Coordinate with co-counsel regarding inadvertently produced document; process document productions; update case file.	1.7	250	\$425.00	L140	BRM
11/9/2015	Revisit to review LG Chem popmail problem at senior partner's request; team meeting.	4.1	350	\$1,435.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/9/2015	Searching for Fumitsugu Tachihara (Sanyo) hot documents; Weekly LiB meeting with Shana.	2	125	\$250.00	L140	AE
11/9/2015	Sent a PCT doc of LGC-MDL to Shana. Downloaded CT translation documents of S-DOJ, TSB-LIB and LGC-MDL from LCHB and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
11/9/2015	Prepare for and attend call with all defense counsel regarding protective order and claw back requests.	0.5	600	\$300.00	L390	SES
11/9/2015	Call with NEC and Aopen regarding non-party subpoena.	0.2	600	\$120.00	L390	SES
11/10/2015	Downloaded third party document productions and transmitted to the experts.	1.5	250	\$375.00	L140	JSD
11/10/2015	Call with expert.	1.2	700	\$840.00	L130	JDF
11/10/2015	Review and search documents in LGC productions at request of IPP experts.	5	125	\$625.00	L140	JWJ
11/10/2015	Downloaded CT translation documents of PANA, LGC-MDL, and NEC from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/10/2015	Process document productions.	0.8	250	\$200.00	L140	BRM
11/11/2015	Attn. discovery meet and confer.	2.2	700	\$1,540.00	L390	JDF
11/11/2015	Update case file.	0.9	250	\$225.00	L120	BRM
11/11/2015	Call with co-lead counsel on assignments, class certification and case status.	0.5	600	\$300.00	L120	SES
11/12/2015	Prepared Apple/HP/Dell data documents and transmitted to co-counsel.	1	250	\$250.00	L140	JSD
11/12/2015	Coding Fumitsugu Tachihara (Sanyo) hot documents; Searching for and coding BAJ meeting minutes.	7.5	125	\$937.50	L140	AE
11/12/2015	Tachihara depo prep - Review of Chinese documents; Search online for the venue the parties visited.	1.5	350	\$525.00	L140	HH
11/12/2015	Review and search documents in LGC productions at request of IPP experts.	7	125	\$875.00	L140	JWJ
11/12/2015	Pulled out LIB PCT translation, original, and English documents for Lee deposition and sent to Shana; Created the PCTs list that sent to the expert.	2.5	150	\$375.00	L140	CL
11/13/2015	Making interim chart for Andrew Chung deposition.	0.7	350	\$245.00	L140	JC
11/13/2015	Prepared for M+C by reviewing correspondence between defense counsel and co-leads on producing documents and privilege logs and took notes on issues.	0.4	400	\$160.00	L210	CLC
11/13/2015	Attended Meet and Confer to discuss defendants producing documents and privilege logs and establishing timeline for production.	0.6	400	\$240.00	L390	CLC
11/13/2015	Searching for and coding BAJ meeting minutes.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/13/2015	Code documents: SANYO-C000100218, SANYO0553033, SANYO0553094; Translate doc: SANYO-C000100218.	1.3	350	\$455.00	L140	HH
11/13/2015	Review and search documents in LGC productions at request of IPP experts.	7	125	\$875.00	L140	JWJ
11/13/2015	Updated LIB new production documents of MAX-P Bates ranges on the Assignment Master List; Put LIB new production documents of MAX-P into the right Collections.	0.5	150	\$75.00	L140	CL
11/13/2015	Process document productions; update case file.	1	250	\$250.00	L140	BRM
11/13/2015	Attend deposition of Dong Woo (Donny) Lee of LG Chem.	4	600	\$2,400.00	L330	SES
11/13/2015	Analyze 3rd party subpoena chart.	0.5	575	\$287.50	L311	IAT
11/16/2015	Search on and review Andrew Chung documents (LG Chem deponent) in preparation for deposition.	8.4	350	\$2,940.00	L140	JC
11/16/2015	Downloaded exhibits and set up master repository folder and renamed exhibit according to a unified convention.	1.5	250	\$375.00	L120	JSD
11/16/2015	Running targeted searches for hot BAJ meeting minutes. Searching for and coding BAJ meeting minutes; Coding Fumitsugu Tachihara (Sanyo) doc; Running targeted Fumitsugu Tachihara (Sanyo) searches, coding and sending hot documents.	8.2	125	\$1,025.00	L140	AE
11/16/2015	Review and translate SANYO0553214 per Hisun Rim.	0.4	350	\$140.00	L140	HH
11/16/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/16/2015	Updated LIB new production documents of Sanyo, SNA, Pana, PNA, MAX- P, and HML-P Bates ranges on the Assignment Master List; Put LIB new production documents of Sanyo, SNA, Pana, PNA, MAX-P, and HML-P into the right Collections.	1	150	\$150.00	L140	CL
11/16/2015	Process document productions; update case file; assist with deposition preparations.	1.9	250	\$475.00	L330	BRM
11/17/2015	Search on and review phone records for competitor contacts.	8.7	350	\$3,045.00	L140	JC
11/17/2015	Running targeted Fumitsugu Tachihara (Sanyo) searches, coding and sending hot documents.	7.8	125	\$975.00	L140	AE
11/17/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/17/2015	Sent LIB Matsumoto PCT documents for Experts via Hightail to Brian; Pulled out LIB Hitachi Product List for Spec documents and sent to Brian; Downloaded CT translation documents of PANA, LGC-MDL, and NEC from LCHB. Renamed and saved in the Batteries shared folder.	2.5	150	\$375.00	L140	CL
11/17/2015	Compile documents for attorney review regarding deposition preparation.	3.7	250	\$925.00	L330	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/18/2015	Work on write-up and coding of phone records; Run a search on Andrew Chung documents for his deposition.	8.5	350	\$2,975.00	L140	JC
11/18/2015	Reviewed previous correspondence and protective orders and crafted email to Blackberry and SDI requesting that IPPs be included in negotiations over any protective order governing production.	0.5	400	\$200.00	L120	CLC
11/18/2015	Converted Pdf to Word and prepared redline comparison of protective orders as per instruction.	2.5	250	\$625.00	L210	JSD
11/18/2015	Formatted and proofed letter re Home Depo data questions.	1	250	\$250.00	L311	JSD
11/18/2015	Running targeted Fumitsugu Tachihara (Sanyo) searches, coding and sending hot documents; Running targeted searches for hot BAJ meeting minutes. Searching for and coding BAJ meeting minutes; Running targeted Kazunari Takeshima (NEC Tokin) searches, coding and sending hot documents.	8	125	\$1,000.00	L140	AE
11/18/2015	Co-counsel call.	1	700	\$700.00	L120	JDF
11/18/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/18/2015	Pulled out LIB documents of PANA Expert Data Supply Reports for Brian; Downloaded CT translation documents of PANA, LGC-MDL, and NEC from LCHB. Renamed and saved in the Batteries shared folder.	4	150	\$600.00	L140	CL
11/18/2015	Check status of translations for upcoming depositions; organization of materials for attorney review; process document productions; assist experts with document requests.	4.2	250	\$1,050.00	L330	BRM
11/18/2015	Prepare for and conduct discovery conference with LG Chem on telephone records, expense reports, hard copy documents, interrogatory responses, privilege logs, and inadequate productions from certain custodians. Call with DPPs re same.	2	600	\$1,200.00	L390	SES
11/19/2015	Search on and review Andrew Chung documents (LG Chem deponent) in preparation for deposition.	8.5	350	\$2,975.00	L140	JC
11/19/2015	Drafted Fourth Amended Complaint by dropping and substituting class representatives and dropping governmental class, expect for California.	1.2	400	\$480.00	L210	CLC
11/19/2015	Communicated with JD and co-leads to determine status of class reps in preparation for drafting motion to amend.	0.5	400	\$200.00	L110	CLC
11/19/2015	Reviewed most recent LIB complaint and motion to substitute in preparation for drafting motion to amend.	1.3	400	\$520.00	L210	CLC
11/19/2015	Proofed, quote- and fact checked motion to amend complaint.	1.5	250	\$375.00	L210	JSD
11/19/2015	Prepared redline comparison of the operative complaint.	1	250	\$250.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/19/2015	Running targeted Kazunari Takeshima (NEC Tokin) searches, coding and sending hot documents.	8	125	\$1,000.00	L140	AE
11/19/2015	Attn expert report work.	3.5	700	\$2,450.00	L130	JDF
11/19/2015	Review translation and provide edits to SANYO0552987.	0.8	350	\$280.00	L140	HH
11/19/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/19/2015	Pulled out LIB documents of PANA Expert Data Supply Reports and sent to Brian; Updated LIB new production documents of PANA-C Bates ranges on the Assignment Master List; Put LIB new production documents of PANA-C into the right Collections.	3	150	\$450.00	L140	CL
11/19/2015	Update case file; assist experts with document requests; process document productions; review status of translations regarding upcoming depositions.	3.5	250	\$875.00	L140	BRM
11/20/2015	Search on and review Andrew Chung documents (LG Chem deponent) in preparation for deposition.	8.5	350	\$2,975.00	L140	JC
11/20/2015	Compared outline and motion to substitute with amended complaint and edited outline to include relevant case law on issue based on examples of motion to amend.	2	400	\$800.00	L210	CLC
11/20/2015	Outlined issues from IPPs' previous motion to remove and substitute and IPPs' reply in preparation for drafting motion to amend.	1.5	400	\$600.00	L210	CLC
11/20/2015	Reviewed examples sent by SES of motions to amend, oppositions, and reply in preparation for drafting motion to amend as well as IPPs' previous motion to remove and substitute on issue.	2.3	400	\$920.00	L210	CLC
11/20/2015	Formatted and proofed data questionnaire letter to Dell and Amazon and served the same.	2	250	\$500.00	L311	JSD
11/20/2015	Running targeted Kazunari Takeshima (NEC Tokin) searches, coding and sending hot documents; Fully coding Sanyo and NEC documents chosen by DPPs for the exhibit.	7.8	125	\$975.00	L140	AE
11/20/2015	Edit requests and analyze discovery issues.	3.5	700	\$2,450.00	L140	JDF
11/20/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/20/2015	Downloaded LIB CT translation documents of HML-P, LGC-MDL, MAX-P, PANA-C, P-DOJ and SANYO from LCHB. Renamed and saved in the Batteries shared folder. Also collected some of Sumoto and Tachihara final translation documents for Experts.	0.5	150	\$75.00	L140	CL
11/20/2015	Correspond with experts regarding pass-through data. Send follow up questions on data to third parties Dell, Amazon, Microsoft (Nokia).	0.5	600	\$300.00	L130	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/22/2015	Review translation and provide edits to SONY-LIB-000724426.	0.3	350	\$105.00	L140	HH
11/23/2015	Search on and review Andrew Chung documents (LG Chem deponent) in preparation for deposition.	9	350	\$3,150.00	L140	JC
11/23/2015	Incorporated changes to status of class representatives to amended complaint and outline in preparation for motion to amend and sending redlined complaint to defendants.	1.2	400	\$480.00	L210	CLC
11/23/2015	Searched for and reviewed communications from co-leads in order to clarify status of class representatives in preparation for sending redlined version of fourth amended complaint to defendants.	0.6	400	\$240.00	L110	CLC
11/23/2015	Drafted letter to defense counsel regarding redlined Fourth Amended Complaint.	0.5	400	\$200.00	L120	CLC
11/23/2015	Communicated with co-leads and reviewed correspondences in order to obtain up-to-date information on class rep purchases to make amendments to complaint in preparation to send to defendants.	0.6	400	\$240.00	L110	CLC
11/23/2015	Reviewed and took notes on hearing transcript regarding substituting class representatives in preparation for understanding issues and writing motion to amend.	1.2	400	\$480.00	L210	CLC
11/23/2015	Communicated with co-leads and class representatives in order to make sure that IPPs had all relevant and up-to-date class representative information so that IPPs knew which class reps to drop and to substitute in preparation for serving defendants with redlined amended complaint.	0.3	400	\$120.00	L110	CLC
11/23/2015	Fully coding Fumitsugu Tachihara (Sanyo) hot documents; Searching for Kazunari Takeshima (NEC Tokin) expense reports; Searching for Fumitsugu Tachihara (Sanyo) CVs.	8	125	\$1,000.00	L140	AE
11/23/2015	Review and translate SANYO0553087; Translation requests from Amy re: Sanyo documents.	1	350	\$350.00	L140	HH
11/23/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/23/2015	Saved full rough translation documents of PANA in the Batteries shared folder; Downloaded PCT final translation documents of HML-P, MAX-P, PANA-C, and SANYO-C from LCHB and saved in the Batteries shared folder; Collected Sumoto PCT documents of HML-P and MAX-P for experts.	0.2	150	\$30.00	L140	CL
11/24/2015	Search and review documents in preparation for Andrew Chung documents for deposition; Translation review for Andrew Chung deposition.	8.5	350	\$2,975.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/24/2015	Drafted motion to amend based on outline of law and facts from transcript in preparation for filing if defendants do not agree to IPPs' amendments to complaint.	1.6	400	\$640.00	L210	CLC
11/24/2015	Read and reviewed law from examples of motion to amend sent by SES and incorporated relevant portions into outline in preparation for drafting motion to amend.	2.4	400	\$960.00	L210	CLC
11/24/2015	Reviewed portions of transcript of class rep substitution issues and incorporated portions into outline in preparation for drafting motion to amend.	0.6	400	\$240.00	L210	CLC
11/24/2015	Reviewed IPPs' previous motion to substitute, defendants' opposition, and IPPs' reply as well as examples of motions to amend sent by SES in preparation for drafting motion to amend.	2.2	400	\$880.00	L210	CLC
11/24/2015	Answering questions about various Fumitsugu Tachihara (Sanyo) and Kazunari Takeshima (NEC Tokin) documents; Searching for BAJ meeting minutes; Searching for and coding uncoded Kazunari Takeshima (NEC Tokin) org charts; Searching for Fumitsugu Tachihara (Sanyo) CVs; Fully coding Kazunari Takeshima (NEC Tokin) hot documents cited in exhibits.	8	125	\$1,000.00	L140	AE
11/24/2015	Translation requests from Amy re: Sanyo documents.	0.3	350	\$105.00	L140	HH
11/24/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
11/24/2015	Renamed all final translation documents in the Batteries shared folder; Downloaded PCT final translation documents of P-DOJ, S-DOJ, TSB-LIB, HML-P, PANA-C, SANYO-C, and LGC-MDL from LCHB and saved in the Batteries shared folder; Collected Sumoto PCT documents of P-DOJ, S-DOJ, SANYO-C, and HML-P for experts.	2.5	150	\$375.00	L140	CL
11/24/2015	Process document productions; update case file; organize documents for expert review.	2.1	250	\$525.00	L140	BRM
11/25/2015	Search and review documents in preparation for Andrew Chung documents for deposition; Translation review for Andrew Chung deposition.	7.1	350	\$2,485.00	L140	JC
11/25/2015	Reviewed letter from defense counsel regarding issue of prejudice and substituting class reps in preparation for determining whether to file motion to amend.	0.5	400	\$200.00	L210	CLC
11/25/2015	Incorporated edits from co-leads into motion to amend as well as cite- checked with blue booking format and reviewed for grammar in preparation for sending to co-leads.	1.3	400	\$520.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/25/2015	Incorporated SES's edits and researched/worked on issue of prejudice in order to provide a better version of motion to co-leads.	3.5	400	\$1,400.00	L210	CLC
11/25/2015	Communicated with co-leads and class reps in order to verify status of purchases in preparation for including information in motion to amend and amended complaint.	0.5	400	\$200.00	L110	CLC
11/25/2015	Searching for and coding BAJ meeting minutes.	4.8	125	\$600.00	L140	AE
11/25/2015	Review and search documents in LGC productions at request of IPP experts.	5	125	\$625.00	L140	JWJ
11/25/2015	Edit motion to amend complaint with substitution of class representatives.	1	600	\$600.00	L210	SES
11/28/2015	Review 13 draft translations for the Sumoto deposition.	4.5	350	\$1,575.00	L140	HH
11/30/2015	Search on and review Andrew Chung documents (LG Chem deponent) in preparation for deposition.	8.5	350	\$2,975.00	L140	JC
11/30/2015	Prepared Motion to Amend Complaint for filing by correcting formatting issues and prepared other documents for filing with JD.	3.2	400	\$1,280.00	L210	CLC
11/30/2015	Proofed, fact-checked and quote-checked motion to amend complaint, and proposed complaint; prepared proposed order; arranged attachments, and efiled the same.	6	250	\$1,500.00	L210	JSD
11/30/2015	Searching for and coding BAJ meeting minutes; Weekly Battery meeting.	8	125	\$1,000.00	L140	AE
11/30/2015	Edit requests and analyze discovery issues.	2.7	700	\$1,890.00	L140	JDF
11/30/2015	LIB LGC document search for experts; team meeting led by Shana Scarlett.	8	125	\$1,000.00	L140	JWJ
11/30/2015	Downloaded the PCT final translation documents for Sumoto and Tachihara from LCHB; Renamed and saved the PCT translation documents in the Batteries shared folder; Collected Sumoto and Tachihara PCT documents for experts; Meeting.	3.5	150	\$525.00	L140	CL
11/30/2015	Assist with preparation and filing of motion for leave to amend complaint.	1.2	250	\$300.00	L210	BRM
11/30/2015	Edit and assist in filing of motion to amend the complaint and filing of proposed fourth amended complaint. Communicate with co-lead counsel re same.	2	600	\$1,200.00	L210	SES
11/30/2015	Prepare for and conduct discovery conference with counsel for non-party Palladium.	0.5	600	\$300.00	L390	SES
12/1/2015	Targeted search for Andrew Chung documents for deposition.	9	350	\$3,150.00	L140	JC
12/1/2015	Reformatted complaint caption page and distributed for co-leads' approval in order to solve formatting and spacing issues on motion to amend.	0.2	400	\$80.00	L210	CLC
12/1/2015	Met with co-leads and D4 to discuss future steps for data searches of plaintiffs' data that was collected.	0.3	400	\$120.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/1/2015	Fully coding Sony and Sanyo documents indicated by Hisun; Searching for and coding BAJ meeting minutes.	8	125	\$1,000.00	L140	AE
12/1/2015	Update case file; assist experts regarding third-party data productions; review status of third-party subpoena productions; assist with deposition preparations.	3.1	250	\$775.00	L140	BRM
12/1/2015	Call with J. Zahid of Zelle Hoffman re subpoenas to non-parties and production status.	0.2	600	\$120.00	L390	SES
12/2/2015	Targeted search for Andrew Chung documents for deposition.	8.5	350	\$2,975.00	L140	JC
12/2/2015	Worked with JD to prepare motion to re-notice the motion to amend and communicated with co-leads to obtain their approval of our drafted motion.	0.5	400	\$200.00	L210	CLC
12/2/2015	Drafted amended notice of motion to amend before Judge Gonzalez Rogers, changing time and place.	0.3	400	\$120.00	L210	CLC
12/2/2015	Fully coding Kazunari Takeshima (NEC Tokin) documents; Reviewing Kazunari Takeshima (NEC Tokin) and SDI search.	5.3	125	\$662.50	L140	AE
12/2/2015	Pulled out the Panasonic supply reports documents and sent to Shana and Brian; Downloaded the PCT final translation documents for Sumoto and Tachihara from LCHB; Renamed and saved the PCT translation documents in the Batteries shared folder; Sent complete sets of Sumoto and Tachihara PCT documents to Shana.	2.5	150	\$375.00	L140	CL
12/2/2015	Assist experts with document requests; update case file; process document productions; assist co-counsel with defendant production audit; assist with deposition preparations.	4	250	\$1,000.00	L140	BRM
12/3/2015	Searching for price charts; Searching for documents showing LiB shipments by size.	7	125	\$875.00	L140	AE
12/3/2015	Downloaded the PCT final translation documents of HML-P and NEC from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/3/2015	Update case file; review defendant claw-back request; begin sequestration of claw-back documents.	4.1	250	\$1,025.00	L140	BRM
12/3/2015	Prepare for deposition of Andrew Chung. Select exhibits and draft deposition outline.	4.5	600	\$2,700.00	L330	SES
12/4/2015	Targeted search for Andrew Chung documents for deposition.	5.8	350	\$2,030.00	L140	JC
12/4/2015	Drafted email to defense counsel explaining that we believe that they substantially changed the terms of the deal and there is no deal as it relates to stipulations for adding class representatives in preparation for plaintiffs filing their motion to amend.	0.2	400	\$80.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/4/2015	Reviewed Chung's discovery responses to identify every meeting where Young Wook Chung of LG Chem is listed in preparation of Chung deposition and communicated results to SES.	0.6	400	\$240.00	L110	CLC
12/4/2015	Coding documents showing LiB shipments by size.	3	125	\$375.00	L140	AE
12/4/2015	Prepare for deposition of Andrew Chung (LGC).	6.5	700	\$4,550.00	L330	JDF
12/4/2015	Downloaded the PCT final translation documents of LGC-MDL documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/4/2015	Continue sequestration and destruction of defendant claw-back documents; process document production; assist with deposition preparations.	5.1	250	\$1,275.00	L140	BRM
12/4/2015	Prepare for deposition of Andrew Chung. Select exhibits and draft deposition outline.	9.5	600	\$5,700.00	L330	SES
12/5/2015	Assist with document review regarding upcoming depositions.	2.5	250	\$625.00	L140	BRM
12/5/2015	Prepare for deposition of Andrew Chung. Select exhibits and draft deposition outline.	10	600	\$6,000.00	L330	SES
12/6/2015	Prepare for deposition of Andrew Chung. Select exhibits and draft deposition outline.	4	600	\$2,400.00	L330	SES
12/7/2015	Answer to senior partner's question re. YW Chung deposition; LiB team meeting.	2.8	350	\$980.00	L140	JC
12/7/2015	Met with case co-leads to discuss strategy for filing motion to amend to add class members.	0.5	400	\$200.00	L120	CLC
12/7/2015	Met with other co-lead to strategize upcoming Motion for Class Cert.	0.5	400	\$200.00	L210	CLC
12/7/2015	Weekly LiB meeting; Coding hot Sanyo Tachihara documents; Checking computer for NEC claw back documents; Searching for Kazunari Takeshima (NEC) documents.	6	125	\$750.00	L140	AE
12/7/2015	Prepare for deposition of Andrew Chung (LGC).	7.5	700	\$5,250.00	L330	JDF
12/7/2015	Downloaded the LIB PCT final translation documents of LGC-MDL and NEC from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/7/2015	Assist with deposition preparation; update case file; update document production log.	5.3	250	\$1,325.00	L140	BRM
12/7/2015	Call with co-leads regarding class certification motion and depositions. Draft outline of motion and <u>circulate to</u> co-leads.	1.5	600	\$900.00	L120	SES
12/8/2015	Search for documents relating to Chinese manufacturers' effect	7	350	\$2,450.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/8/2015	Fully coding NEC hot documents; Searching for and sending documents concerning Chinese LiB manufacturers.	8	125	\$1,000.00	L140	AE
12/8/2015	Prepare for deposition of Andrew Chung (LGC).	8.5	700	\$5,950.00	L330	JDF
12/8/2015	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	7.5	350	\$2,625.00	L140	НН
12/8/2015	Pulled out LIB conspiracy translation documents for experts and sent to Shana; Pulled out LIB of LG Chem/Toshiba/Sanyo/Sony product specs for experts and sent to Shana; Collected the LIB PCT final translation documents for Takeshima and YW Chung.	8	150	\$1,200.00	L140	CL
12/8/2015	Update case file; assist with deposition preparation.	5.8	250	\$1,450.00	L140	BRM
12/8/2015	Call with experts regarding class certification motion.	1	600	\$600.00	L130	SES
12/8/2015	Draft outline of motion for class certification, including directions to review team.	0.8	600	\$480.00	L210	SES
12/8/2015	Prepare for deposition of Andrew Chung. Confer with DPPs re same.	2.1	600	\$1,260.00	L330	SES
12/9/2015	Search for documents relating to the effect of the entrance of Chinese manufacturers	9	350	\$3,150.00	L140	JC
12/9/2015	Reviewing and coding hand-written Kazunari Takeshima (NEC) planner; Searching for, coding, and sending documents concerning Chinese LiB manufacturers.	8	125	\$1,000.00	L140	AE
12/9/2015	Take deposition of Andrew Chung (LGC)	10	700	\$7,000.00	L330	JDF
12/9/2015	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	9	350	\$3,150.00	L140	НН
12/9/2015	Downloaded the LIB PCT final translation documents of Sanyo, LGC and NEC from LCHB. Renamed and saved in the Batteries shared folder. Collected LIB PCT final translation documents for Takeshima and YW Chung.	0.2	150	\$30.00	L140	CL
12/9/2015	Deposition preparation - Chung; update case file.	9.5	250	\$2,375.00	L140	BRM
12/9/2015	Attend deposition of Young Wook (Andrew) Chung of LGC.	9	600	\$5,400.00	L330	SES
12/10/2015	Search for documents relating to the effect of the entrance of Chinese manufacturers	9	350	\$3,150.00	L140	JC
12/10/2015	Searching for, coding, and sending documents concerning Chinese LiB manufacturers; Checking computer for Hitachi Maxell claw back documents;	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Looking up employees with business cards to see if they're on hot documents.					
12/10/2015	Take deposition of Andrew Chung (LGC)	6.5	700	\$4,550.00	L330	JDF
12/10/2015	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	8.5	350	\$2,975.00	L140	НН
12/10/2015	Checked LIB claw back documents on desktop and translation documents in the Batteries shared folder; Downloaded LIB Takeshima, YW Chung PCT final translation documents and saved in the Batteries shared folder; Collected and compressed LIB PCT translation documents of Takeshima and YW Chung. Sent a zip file to Shana and Brian; Pulled out LIB - Minoru Kondo documents and sent to Shana.	3	150	\$450.00	L140	CL
12/10/2015	Update case file; review status of claw-back for Hitachi Maxell; process document production.	1	250	\$250.00	L140	BRM
12/10/2015	Attend deposition of Young Wook (Andrew) Chung of LGC.	5	600	\$3,000.00	L330	SES
12/10/2015	Draft summary of testimony for deposition of Young Wook (Andrew) Chung of LGC.	2	600	\$1,200.00	L210	SES
12/11/2015	Put together packer documents relating to " Search for documents relating to	9	350	\$3,150.00	L140	JC
12/11/2015	Sending and coding documents concerning Chinese LiB manufacturers; Searching for and coding documents concerning class cert issues.	8	125	\$1,000.00	L140	AE
12/11/2015	Search for documents demonstrating commodity-like nature of LIBs.	8.2	350	\$2,870.00	L140	HH
12/11/2015	Downloaded LIB - PANA PCT translation documents and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/11/2015	Attend discovery conference with LG Chem regarding metrics on MH Kim documents, amended responses to interrogatory no. 2 and privilege logs. Exchange schedule for motion to compel.	0.5	600	\$300.00	L390	SES
12/14/2015	Searching for and coding documents concerning class cert issues; Weekly LiB meeting; Writing up instructions on how to export documents from Catalyst.	6	125	\$750.00	L140	AE
12/14/2015	Search for documents demonstrating commodity-like nature of LIBs.	8.5	350	\$2,975.00	L140	HH

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/14/2015	Added English/FL column to the chart and filled in type of doc into new column; Pulled out LIB English documents of LG Chem for experts and sent to Shana; Downloaded the LIB final translation documents of PANA and LGC from LCHB. Renamed and saved in the Batteries shared folder.	2.1	150	\$315.00	L140	CL
12/14/2015	Team meeting; Research documents in the LIB database re Market Structure, Pass-Through.	3.6	325	\$1,170.00	L140	PAR
12/14/2015	Draft summary of Andrew Chung deposition to circulate to co-leads.	2.3	600	\$1,380.00	L210	SES
12/14/2015	Call with co-lead counsel from DPPs regarding LG Chem discovery motion and deposition status.	0.3	600	\$180.00	L120	SES
12/14/2015	Call with review team regarding assignments and case status.	0.5	600	\$300.00	L120	SES
12/15/2015	Answers to Team members' questions about Chinese imitation and pirated brands and goods appearing on Korean document.	0.5	350	\$175.00	L140	JC
12/15/2015	Searching for and coding documents concerning class cert issues.	8.3	125	\$1,037.50	L140	AE
12/15/2015	Search for documents demonstrating commodity-like nature of LIBs.	6	350	\$2,100.00	L140	HH
12/15/2015	Verify destruction of Hitachi Maxell claw-back production documents; update case file.	2.1	250	\$525.00	L140	BRM
12/15/2015	Research documents in the LIB database re Market Structure, Pass-Through.	7	325	\$2,275.00	L140	PAR
12/15/2015		1	600	\$600.00	L120	SES
12/16/2015	Searching for, coding, and sending documents concerning class cert issues.	8.5	125	\$1,062.50	L140	AE
12/16/2015	Attn. class cert. discovery.	4.5	700	\$3,150.00	L260	JDF
12/16/2015	Search for documents demonstrating commodity-like nature of LIBs.	9	350	\$3,150.00	L140	HH
12/16/2015	Downloaded PCT final translation documents of PANA, LG Chem, SDI-B and saved in the Batteries shared folder; Sent LG chemo document to Shana.	0.2	150	\$30.00	L140	CL
12/16/2015	Assist with deposition preparation; update case file.	1.5	250	\$375.00	L140	BRM
12/16/2015	Research documents in the LIB database re Market Structure, Pass-Through.	7	325	\$2,275.00	L140	PAR
12/16/2015	Call with co-lead counsel on discovery and class certification papers.	0.5	600	\$300.00	L120	SES
12/16/2015	Attend conference calls with experts regarding class certification testimony and outlines.	2	600	\$1,200.00	L130	SES
12/17/2015	Searching for and coding documents concerning class cert issues.	8	125	\$1,000.00	L140	AE
12/17/2015	Search for documents demonstrating commodity-like nature of LIBs.	9	350	\$3,150.00	L140	HH
12/17/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/17/2015	Update case file; assist with deposition preparations.	1.5	250	\$375.00	L140	BRM
12/17/2015	Research documents in the LIB database re Market Structure, Pass-Through.	8.5	325	\$2,762.50	L140	PAR
12/17/2015	Draft section of motion to compel privilege log from LG Chem regarding history of search term negotiations.	1.5	600	\$900.00	L210	SES
12/18/2015	Drafted plaintiffs' motion in support of their motion to amend by incorporating factual and legal research into motion in anticipation of sending to SES.	3	400	\$1,200.00	L210	CLC
12/18/2015	Conducted legal research to locate case law that supports plaintiffs' arguments in preparation for drafting plaintiffs' motion in support of their motion to amend.	2	400	\$800.00	L210	CLC
12/18/2015	Prepared outline in anticipating of drafting response to defendants' objection to plaintiffs' motion to amend by incorporating citations from case law and facts.	1	400	\$400.00	L210	CLC
12/18/2015	Reviewed examples of motions to amend filed in similar cases as well as defendants' objection to plaintiffs' motion to amend in preparation for drafting response.	2	400	\$800.00	L210	CLC
12/18/2015	Reviewed previous correspondence with co-leads and client questionnaires in order to sort out record in anticipation of drafting response to defendants' objection to plaintiffs' motion to amend.	1	400	\$400.00	L110	CLC
12/18/2015	Searching for, coding, and sending documents concerning class cert issues.	8.5	125	\$1,062.50	L140	AE
12/18/2015	Search for documents demonstrating commodity-like nature of LIBs.	5.5	350	\$1,925.00	L140	HH
12/18/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/18/2015	Process document productions; update case file; assist attorneys with issue/document requests.	2.5	250	\$625.00	L140	BRM
12/18/2015	Research documents in the LIB database re Market Structure, Pass-Through.	7.5	325	\$2,437.50	L140	PAR
12/19/2015	Emails to the following third parties regarding follow-up data questions: Newegg, Black & Decker, CompuCom, Motorola, Asus, Brandsmart, ABC Warehouse, CompUSA, Abt, Fry's, Fujitsu and SED Int'l.	1	600	\$600.00	L390	SES
12/19/2015	Review and send notes to CLC regarding motion for leave to amend the complaint.	0.5	600	\$300.00	L210	SES
12/20/2015	Updated class rep chart to indicate which states are still represented and which states no longer have representation.	1	400	\$400.00	L110	CLC
12/21/2015	Researched and edited plaintiffs' reply in support of motion to amend.	1.7	420	\$714.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/21/2015	Drafted plaintiffs' reply in support of motion to amend, incorporating case law and factual research from outline in order to craft arguments to rebut defendants' arguments.	2.3	420	\$966.00	L210	CLC
12/21/2015	Updated outline to incorporate defendants' arguments, case law to rebut defendants' arguments, and factual developments from the record in order to understand current class rep status and help develop arguments for plaintiffs' reply in support of motion to amend.	2.3	420	\$966.00	L210	CLC
12/21/2015	Researched case law to support plaintiffs' position and rebut defendants' case law in order to develop arguments in preparation for drafting plaintiffs' reply in support of the motion to amend.	3.5	420	\$1,470.00	L210	CLC
12/21/2015	Reviewed case law that defendants' cited to in their opposition to plaintiffs' motion to amend, looking for arguments to rebut their case law in preparation for drafting plaintiffs' reply in support of our motion to amend.	2	420	\$840.00	L210	CLC
12/21/2015	Reviewed defendants' opposition to plaintiffs' motion to amend to break out arguments for each plaintiffs in order to prepare plaintiffs' response to defendants' arguments.	0.5	420	\$210.00	L210	CLC
12/21/2015	Worked with co-leads and JD to determine whether class representatives in motion to amend still had qualifying purchases in order to clarify factual record to respond to defendants' arguments in plaintiffs' reply in support of motion to amend.	1.1	420	\$462.00	L210	CLC
12/21/2015	Searching for and coding documents concerning class cert issues.	8	125	\$1,000.00	L140	AE
12/21/2015	Edit and review class certification motion, expert reports, and evidence.	4.5	700	\$3,150.00	L260	JDF
12/21/2015	Search for documents demonstrating commodity-like nature of LIBs.	8	350	\$2,800.00	L140	HH
12/21/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/21/2015	Research documents in the LIB database re Market Structure, Pass-Through.	8	325	\$2,600.00	L140	PAR
12/22/2015	Revised plaintiffs' reply in support of the motion to amend in order include co-leads edits and remove dicta from footnote to include it in the body of the motion.	2.3	420	\$966.00	L210	CLC
12/22/2015	Updated complaint with corrections based on factual developments in anticipating of filing a revised complaint with plaintiffs' reply in support of our motion to amend.	0.8	420	\$336.00	L210	CLC
12/22/2015	Searching for, coding, and sending documents concerning class cert issues.	8	125	\$1,000.00	L140	AE
12/22/2015	Edit and review class certification motion, expert reports, and evidence.	3.7	700	\$2,590.00	L260	JDF
12/22/2015	Search for documents demonstrating commodity-like nature of LIBs.	9	350	\$3,150.00	L140	HH

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/22/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/22/2015	Sequester and destroy defendant claw-back documents; update case file; process document productions; assist attorneys with document requests.	5.4	250	\$1,350.00	L140	BRM
12/22/2015	Research documents in the LIB database re Market Structure, Pass-Through.	8	325	\$2,600.00	L140	PAR
12/22/2015	Edits to motion for leave to amend the complaint. Circulate to co-counsel.	2	600	\$1,200.00	L210	SES
12/23/2015	Worked with JD to have final drafts of complaint approved by co-leads, incorporate their final edits, and review and approval final draft to be submitted with the court.	1.8	420	\$756.00	L210	CLC
12/23/2015	Worked with JD and co-leads to revised plaintiffs' reply in support of motion to amend, incorporate edits, and make final edits in anticipation for filing.	3.2	420	\$1,344.00	L210	CLC
12/23/2015	Formatted and proofed letter to all counsel re amended complaint and served redlined version of the amended complaint.	1.5	250	\$375.00	L210	JSD
12/23/2015	Searching for and coding documents concerning class cert issues.	8	125	\$1,000.00	L140	AE
12/23/2015	Search for documents demonstrating commodity-like nature of LIBs.	9	350	\$3,150.00	L140	HH
12/23/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/23/2015	Process document productions; review document collections for expert review; assist attorneys with document requests; update case file.	3.1	250	\$775.00	L140	BRM
12/23/2015	Research documents in the LIB database re Market Structure, Pass-Through.	8	325	\$2,600.00	L140	PAR
12/23/2015	Review documents and draft market structure section of motion for class certification.	3.2	600	\$1,920.00	L210	SES
12/23/2015	Edits to motion for leave to amend the complaint. Oversaw filing of same.	3.5	600	\$2,100.00	L210	SES
12/24/2015	Process document productions; update case file and production logs.	3	250	\$750.00	L140	BRM
12/24/2015	Research documents in the LIB database re Market Structure, Pass-Through.	5	325	\$1,625.00	L140	PAR
12/24/2015	Review documents and draft market structure section of motion for class certification.	2	600	\$1,200.00	L210	SES
12/25/2015	Review documents and draft market structure section of motion for class certification.	2	600	\$1,200.00	L210	SES
12/26/2015	Review documents and draft market structure section of motion for class certification.	2	600	\$1,200.00	L210	SES
12/27/2015	Research documents in the LIB database re Market Structure, Pass-Through for class certification.	2	325	\$650.00	L140	PAR
12/27/2015	Review documents and draft market structure section of motion for class certification.	2	600	\$1,200.00	L210	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/28/2015	Reviewing Japanese-language doc for coworker; Coding documents related to class cert issue of key components; Searching for documents re defendant boards of directors.	6.8	125	\$850.00	L140	AE
12/28/2015	Search for documents demonstrating commodity-like nature of LIBs.	9	350	\$3,150.00	L140	HH
12/28/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/28/2015	Process document productions; review of production and load status for recent productions with co-counsel; update case file; assist attorneys with document requests.	1.4	250	\$350.00	L140	BRM
12/28/2015	Research documents in the LIB database re Market Structure, Pass-Through for class certification: Research documents in the LIB database re Documents showing for class certification.	8.3	325	\$2,697.50	L140	PAR
12/28/2015	Review draft report from expert; send assignments to document review team.	1	600	\$600.00	L210	SES
12/29/2015	Searching for documents re defendant boards of directors and reporting findings; Coding documents related to class cert issue of key components; Searching for Japanese documents related to class cert.	8.2	125	\$1,025.00	L140	AE
12/29/2015	Search for documents demonstrating commodity-like nature of LIBs.	8	350	\$2,800.00	L140	HH
12/29/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/29/2015	Update case file; assist attorneys and experts with document requests.	1.5	250	\$375.00	L140	BRM
12/29/2015	Research documents in the LIB database re Market Structure, Pass-Through for class certification: Research documents in the LIB database re Documents showing for class certification.	9.5	325	\$3,087.50	L140	PAR
12/30/2015	Searching for and sending Japanese documents re a class cert a class cert issue; Searching for and sending latest incidents of collusion for class cert.	8	125	\$1,000.00	L140	AE
12/30/2015	Search for documents demonstrating commodity-like nature of LIBs.	8.5	350	\$2,975.00	L140	HH
12/30/2015	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
12/30/2015	Process document productions; assist attorneys and experts with document requests; deposition preparation.	2.1	250	\$525.00	L140	BRM
12/30/2015	Research documents in the LIB database re cylindrical battery packs collusion for class certification: Research documents in the LIB database re Documents showing for class certification.	9	325	\$2,925.00	L140	PAR
12/30/2015	Call with co-leads and experts regarding class certification.	1	600	\$600.00	L120	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/30/2015	Review documents and outline motion for class certification.	10.5	600	\$6,300.00	L140	SES
12/31/2015	Updated chart for current class representatives; reviewed factual record to confirm standing.	1.6	420	\$672.00	L210	CLC
12/31/2015	Searching for and sending latest incidents of collusion for class cert; Collecting and sending documents related to class cert issue of key components.	4	125	\$500.00	L140	AE
12/31/2015	Search for Chinese and Korean documents re close of class period.	5	350	\$1,750.00	L140	HH
12/31/2015	Collect and organize documents regarding class certification briefing; update case file.	3.5	250	\$875.00	L140	BRM
12/31/2015	Research documents in the LIB database re substitutes for class certification.	5	325	\$1,625.00	L140	PAR
1/4/2016	Updated chart for current class representatives; reviewed factual record to confirm standing.	1.2	420	\$504.00	L210	CLC
1/4/2016	Searching for, coding, and sending documents related to the class cert issue of standardized cylindrical prices; Searching for documents related to the class cert issue of	8	125	\$1,000.00	L140	AE
1/4/2016	Edit and review class certification motion, expert reports, and evidence.	6.5	735	\$4,777.50	L260	JDF
1/4/2016	Search for documents demonstrating commodity-like nature of LIBs.	9	350	\$3,150.00	L140	HH
1/4/2016	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
1/4/2016	Organization of documents regarding class certification; deposition preparation; update case file.	3.8	265	\$1,007.00	L120	BRM
1/4/2016	Research documents in the LIB database re substitutes for class certification; Research documents in the LIB database re end price for power tools or camcorders for class certification.	8	325	\$2,600.00	L140	PAR
1/4/2016	Draft insert to motion for class certification regarding evidence of conspiracy and pretextual use of cobalt.	5.5	605	\$3,327.50	L260	SES
1/4/2016	Calls with experts re class certification briefs and reports.	1.5	605	\$907.50	L130	SES
1/4/2016	Draft proposed amended complaint.	3	605	\$1,815.00	L210	SES
1/5/2016	Drafted notice of withdrawal of previous motion to amend in batteries in anticipation of filing with the court, and re-filing a motion to amend.	0.4	420	\$168.00	L210	CLC
1/5/2016	Communicated potential class representative.	0.2	420	\$84.00	L120	CLC
1/5/2016	Searching for documents related to the class cert issue of LiB percentage of power tool and camcorder cost; Searching for, coding, and sending	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	cylindrical LiB price lists.					
1/5/2016	Edit and review class certification motion, expert reports, and evidence.	7.5	735	\$5,512.50	L260	JDF
1/5/2016	Search for documents demonstrating commodity-like nature of LIBs.	3	350	\$1,050.00	L140	HH
1/5/2016	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
1/5/2016	Downloaded the LIB final translation documents of HML-P, SONY, NEC, P-DOJ, SANYO, S-DOJ and LGC from LCHB. Renamed and saved in the Batteries shared folder; Updated LIB new production documents of NEC, SANYO, and PANA Bates ranges on the Assignment Master List; Putted LIB new production documents of NEC, SANYO and PANA into the right Collections.	2.5	150	\$375.00	L140	CL
1/5/2016	Process document productions; update case file.	1	265	\$265.00	L140	BRM
1/5/2016	Research documents in the LIB database substitutes for class certification.	8	325	\$2,600.00	L140	PAR
1/5/2016	Draft and circulate notice of withdrawal; conversations with clerk of court and co-counsel re same. File same.	3	605	\$1,815.00	L210	SES
1/6/2016	Searching for, coding, and sending cylindrical LiB price lists.	8	125	\$1,000.00	L140	AE
1/6/2016	Edit and review class certification motion, expert reports, and evidence.	7.5	735	\$5,512.50	L260	JDF
1/6/2016	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
1/6/2016	Updated LIB new production documents of NEC Bates ranges on the Assignment Master List; Putted LIB new production documents of NEC into the right Collections.	0.2	150	\$30.00	L140	CL
1/6/2016	Research documents in the LIB database substitutes for class certification.	6.5	325	\$2,112.50	L140	PAR
1/6/2016	Draft section of class certification motion re pass-through and market structure.	6	605	\$3,630.00	L210	SES
1/7/2016	Communicated with SES, JD, and potential class reps in order to determine if they could act as class reps for those states that would be dropped based on amendment of the class.	0.6	420	\$252.00	L210	CLC
1/7/2016	Searching for and coding hot BAJ documents.	8	125	\$1,000.00	L140	AE
1/7/2016	Edit and review class certification motion, expert reports, and evidence.	8.5	735	\$6,247.50	L260	JDF
1/7/2016	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
1/7/2016	Deposition preparation; update case file; review potential class member product information; process document production.	2.7	265	\$715.50	L330	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/7/2016	Research documents in the LIB database for class certification.	5.6	325	\$1,820.00	L140	PAR
1/7/2016	Draft section of class certification motion regarding evidence of conspiracy and pretextual use of cobalt. Edit motion for class certification.	9.1	605	\$5,505.50	L210	SES
1/8/2016	Searching for and coding hot BAJ documents; Searching for documents related to the class cert issue of LiB percentage of power tool and camcorder cost.	8	125	\$1,000.00	L140	AE
1/8/2016	Edit and review class certification motion, expert reports, and evidence.	6.2	735	\$4,557.00	L260	JDF
1/8/2016	Review and search documents in LGC productions at request of IPP experts.	8	125	\$1,000.00	L140	JWJ
1/8/2016	Downloaded the LIB final translation documents of SDI-B, HML-P, and SONY-LIB. Renamed and saved in the Batteries shared folder.	0.5	150	\$75.00	L140	CL
1/8/2016	Update case file; review product information regarding potential new plaintiff.	2.4	265	\$636.00	L120	BRM
1/8/2016	Research documents in the LIB database substitutes for class certification; Research documents in the LIB database re lithium-ion battery as a key component driving costs of power tools and camcorders.	8	325	\$2,600.00	L140	PAR
1/8/2016	Draft section of class certification motion regarding evidence of conspiracy and pretextual use of cobalt. Edit motion for class certification.	8.3	605	\$5,021.50	L210	SES
1/9/2016	Call with co-leads re structure of class certification motion.	1	605	\$605.00	L260	SES
1/11/2016	Search to answer to supervising attorney's question re. same U.S. address of HLDS and LGCAI.	1	350	\$350.00	L140	JC
1/11/2016	Communicated with SES and JD regarding finding class members for motion to amend and worked on determining whether particular purchases were cylindrical so that those products and class reps could be included in the class.	1.3	420	\$546.00	L210	CLC
1/11/2016	Searching for documents related to the class cert issue of Searching for LGC and HLDS US office addresses.	7	125	\$875.00	L140	AE
1/11/2016	Edit and review class certification motion, expert reports, and evidence.	6.2	735	\$4,557.00	L260	JDF
1/11/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/11/2016	Update case file.	0.4	265	\$106.00	L120	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/11/2016	Research documents in the LIB database re Research re Toshiba antitrust compliance policy; Research re HLDS and LG Chem sharing office space in US for class certification motion.	7.2	325	\$2,340.00	L140	PAR
1/11/2016	Review expert reports. Edit motion for class certification (market structure and pass-through sections).	7.8	605	\$4,719.00	L260	SES
1/12/2016	Created a chart including plaintiffs' qualifying purchases, state, and name, similar to charts previously created by researching each plaintiffs' purchases based on their purchase documents and interrogatory responses and comparing to the complaint to ensure that each is consistent in anticipation of including as an attachment in the motion to amend.	2.6	420	\$1,092.00	L210	CLC
1/12/2016	Reviewed discovery responses from class reps and compared each purchase with their interrogatory responses and communicated with co-leads in order to resolve inconsistencies between discrepancies in complaint.	1.2	420	\$504.00	L210	CLC
1/12/2016	Updated chart and complaint when information became available from class reps, updated the complaint to ensure that each plaintiffs' purchases were the same as their interrogatory responses and reviewed the motion to amend in anticipation of filing with the court.	2.8	420	\$1,176.00	L210	CLC
1/12/2016	Searching for documents related to the class cert issue ; Searching for competitor info exchange at	8	125	\$1,000.00	L140	AE
1/12/2016	Edit and review class certification motion, expert reports, and evidence.	7.2	735	\$5,292.00	L260	JDF
1/12/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/12/2016	Update case file; prepare third-party productions for production to defendants.	2.3	265	\$609.50	L312	BRM
1/12/2016	Research documents in the LIB database re lithium-ion battery as a key component driving costs of power tools and camcorders for class certification.	4.7	325	\$1,527.50	L140	PAR
1/13/2016	Worked with JD to solve final issues with Attachment A to motion to amend and ensure that all plaintiffs' purchases in complaint and motion to amend were the same in preparation for filing with the court.	1.6	420	\$672.00	L210	CLC
1/13/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/13/2016	Downloaded the LIB final translation documents of LGC's Supp, SANYO- C, and SONY-LIB from LCHB. Renamed and saved in the Batteries shared folder.	0.5	150	\$75.00	L140	CL
1/13/2016	Document review per attorney request (class certification cites); update case file.	1.1	265	\$291.50	L260	BRM
1/14/2016	Communicated with JD, SES, and plaintiffs' counsel to determine status of class reps, then included verified purchases in Attachment A of motion to amend in anticipation of filing.	0.8	420	\$336.00	L210	CLC
1/14/2016	Reviewed motion to amend in order to determine which edits were made by co-leads so that JD could include edits into the complaint in anticipation of filing with court.	0.6	420	\$252.00	L210	CLC
1/14/2016	Reviewed and edited Attachment A and complaint in preparation for filing motion to amend.	1.4	420	\$588.00	L210	CLC
1/14/2016	Compared Attachment A of Motion to Amend with Complaint to ensure that all purchases were accurate by comparing them to interrogatory responses in preparation for filing.	1.3	420	\$546.00	L210	CLC
1/14/2016	Searching for competitor info exchange at	6.5	125	\$812.50	L140	AE
1/14/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/14/2016	Downloaded the LIB final translation of SANYO-C from LCHB and saved in the Batteries shared folder; Searched for LIB Toshiba exhibits for translation objection and sent to Richard Noh.	1.1	150	\$165.00	L140	CL
1/14/2016	Assist experts with document requests; update case file; organize related case pleadings for attorney review.	2.1	265	\$556.50	L130	BRM
1/14/2016	Edit motion for leave to amend complaint.	2	605	\$1,210.00	L210	SES
1/15/2016	Worked on updating current class rep chart and amended complaint as information about class representatives developed in anticipation of filing motion to amend.	0.5	420	\$210.00	L210	CLC
1/15/2016	Searching for competitor info exchange Checking Checking custodians for involvement in cylindrical LiB business.	8	125	\$1,000.00	L140	AE
1/15/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/18/2016	Edit and review class certification motion, expert reports, and evidence.	5.5	735	\$4,042.50	L260	JDF
1/19/2016	Checking custodians for involvement in cylindrical LiB business.	8	125	\$1,000.00	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/19/2016	Edit and review class certification motion, expert reports, and evidence.	4.5	735	\$3,307.50	L260	JDF
1/19/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/19/2016	Downloaded the LIB final translation of Sanyo, Sanyo-C, and LGC Supplemental Response Set 1 and Saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
1/20/2016	Checking custodians for involvement in cylindrical LiB business.	1.5	125	\$187.50	L140	AE
1/20/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/20/2016	Edit motion for class certification; research and edit motion for leave to amend complaint.	4.5	605	\$2,722.50	L210	SES
1/21/2016	Reviewed motion to amend and updated chart (Attachment A).	1.5	420	\$630.00	L210	CLC
1/21/2016	Compared amended versions of the complaint to create final list of class representatives. Communicated with paralegal re same.	0.7	420	\$294.00	L210	CLC
1/21/2016	Checking custodians for involvement in cylindrical LiB business.	8	125	\$1,000.00	L140	AE
1/21/2016	Edit and review class certification motion, expert reports, and evidence.	8.5	735	\$6,247.50	L260	JDF
1/21/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/21/2016	Downloaded the LIB Defendant and DAPs translation documents from LCHB and saved in the Batteries shared folder.	0.5	150	\$75.00	L140	CL
1/21/2016	Update case file.	0.9	265	\$238.50	L120	BRM
1/21/2016	Review report of R. Abrantes-Metz; edit motion for class certification.	2	605	\$1,210.00	L260	SES
1/22/2016	Communicated with departing class rep in order to determine status of plaintiff and where to send letter of dismissal, then communicated this to team.	0.1	420	\$42.00	L120	CLC
1/22/2016	Reviewed, revised, edited, and made changes to motion to amend and proposed amended complaint in anticipation for filing with court.	2.1	420	\$882.00	L210	CLC
1/22/2016	Compared Attachment A class rep chart with complaint to make sure that the products and class reps were accurate.	0.7	420	\$294.00	L210	CLC
1/22/2016	Reviewed and edited proposed amended complaint.	0.5	420	\$210.00	L210	CLC
1/22/2016	Worked with SES and JD to solve inconsistencies between motion to amend and proposed amended complaint and make final edits to Attachment A based on interrogatory responses.	1.2	420	\$504.00	L210	CLC
1/22/2016	Checking custodians for involvement in cylindrical LiB business.	8	125	\$1,000.00	L140	AE
1/22/2016	Edit and review class certification motion, expert reports, and evidence.	7	735	\$5,145.00	L260	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/22/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/22/2016	Pulled out the LIB CT translation documents that listed on the expert report and sent to Shana and Brian.	2.5	150	\$375.00	L140	CL
1/22/2016	Assist with preparation of class representative letters; prepare proposed complaint for Hawaii attorney general; update case file.	2.2	265	\$583.00	L210	BRM
1/22/2016	Edit and oversaw filing of motion to amend and proposed amended pleading.	1	605	\$605.00	L210	SES
1/22/2016	Edit motion to amend and proposed amended pleading.	1	605	\$605.00	L210	SES
1/25/2016	Spoke with KP at SG in order to figure out status of class rep and provide her with further information so that she could email class reps to set up depositions.	0.1	420	\$42.00	L330	CLC
1/25/2016	Spoke with DL at CPM in order to determine issues with Donna Shawn as class rep.	0.2	420	\$84.00	L120	CLC
1/25/2016	Composed email and emailed Kevin Young regarding his dismissal with prejudice.	0.2	420	\$84.00	L120	CLC
1/25/2016	Called Donna Shawn's counsel in order to determine whether Donna Shawn or the Shawn estate is the appropriate class rep based on emails received from CPM.	0.1	420	\$42.00	L120	CLC
1/25/2016	Communicated with Krysta at SG regarding contact information of class representatives in anticipation of scheduling class representative depositions.	0.3	420	\$126.00	L330	CLC
1/25/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/25/2016	Moved the Batteries data for use from Desktop to User's directory.	1.5	150	\$225.00	L140	CL
1/25/2016	Download and organize class certification briefing; update case file.	2.9	265	\$768.50	L260	BRM
1/26/2016	Communicated with KP at SG regarding scheduling deposition preparation sessions for class representatives.	0.3	420	\$126.00	L330	CLC
1/26/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/26/2016	Prepare third-party notifications and support documents regarding material used in class certification briefing; update case file.	4.9	265	\$1,298.50	L260	BRM
1/27/2016	Looked for Apple product sent by Gail Murphy to send to KP at SG as discussed during call.	0.5	420	\$210.00	L390	CLC
1/27/2016	Met with KP at SG and Cindy Booze to discuss defendants' discovery requests and setting up a deposition date.	0.3	420	\$126.00	L311	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/27/2016	Communicated with KP at SG and looked for photo for Gail Murphy because Gail had other photos besides that previous photo sent based on her productions in ODD.	0.3	420	\$126.00	L312	CLC
1/27/2016	Spoke with Joseph Pankow regarding his interrogatory responses and request for productions and setting up his deposition date.	0.2	420	\$84.00	L312	CLC
1/27/2016	Communicated with KP at SG and MC at CPM regarding plaintiffs' interrogatory responses.	0.2	420	\$84.00	L312	CLC
1/27/2016	Reviewed defendants RFP and interrogatories in anticipation of call with Gail Murphy.	0.3	420	\$126.00	L312	CLC
1/27/2016	Attended call with KP at SG to help prepare class rep Gail Murphy for future discovery by defendants.	0.5	420	\$210.00	L312	CLC
1/27/2016	Communicated with KP from SG to set up meeting w/ plaintiffs to begin scheduling their depositions and further discovery.	0.1	420	\$42.00	L390	CLC
1/27/2016	Attn. discovery motions.	3.5	735	\$2,572.50	L312	JDF
1/27/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/27/2016	Pulled out the LIB translation documents on the Learner materials cited doc that end in E and CT and sent to Brian.	0.5	150	\$75.00	L140	CL
1/27/2016	Assist with preparation and production of expert backup data; update case file.	1	265	\$265.00	L130	BRM
1/28/2016	Reviewed document productions of Matthew Ence's to prepare amended discovery responses.	1.5	420	\$630.00	L312	CLC
1/28/2016	Reviewed document productions of Matthew Ence's to prepare amended discovery responses.	0.2	420	\$84.00	L312	CLC
1/28/2016	Reviewed email from DXL and responded re ongoing class representative discovery.	0.2	420	\$84.00	L312	CLC
1/28/2016	Met with Matthew Ence to plan for his deposition and discovery requests.	0.3	420	\$126.00	L311	CLC
1/28/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC).	8	125	\$1,000.00	L140	JWJ
1/28/2016	Sent letters to non-parties regarding order from court on deadline for motions to seal.	0.5	605	\$302.50	L390	SES
1/29/2016	Met with John Kopp regarding discovery responses.	0.5	420	\$210.00	L312	CLC
1/29/2016	Attn. discovery motions.	2.7	735	\$1,984.50	L312	JDF
1/29/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	(LGC).					
1/29/2016	Review documents for deposition of Jae Jeung Joe (LGC).C5117	1	605	\$605.00	L140	SES
1/29/2016	Call with co-leads on the status of discovery, settlements and proposed strategies.	1	605	\$605.00	L390	SES
1/29/2016	Call with Illinois representative John Kopp.	0.2	605	\$121.00	L120	SES
2/1/2016	LiB review team meeting.	0.2	350	\$70.00	L140	JC
2/1/2016	Met with SES and document reviewer team to strategize and prepare for upcoming depositions.	0.4	420	\$168.00	L330	CLC
2/1/2016	Cleaned up and updated calendar.	0.5	265	\$132.50	L120	JSD
2/1/2016	Cleaned up and updated calendar.	2	265	\$530.00	L390	JSD
2/1/2016	Prepare for hearing on LG Chem Depo Docs, cellphone records and data.	4.2	735	\$3,087.00	L390	JDF
2/1/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/1/2016	Downloaded the translation documents of Sanyo-C and Sony-LIB from LCHB. Renamed and Saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/1/2016	Call with reviewers regarding assignments and status of review.	0.5	605	\$302.50	L120	SES
2/2/2016	Identifying best Panasonic deponents; Collecting and sending Michinori Sawai (Hitachi Maxell) hot documents.	8	125	\$1,000.00	L140	AE
2/2/2016	Prepare for hearing on LG Chem Depo Docs, cellphone records and data.	3.5	735	\$2,572.50	L390	JDF
2/2/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/2/2016	Pulled out the LIB original and translation documents of Jaejeong Joe deposition Chronology and sent to Shana and Brian.	1.5	150	\$225.00	L140	CL
2/2/2016	Prepare related-case productions for production in current case; update case file; process defendant document productions.	4.2	265	\$1,113.00	L140	BRM
2/2/2016	Call with DPPs re Sawai (HML) and Joe (LGC) depositions, and upcoming motion to compel documents and privilege log from LGC.	1	605	\$605.00	L390	SES
2/3/2016	Located and pulled documents re Joe.	2	265	\$530.00	L390	JSD
2/3/2016	Reviewed docket and update service list.	1	265	\$265.00	L120	JSD
2/3/2016	Creating memo about best Panasonic deponents; Identifying best Sanyo	8.5	125	\$1,062.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	deponents.					
2/3/2016	Prepare for hearing on LG Chem Depo Docs, cellphone records and data.	2.1	735	\$1,543.50	L230	JDF
2/3/2016	Call with co-lead counsel.	1	735	\$735.00	L120	JDF
2/3/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	5.5	125	\$687.50	L140	JWJ
2/3/2016	Pulled out the LG Chem documents. Checked the number of pages of LG Chem documents before send them out for translations; Downloaded the LIB original and translation hot documents on the JJ Joe chart.	2.3	150	\$345.00	L140	CL
2/3/2016	Process document productions; update case file; assist with deposition preparations.	3.7	265	\$980.50	L140	BRM
2/3/2016	Call with co-leads regarding upcoming assignments and strategy.	0.5	605	\$302.50	L120	SES
2/4/2016	Telephone conference with Friedman re motion.	0.5	950	\$475.00	L120	SWB
2/4/2016	Added purchase date of Apple laptops to class list in anticipation of preparing filings with court.	1.1	420	\$462.00	L110	CLC
2/4/2016	Updated third party chart.	0.6	265	\$159.00	L120	JSD
2/4/2016	Located and pulled documents re Joe.	2	265	\$530.00	L390	JSD
2/4/2016	Identifying best Sanyo deponents.	8.5	125	\$1,062.50	L140	AE
2/4/2016	Attend hearing re LG Chem Depo Docs and Cellphone Records and Data	2.5	735	\$1,837.50	L230	JDF
2/4/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/4/2016	Updated an Excel chart of JJ Joe hot documents. Sent the LIB CT translation and none translation documents with the Excel chart to Shana.	1	150	\$150.00	L140	CL
2/4/2016	Update case file; assist with deposition preparations.	2.4	265	\$636.00	L140	BRM
2/4/2016	Attend hearing before Magistrate Judge Ryu regarding motion to compel documents from Donny Lee deposition refreshing recollection, motion to compel privilege log, motion to compel phone records.	2	605	\$1,210.00	L230	SES
2/5/2016	Researched finding model numbers and serial numbers for products class reps purchased and included in the chart in anticipation of including in filing with court.	3	420	\$1,260.00	L110	CLC
2/5/2016	Creating a memo about best Sanyo deponents.	8.5	125	\$1,062.50	L140	AE

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/5/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/5/2016	Downloaded LIB final translation document of PANA and saved in the Batteries shared folder; Put new production documents of PANA, PAN, SANYO-C, SANYO, SNA, and HML-P into the right collections in Catalyst.	1.1	150	\$165.00	L140	CL
2/5/2016	Update case file.	1	265	\$265.00	L140	BRM
2/5/2016	Research regarding use of Hague Convention to obtain deposition testimony in Korea. Telephone call with IPPs and DPPs re same.	2	605	\$1,210.00	L210	SES
2/8/2016	Email communications with a supervising attorney and team member in lieu of LiB Team Meeting; LiB document review to select LiB witnesses.	9.6	350	\$3,360.00	L140	JC
2/8/2016	Worked with KP at SG to confirm standing of class representatives, to prepare discovery responses and prepare for deposition.	1.9	420	\$798.00	L120	CLC
2/8/2016	Conducted factual research regarding standing of class representatives in anticipation of filing motion to amend.	2.3	420	\$966.00	L210	CLC
2/8/2016	Travel arrangements for class representatives for their depositions.	2	265	\$530.00	L330	JSD
2/8/2016	Creating and sending a memo about best Sanyo deponents.	4.5	125	\$562.50	L140	AE
2/8/2016	Edit requests and analyze discovery issues.	1.3	735	\$955.50	L390	JDF
2/8/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/8/2016	Pulled out the LIB - Donny Lee Documents and Sent to Shana; Put the LIB new production documents of PANA, PNA, SANYO, and SNA into the right collections in Catalyst.	1.1	150	\$165.00	L140	CL
2/8/2016	Update case file.	1	265	\$265.00	L140	BRM
2/8/2016	Review defendants' opposition to motion to amend; research and draft reply in support of the motion to amend.	8.2	605	\$4,961.00	L210	SES
2/9/2016	LiB document review to select LiB witnesses.	3.2	350	\$1,120.00	L140	JC
2/9/2016	Researched issue of whether it is possible/appropriate to depose a Korean witness abroad through the Hague Convention for SES.	3	420	\$1,260.00	L210	CLC
2/9/2016	Located and pulled documents and prepared binder.	2	265	\$530.00	L390	JSD
2/9/2016	Prepared an updated class rep contact list.	1	265	\$265.00	L120	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/9/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/9/2016	Update case file.	0.8	265	\$212.00	L140	BRM
2/9/2016	Edit reply in support of motion to amend; communicate with co-counsel re same.	1.3	605	\$786.50	L210	SES
2/9/2016	Call with co-leads re discovery status, upcoming case management conference and depositions.	0.5	605	\$302.50	L120	SES
2/10/2016	Researched cross jurisdictional tolling to include in plaintiffs' reply in support of the motion to amend.	2.9	420	\$1,218.00	L210	CLC
2/10/2016	Reviewed prior motions to amend in batteries and defendants' opposition in preparation for drafting plaintiffs' reply, cross jurisdictional tolling section.	0.7	420	\$294.00	L210	CLC
2/10/2016	Researched status of Apple products (and batteries) for inclusion in reply in support of motion to amend.	4.1	420	\$1,722.00	L110	CLC
2/10/2016	Assisted KP from SG in preparing plaintiffs' supplemental responses to interrogatories and preparing for plaintiffs' depositions.	0.5	420	\$210.00	L110	CLC
2/10/2016	Updated third party chart.	0.5	265	\$132.50	L390	JSD
2/10/2016	Researching potential Sanyo deponents; Reformatting potential Sanyo deponents and researching their employment dates.	5.7	125	\$712.50	L140	AE
2/10/2016	Call with co-lead counsel.	0.5	735	\$367.50	L120	JDF
2/10/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/10/2016	Update case file; process document production.	0.9	265	\$238.50	L140	BRM
2/10/2016	Edit reply in support of motion to amend; communicate with co-counsel re same.	7.8	605	\$4,719.00	L210	SES
2/10/2016	Telephone call with counsel in Korean Noodles case re obtaining deposition testimony through letters rogatory.	0.5	605	\$302.50	L330	SES
2/11/2016	Drafted 30(b)(6) for third-party Apple in order to determine which products contain cylindrical batteries.	1.6	420	\$672.00	L311	CLC
2/11/2016	Researched cross jurisdictional tolling in and drafted reply in support of motion to amend on issue.	6.9	420	\$2,898.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/11/2016	Prepared 30(b)(6) Notice and subpoena to Apple Inc.	1	265	\$265.00	L390	JSD
2/11/2016	Proofed, fact-checked and quote-checked reply in support of leave to amend complaint.	3	265	\$795.00	L210	JSD
2/11/2016	Researching whether potential Sanyo deponents are current or former; Researching and ranking potential LGC deponents.	7.5	125	\$937.50	L140	AE
2/11/2016	Edit requests and analyze discovery issues.	2.2	735	\$1,617.00	L390	JDF
2/11/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/11/2016	Update case file; process document productions.	1.3	265	\$344.50	L140	BRM
2/11/2016	Research and draft reply in support of motion to amend.	5.1	605	\$3,085.50	L210	SES
2/12/2016	Edited and proofread reply in support of motion to amend.	1.5	420	\$630.00	L210	CLC
2/12/2016	Reviewed question from SES on Tenn. law and made changes to brief to clarify status of law in IPPs' reply in support of motion to amend in anticipation of filing with court.	0.2	420	\$84.00	L210	CLC
2/12/2016	Met with SES to discuss how to draft third-party discovery requests in anticipation of sending 30(b)(6) to Apple.	0.2	420	\$84.00	L311	CLC
2/12/2016	Reviewed articles and websites in order to determine battery cell type in Canon camcorder in anticipation of including in plaintiffs' reply in support of motion to amend.	2.7	420	\$1,134.00	L110	CLC
2/12/2016	Travel arrangements for class rep depositions; communicated with class representatives re same.	1	265	\$265.00	L390	JSD
2/12/2016	Proofed, fact-checked and quote-checked reply in support of leave to amend complaint; efiled the same.	5.5	265	\$1,457.50	L210	JSD
2/12/2016	Researching and ranking potential LGC deponents.	2.5	125	\$312.50	L140	AE
2/12/2016	Attend status conference.	1.5	735	\$1,102.50	L230	JDF
2/12/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/12/2016	Loaded the LGC translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/12/2016	Update case file.	0.8	265	\$212.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/12/2016	Research plaintiffs' portion of joint letter brief re obtaining Kwak deposition through letters rogatory.	2	605	\$1,210.00	L311	SES
2/12/2016	Edit reply in support of motion to amend; communicate with co-counsel re same. Oversaw filing of same.	7.3	605	\$4,416.50	L210	SES
2/15/2016	Worked and communicated with KP and SG in order to provide her with class rep information and schedule plaintiffs' depositions in anticipation of preparing for plaintiffs' depositions.	0.4	420	\$168.00	L311	CLC
2/15/2016	Edit requests and analyze discovery issues.	2.2	735	\$1,617.00	L390	JDF
2/16/2016	Researched third parties' websites in order to determine whether they are still relevant to the class and whether plaintiffs should gather data from them.	0.5	420	\$210.00	L110	CLC
2/16/2016	Reviewed third party subpoena chart and reviewed their websites, filling in the chart with info as to whether they sell or purchased cylindrical batteries in anticipation of enforcing subpoena against them to get their data.	1	420	\$420.00	L110	CLC
2/16/2016	Consolidated all potential witness lists from co-leads for SES.	1.6	420	\$672.00	L110	CLC
2/16/2016	Reviewed complaint and class certification motion in order to determine which data is relevant in anticipation of completing third-party subpoena chart.	1	420	\$420.00	L210	CLC
2/16/2016	Proofed Best Buy Stip. and Proposed Order re Admin. Motion to Seal Materials re Motion for Class Certification and efiled the same.	1	265	\$265.00	L210	JSD
2/16/2016	Attn. third party discovery.	4.5	735	\$3,307.50	L390	JDF
2/16/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/16/2016	Put the LIB new production documents of PANA-C, SANYO-C, SANYO, and SNA into the right collections in Catalyst.	0.5	150	\$75.00	L140	CL
2/16/2016	Update case file.	0.5	265	\$132.50	L140	BRM
2/16/2016	Research plaintiffs' portion of joint letter brief re obtaining Kwak deposition through letters rogatory. Speak with counsel in Seoul, Korea re same.	7.8	605	\$4,719.00	L210	SES
2/17/2016	Reviewed stipulation and communicated with defendants to get their approval; oversaw filing of same.	1.1	420	\$462.00	L210	CLC
2/17/2016	Researched third parties to determine whether plaintiffs should pursue obtaining data from them in anticipation of understanding pass through.	1.2	420	\$504.00	L110	CLC
2/17/2016	Prepared amended notice of 30(b)(6) deposition to Apple and served the	1	265	\$265.00	L311	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	same.					
2/17/2016	Proofed Black & Decker Stip. and Proposed Order re Admin. Motion to Seal Materials re Motion for Class Certification and efiled the same.	1	265	\$265.00	L210	JSD
2/17/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures; located and pulled exhibits.	4	265	\$1,060.00	L210	JSD
2/17/2016	Call with co-lead counsel.	0.5	735	\$367.50	L120	JDF
2/17/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/17/2016	Downloaded LGC translation documents and saved in the Batteries shared folder; Checked on the LIB exhibit of Takeshima, Kazunari deposition document for Shana.	0.4	150	\$60.00	L140	CL
2/17/2016	Update case file.	0.7	265	\$185.50	L140	BRM
2/17/2016	Review documents and select exhibits for deposition of Jaejeung Joe (LGC).	4	605	\$2,420.00	L140	SES
2/17/2016	Call with co-leads on strategy and settlement discussions.	0.5	605	\$302.50	L120	SES
2/18/2016	Reviewed Magistrate Judge Ryu's transcript and began writing Administrative Motion for extension of page limit for joint letter brief regarding the Hague Convention.	2.2	420	\$924.00	L210	CLC
2/18/2016	Formatted and proofed Stipulation and Proposed Order re deadline and page limits re the Hague Convention Procedures.	1.5	265	\$397.50	L210	F
2/18/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures; located and pulled exhibits; prepared Scarlett declaration.	4.2	265	\$1,113.00	L210	JSD
2/18/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/18/2016	Downloaded the LG Chem translation documents. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
2/18/2016	Assist with deposition preparations; update case file.	2.5	265	\$662.50	L140	BRM
2/18/2016	Amend letter brief regarding letters of request pursuant to Hague Convention.	0.2	605	\$121.00	L210	SES
2/18/2016	Call with J. Choi re declaration regarding letters of request pursuant to Hague Convention.	0.8	605	\$484.00	L130	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/19/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures.	1	265	\$265.00	L210	JSD
2/19/2016	Formatted and proofed Stipulation and Proposed Order re deadline and page limits re the Hague Convention Procedures and efiled the same; prepared chamber's copy and arranged for its delivery to the court.	2.8	265	\$742.00	L210	JSD
2/19/2016	Edit requests and analyze discovery issues.	2.2	735	\$1,617.00	L390	JDF
2/19/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/19/2016	Update case file; assist attorney with document review.	1	265	\$265.00	L140	BRM
2/19/2016	Edit plaintiffs' insert to joint letter brief re Hague Convention.	3.1	605	\$1,875.50	L210	SES
2/19/2016	Draft stipulation and circulate to LG Chem regarding extension of page limits; time; and exhibits for joint letter brief re Hague Convention.	1	605	\$605.00	L210	SES
2/22/2016	Researched third parties to determine whether pass through data will still be relevant to narrowed class definition in anticipation of gathering data from third parties.	3	420	\$1,260.00	L110	CLC
2/22/2016	Prepared notice of appearance for JCP and efiled the same.	1	265	\$265.00	L210	JSD
2/22/2016	Prepared Proposed Order re page limitation and exhibits re joint letter brief on the Hague Procedures and efiled the same.	0.8	265	\$212.00	L120	JSD
2/22/2016	Located and pulled documents for JCP.	2	265	\$530.00	L120	JSD
2/22/2016	Research regarding Sanyo deponents.	5.2	125	\$650.00	L140	AE
2/22/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee; meeting with SES.	8	125	\$1,000.00	L140	JWJ
2/22/2016	Downloaded the HML-P translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/22/2016	Review pleadings in ODD re class cert as it relates to LIB; confer with SES re same.	5.3	575	\$3,047.50	L120	JCP
2/22/2016	Confirming Panasonic requested claw back documents were not stored electronically.	0.3	325	\$97.50	L140	PAR
2/22/2016	Call with reviewers regarding deposition preparation and strategy.	0.3	605	\$181.50	L120	SES
2/22/2016	Draft letter to LGC re Jae Jeong Joe deposition and Hague convention.	0.5	605	\$302.50	L311	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/23/2016	Researched third party companies and entered findings into chart in anticipation of gathering data from third parties.	6.9	420	\$2,898.00	L110	CLC
2/23/2016	Researching Sanyo and Panasonic deponents; Creating Naoki Ikegami (Sanyo) depo chron.	8	125	\$1,000.00	L140	AE
2/23/2016	Edit requests and analyze discovery issues.	2.7	735	\$1,984.50	L390	JDF
2/23/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/23/2016	Process document productions; confirm destruction of inadvertently produced privileged documents; update case file.	2.3	265	\$609.50	L140	BRM
2/23/2016	Review pleadings from ODD as it relates to LIB and review pleadings from ODD; confer with SES re same.	8.7	575	\$5,002.50	L120	JCP
2/23/2016	Telephone call with JCP re case status.	0.5	605	\$302.50	L390	SES
2/23/2016	Telephone call with A. Sheanin re Jae Jeong Joe deposition, letter from LGC re same.	0.5	605	\$302.50	L390	SES
2/24/2016	Reviewed class cert papers in anticipation of updating third-party subpoena chart to determine which parties had produced data.	0.4	420	\$168.00	L210	CLC
2/24/2016	Proofed, fact-checked and quote-checked joint letter brief re Jae Jeong Joe deposition and circulated the same to defense counsel.	2.5	265	\$662.50	L210	JSD
2/24/2016	Updated deposition calendar; arranged court reporter coverage of depositions.	1	265	\$265.00	L390	JSD
2/24/2016	Formatted and proofed letter to LG Chem.	0.6	265	\$159.00	L390	JSD
2/24/2016	Creating Naoki Ikegami (Sanyo) depo chron.	4.8	125	\$600.00	L140	AE
2/24/2016	Call with co-lead counsel.	1	735	\$735.00	L120	JDF
2/24/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/24/2016	Downloaded the translation documents of HML, LGC, and Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/24/2016	Update case file; review status of potential deposition exhibit translations; review related-case plaintiff productions for relevant documents.	3	265	\$795.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/24/2016	Call with co-leads re discovery and strategy issues.	0.5	605	\$302.50	L120	SES
2/24/2016	Draft letter to M. Lemberg re scheduling of Joe deposition and need for joint letter brief. Circulate to co-leads for comment.	1	605	\$605.00	L311	SES
2/24/2016	Telephone call with M. Lemberg re Jae Jeong Joe deposition.	0.5	605	\$302.50	L390	SES
2/25/2016	Searched local drives for claw back documents to make sure no claw back documents remain on the system.	3	265	\$795.00	L390	JSD
2/25/2016	Updated calendar.	0.5	265	\$132.50	L210	JSD
2/25/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures; located and pulled exhibits; updated Scarlett declaration.	2.5	265	\$662.50	L210	JSD
2/25/2016	Creating Naoki Ikegami (Sanyo) depo chron.	6.7	125	\$837.50	L140	AE
2/25/2016	Edit requests and analyze discovery issues.	2.5	735	\$1,837.50	L390	JDF
2/25/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	6.5	125	\$812.50	L140	JWJ
2/25/2016	Downloaded the translation documents of LGC and HML from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
2/25/2016	Update case file.	0.8	265	\$212.00	L140	BRM
2/25/2016	M&C re Joe dep; confer with SES re same; read materials re same.	1.8	575	\$1,035.00	L390	JCP
2/25/2016	Edit plaintiffs' insert to joint letter brief re Hague Convention. Research re same.	2	605	\$1,210.00	L311	SES
2/25/2016	Draft plaintiffs' insert to Jae Jeong Joe joint letter brief. Research same.	3	605	\$1,815.00	L311	SES
2/25/2016	Call with LG Chem regarding Jae Jeong Joe, phone policies and Hague Convention brief.	0.5	605	\$302.50	L390	SES
2/25/2016	Call with DAPs re joint letter brief on Jae Jeong Joe.	0.2	605	\$121.00	L120	SES
2/26/2016	Updated third party chart.	0.5	265	\$132.50	L210	JSD
2/26/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures; located and pulled exhibits; updated Scarlett declaration.	2.5	265	\$662.50	L210	JSD
2/26/2016	Proofed joint letter brief re Jae Jeong Joe.	1	265	\$265.00	L210	JSD
2/26/2016	Creating and sending Naoki Ikegami (Sanyo) depo chronology; Running targeted searches for Naoki Ikegami (Sanyo) hot documents.	8	125	\$1,000.00	L140	AE
2/26/2016	Edit requests and analyze discovery issues.	3.2	735	\$2,352.00	L390	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/26/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe (LGC); Reviewed documents and prepared summary outlines for potential LGC deponents YS Kim, Deuk Yong Kwon, Jang Won Huh, Jae Kil Kim, HK Ra, SH Kim, JM Lee.	8	125	\$1,000.00	L140	JWJ
2/26/2016	Draft plaintiffs' insert to Jae Jeong Joe joint letter brief. Research same.	1	605	\$605.00	L311	SES
2/29/2016	At Panasonic's request, checked computer and shared server to confirm whether they contain privileged document.	0.2	350	\$70.00	L140	JC
2/29/2016	Attended call with KP (of SG) and LC (co-leads in case) regarding class rep status for demonstrative evidence to be submitted for Magistrate Judge Ryu.	0.5	420	\$210.00	L120	CLC
2/29/2016	Attended call with DL and LC (co-leads in case) regarding class rep status for demonstrative evidence to be submitted for Magistrate Judge Ryu.	0.7	420	\$294.00	L120	CLC
2/29/2016	Conducted factual research from record, plaintiffs' interrogatory responses, and previous motions filed to help co-leads prepare demonstrative evidence for hearing before Magistrate Judge Ryu.	4.5	420	\$1,890.00	L110	CLC
2/29/2016	Prepared for call regarding status of class reps to help co-leads prepare demonstrative evidence for hearing before Magistrate Judge Ryu.	1	420	\$420.00	L110	CLC
2/29/2016	Formatted and proofed joint letter brief re the Hague Procedures.	2	265	\$530.00	L210	JSD
2/29/2016	Proofed joint letter re Jae Jeong Joe and circulated the same to defense counsel.	2.5	265	\$662.50	L210	JSD
2/29/2016	Downloaded depo exhibits and updated exhibit chart.	3	265	\$795.00	L390	JSD
2/29/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding and sending hot documents.	8	125	\$1,000.00	L140	AE
2/29/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	9	125	\$1,125.00	L140	JWJ
2/29/2016	Downloaded the HML-P translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
2/29/2016	Update case file; deposition preparation.	1.4	265	\$371.00	L330	BRM
2/29/2016	Confirming Panasonic requested claw back document was not stored electronically - 0.1.	0.1	325	\$32.50	L140	PAR
3/1/2016	Attended Plaintiff John Kopp deposition telephonically.	4.5	420	\$1,890.00	L330	CLC
3/1/2016	Conducted factual research on status of class reps in order to help prepare demonstrative evidence (chart) for hearing.	0.9	420	\$378.00	L120	CLC
3/1/2016	Proofed, fact-checked and autocited plaintiffs' insert to the joint letter brief re Jae Joe Jeong deposition.	2	265	\$530.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/1/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures and Scarlett Declaration and arranged the exhibits thereto, and exchanged the same with defense counsel.	2	265	\$530.00	L210	JSD
3/1/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	8	125	\$1,000.00	L140	AE
3/1/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	7	125	\$875.00	L140	JWJ
3/1/2016	Downloaded the HML-P translation documents from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/1/2016	Update case file; process document productions; confirm destruction of inadvertently produced document.	1.3	265	\$344.50	L140	BRM
3/1/2016	Read depositions of defendants.	3.1	575	\$1,782.50	L330	JCP
3/1/2016	Draft joint letter requesting emergency relief in the form of order requiring Jae Jeong Joe (LCG witness) to appear for deposition.	3.5	605	\$2,117.50	L330	SES
3/2/2016	Reviewed correspondence and filings regarding requests for production and objections.	1	420	\$420.00	L120	CLC
3/2/2016	Met with Batteries co-leads, JF, and SES regarding update on hearing.	0.3	420	\$126.00	L120	CLC
3/2/2016	Proofed, fact-checked and autocited plaintiffs' insert to the joint letter brief re Jae Joe Jeong deposition and efiled the same; prepared courtesy copy for the court.	3	265	\$795.00	L210	JSD
3/2/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	8	125	\$1,000.00	L140	AE
3/2/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/2/2016	Downloaded the translation documents of HML-P and PANA from LCHB and saved in the Batteries shared folder; Put new LIB production documents of HML-P and LGC-MDL into the right collections in Catalyst.	0.5	150	\$75.00	L140	CL
3/2/2016	Update case file.	0.6	265	\$159.00	L140	BRM
3/2/2016	Confer with JF and SES re case assignments.	0.6	575	\$345.00	L120	JCP
3/2/2016	Draft joint letter requesting emergency relief in the form of order requiring Jae Jeong Joe (LCG witness) to appear for deposition. Oversaw filing of same.	2	605	\$1,210.00	L390	SES
3/3/2016	Proofed, fact-checked and quote-checked joint letter brief re the Hague Procedures and Scarlett Declaration, arranged the exhibits thereto, and efiled	2	265	\$530.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	the same.					
3/3/2016	Reading SH Kim depo notes; Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	8	125	\$1,000.00	L140	AE
3/3/2016	Prepared discovery letter to the court.	1.5	735	\$1,102.50	L390	JDF
3/3/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	7	125	\$875.00	L140	JWJ
3/3/2016	Downloaded the HML-P translation document from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/3/2016	Edit joint letter regarding procedures to obtain testimony of Kwak (LGC) via letters of request under the Hague Convention. Oversaw filing of same.	2	605	\$1,210.00	L390	SES
3/4/2016	Reviewed correspondence and filings regarding requests for production and objections.	0.6	420	\$252.00	L120	CLC
3/4/2016	Prepared courtesy copy of the joint letter brief re the Hague convention procedures, Scarlett Decl. and exhibits thereto for delivery to the court.	1	265	\$265.00	L120	JSD
3/4/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	8	125	\$1,000.00	L140	AE
3/4/2016	Edit requests and analyze discovery issues.	2.5	735	\$1,837.50	L390	JDF
3/4/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	4	125	\$500.00	L140	JWJ
3/4/2016	Put the LIB new production documents of PANA-C, PANA, PNA, SANYO-C, SANYO, and SNA into the right collections in Catalyst.	0.5	150	\$75.00	L140	CL
3/4/2016	Update case file; update production log; update case file.	2	265	\$530.00	L140	BRM
3/4/2016	Confer with SES re discovery disputes; research re same; review materials re same; confer with co-counsel re same; confer with defense counsel re same; draft letter brief re same.	7.6	575	\$4,370.00	L210	JCP
3/7/2016	LiB team meeting.	0.2	350	\$70.00	L140	JC
3/7/2016	Reviewed correspondence and filings regarding requests for production and objections.	0.5	420	\$210.00	L120	CLC
3/7/2016	Met with SES and doc review team in order to strategize for upcoming depositions and other discovery tasks.	0.5	420	\$210.00	L330	CLC
3/7/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents; weekly Batteries meeting.	2	125	\$250.00	L140	AE
3/7/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak; Attended meeting with SES.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/7/2016	Downloaded the HML-P translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/7/2016	Update case file; process document productions.	1.8	265	\$477.00	L140	BRM
3/7/2016	Research re discovery dispute; confer with co-counsel re same; draft letter brief re same.	6.5	575	\$3,737.50	L312	JCP
3/8/2016	Prepared reimbursement request for one of the class reps re deposition expenses.	0.6	265	\$159.00	L120	JSD
3/8/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding and sending hot documents.	8.5	125	\$1,062.50	L140	AE
3/8/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/8/2016	Showed Jerrod how to navigate through the LIB documents in Catalyst.	0.6	150	\$90.00	L140	CL
3/8/2016	Update case file.	0.7	265	\$185.50	L140	BRM
3/8/2016	Research re discovery dispute; draft letter brief re same; confer with co- counsel re same.	2.2	575	\$1,265.00	L312	JCP
3/8/2016	Attend discovery conference with M. Rizak, Carl Hammarskjold, Brian Clark re cell phone records. Confer with plaintiffs re joint motion to compel records, communicate with JCP re same.	0.3	605	\$181.50	L390	SES
3/8/2016	Review Sony settlement preliminary approval papers. Send comments to co- leads.	0.5	605	\$302.50	L210	SES
3/8/2016	Call with co-leads regarding strategy and case status.	0.5	605	\$302.50	L120	SES
3/8/2016	Prepare and select documents for deposition of Jae Jeong Joe (LGC).	1	605	\$605.00	L330	SES
3/9/2016	Update calendar of depositions.	0.4	265	\$106.00	L120	JSD
3/9/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding and sending hot documents.	8	125	\$1,000.00	L140	AE
3/9/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/9/2016	Deposition preparation; prepare potential exhibits for attorney review; update case file.	7.5	265	\$1,987.50	L140	BRM
3/9/2016	Confer with counsel and def counsel re discovery dispute; research re same; draft letter brief re same.	4.3	575	\$2,472.50	L210	JCP
3/10/2016	Work on deposition chronology for In Sang Jeon deposition.	8	350	\$2,800.00	L140	JC
3/10/2016	Contacted and communicated with to provide him with understanding of status in case and signing of verification.	0.6	420	\$252.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/10/2016	Prepared redline comparison of Blackberry protective order with that of Palladium protective order.	0.6	265	\$159.00	L390	JSD
3/10/2016	Reviewed Metz report for certain document production references.	2.5	265	\$662.50	L390	JSD
3/10/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	7	125	\$875.00	L140	AE
3/10/2016	Edit requests and analyze discovery issues.	2.2	735	\$1,617.00	L390	JDF
3/10/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/10/2016	Deposition preparation; update case file; process document productions.	4	265	\$1,060.00	L140	BRM
3/10/2016	Review Palladium subpoena and declaration.	0.5	605	\$302.50	L390	SES
3/10/2016	Review documents from Jae Jeong Joe personnel file.	0.5	605	\$302.50	L140	SES
3/11/2016	Work on deposition chronology for In Sang Jeon deposition.	5.6	350	\$1,960.00	L140	JC
3/11/2016	Emailed Joe Aronson regarding verification of discovery responses.	0.4	420	\$168.00	L120	CLC
3/11/2016	Communicated with Joe Aronson regarding verification of discovery responses.	0.6	420	\$252.00	L120	CLC
3/11/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	7.5	125	\$937.50	L140	AE
3/11/2016	Edit requests and analyze discovery issues.	1.5	735	\$1,102.50	L390	JDF
3/11/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/11/2016	Pulled out the LIB certified translation documents for production. Sent a zip file to Brian; Put the LIB new production documents of HML, NEC, LGC-MDL, PANA-C, and PANA into the right collections in Catalyst; Downloaded the HML-P translation documents from LCHB and saved in the Batteries shared folder.	2	150	\$300.00	L140	CL
3/11/2016	Update case file; organization of deposition materials; coordinate for destruction of inadvertently produced document; collection of certified translations per defendant request.	2.6	265	\$689.00	L140	BRM
3/11/2016	Email counsel re meet and confer; meet and confer; research re letter brief re phone subpoenas; draft insert re same.	2.7	575	\$1,552.50	L390	JCP
3/11/2016	Prepare for and attend discovery conference with LGC re text messages to Kwak.	0.3	605	\$181.50	L390	SES
3/14/2016	Reviewed RFPs to prepare for call with class members to walk through RFPs with each class member in order to comply with court's order.	1.1	420	\$462.00	L311	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/14/2016	Met with class rep endence n order to walk through RFPs in order to comply with the court's order.	0.5	420	\$210.00	L311	CLC
3/14/2016	Met with co-lead D.L (CPM) to determine status of whether to follow up with class reps, then followed up with Kevin Young, and set up meetings with other class reps to review RFPs in order to comply with court's orders.	0.3	420	\$126.00	L311	CLC
3/14/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents.	4.3	125	\$537.50	L140	AE
3/14/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/14/2016	Downloaded the final translation documents of SDI-B, LGC-MDL, and HML-P from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/14/2016	Update case file.	0.7	265	\$185.50	L140	BRM
3/15/2016	Met with in order to walk through RFPs with each class rep in order to double check that each class rep produced all documents as requested by defendants, which was ordered by the court.	0.6	420	\$252.00	L311	CLC
3/15/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents; learning how to use Juris, filling out time entries.	8	125	\$1,000.00	L140	AE
3/16/2016	Updated third party chart.	0.6	265	\$159.00	L390	JSD
3/16/2016	Updated calendar.	0.4	265	\$106.00	L120	JSD
3/16/2016	Running targeted searches for Naoki Ikegami (Sanyo) hot documents, coding hot documents, updating and sending depo memo; creating Mitsuru Honma (Sanyo) initial depo memo.	8.5	125	\$1,062.50	L140	AE
3/16/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/16/2016	Call with co-leads regarding discovery status and strategy.	1	605	\$605.00	L120	SES
3/17/2016	Reviewed the Fourth Consolidated Amended Complaint to verify each class members' purchases in anticipation of filing complaint.	3.5	420	\$1,470.00	L210	CLC
3/17/2016	Reviewed and edited Fourth Consolidated Amended Complaint.	3.5	420	\$1,470.00	L210	CLC
3/17/2016	Verified class representatives' purchases in anticipation of filing fourth consolidated amended complaint	1.7	420	\$714.00	L210	CLC
3/17/2016	Proofed Fourth Amended Consolidated Complaint.	1.5	265	\$397.50	L210	JSD
3/17/2016	Updated class rep. contact list.	1.5	265	\$397.50	L120	JSD
3/17/2016	Creating Mitsuru Honma (Sanyo) initial depo memo.	0.7	125	\$87.50	L140	AE
3/17/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	and SH Kwak.					
3/17/2016	Downloaded final translation documents of LGC-MDL and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/17/2016	Edit discovery letter brief.	0.3	575	\$172.50	L210	JCP
3/18/2016	Verified class representatives' purchases in anticipation of filing fourth consolidated amended complaint	4.5	420	\$1,890.00	L210	CLC
3/18/2016	Contacted class reps regarding filing of fourth consolidated complaint and update on status of case.	1.5	420	\$630.00	L210	CLC
3/18/2016	Prepared dismissal letters to the class reps.	4	265	\$1,060.00	L120	JSD
3/18/2016	Proofed Fourth Amended Consolidated Complaint and efiled the same.	2.5	265	\$662.50	L210	JSD
3/18/2016	Fact analysis.	2.2	735	\$1,617.00	L120	JDF
3/18/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/18/2016	Downloaded final translation documents of PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/18/2016	Update case file; download and process document productions; assist document reviewers regarding deposition preparation documents.	4.2	265	\$1,113.00	L140	BRM
3/18/2016	Review proposed fourth amended complaint edits.	2	605	\$1,210.00	L210	SES
3/20/2016	Draft plaintiffs' insert to joint letter re motion to compel deposition of Jae Jeong Joe and facts from personnel file.	1	605	\$605.00	L210	SES
3/21/2016	Answer to supervising attorney's question as to which LGE deponent should be deposed first.	2.8	350	\$980.00	L140	JC
3/21/2016	Tacked down counsels' contact information of particular class reps and sent follow up emails to all class reps or their counsel to serve them with complaint (FCAC) by looking up information, communicating with class counsel to make sure letters were not distributed, and drafting then sending emails to ensure that all class reps were served with all discovery.	1	420	\$420.00	L120	CLC
3/21/2016	Drafted letter to departing class representatives based on Apple-only purchases; circulated letter to co-leads for approval.	1.2	420	\$504.00	L311	CLC
3/21/2016	Searched for documents of class rep Matthew Ence's laptop for KP (at SG) that Matt Ence said were produced during his deposition, but that defendants have no record of, in order to send to defendants as part of discovery.	0.8	420	\$336.00	L311	CLC
3/21/2016	Updated dismissal letters to the class reps. and served the same.	2.5	265	\$662.50	L120	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
3/21/2016	Proofed, fact-checked and autocited plaintiffs' insert to the joint letter brief re Jae Joe Jeong deposition.	2.5	265	\$662.50	L210	JSD
3/21/2016	Searching for and deleting Pana/Sanyo claw back documents.	0.5	125	\$62.50	L140	AE
3/21/2016	Team strategy.	1.2	735	\$882.00	L120	JDF
3/21/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/21/2016	Checked and deleted the LIB privileged documents on working folders, Batteries shared folder, and emails; Downloaded the final translation documents of HML-P and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	2.1	150	\$315.00	L140	CL
3/21/2016	Update case file; assist with preparation of joint letter; review translations regarding deposition preparation and transfer to new review database.	3.5	265	\$927.50	L140	BRM
3/21/2016	Edit plaintiffs' insert to joint letter re motion to compel deposition of Jae Jeong Joe and facts from personnel file. Circulate to co-leads.	0.5	605	\$302.50	L210	SES
3/21/2016	Oversaw filing of joint letter re motion to compel deposition of Jae Jeong Joe and facts from personnel file.	0.8	605	\$484.00	L210	SES
3/21/2016	Call with MLL re plaintiffs' insert to joint letter re motion to compel deposition of Jae Jeong Joe and facts from personnel file and schedule to exchange.	0.1	605	\$60.50	L120	SES
3/22/2016	Communicated with co-leads and class reps regarding re-collection of data, drafted email to class reps on issue and worked on letter of dismissal to class representatives.	1.2	420	\$504.00	L311	CLC
3/22/2016	Reviewed letters of dismissal to class reps in anticipation of sending each departing class representative the letter.	0.8	420	\$336.00	L120	CLC
3/22/2016	Reviewed Leamer expert report, class cert papers, and batteries subpoena chart to find market share and number of subpoenas served in order to sent to SES to include in motions.	2.1	420	\$882.00	L210	CLC
3/22/2016	Prepared more dismissal letters to the class reps. and served the same.	2	265	\$530.00	L120	JSD
3/22/2016	Proofed, fact-checked and autocited plaintiffs' insert to the joint letter brief re Jae Joe Jeong deposition; prepared admin. motion to seal; redacted the public copy of the brief and efiled the same.	3.5	265	\$927.50	L210	JSD
3/22/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/22/2016	Checked and deleted the LIB privileged documents on working folders,	2	150	\$300.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Batteries shared folder, and emails.					
3/22/2016	Update case file; coordinate with document reviewers regarding destruction of inadvertently produced documents; review deposition preparation status.	2	265	\$530.00	L140	BRM
3/22/2016	Meet and confer re discovery dispute; research re same; draft letter brief re same.	2.8	575	\$1,610.00	L390	JCP
3/23/2016	Sent letters of dismissal to departing class representatives.	1.2	420	\$504.00	L120	CLC
3/23/2016	Searched Matt Ence's production to look for photo of box of purchase in preparation for amending his interrogatory responses, and communicated with team and Matt Ence to locate his documents (photo of computer boxes).	2.3	420	\$966.00	L311	CLC
3/23/2016	Updated dismissal letters to the class reps. and served the same.	1	265	\$265.00	L120	JSD
3/23/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/23/2016	Downloaded the final translation documents of LGC-MDL, TSB-LIB, HML- P, Herald news, and ET news from LCHB. Renamed and saved in the Batteries shared folder; Double checked on the LIB production claw back list on the Master Tracking List for final and informal chart.	0.9	150	\$135.00	L140	CL
3/23/2016	Review defendant production original and backup media regarding inadvertently produced documents; update case file.	3.2	265	\$848.00	L140	BRM
3/23/2016	Research re discovery disputes; draft letter brief re same.	2.8	575	\$1,610.00	L312	JCP
3/24/2016	Answer to supervising attorney's question as to timeframe of preparing deposition chronologies.	0.5	350	\$175.00	L140	JC
3/24/2016	Sent letters of dismissal to departing class representatives.	0.4	420	\$168.00	L120	CLC
3/24/2016	Verified correct class members were being dropped for SES to include in stipulation and read and reviewed stipulation.	0.5	420	\$210.00	L210	CLC
3/24/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/24/2016	Downloaded final translation documents of LGC-MDL, TSB-LIB, Sanyo, and a set of translations for deposition. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
3/24/2016	Update case file; assist with preparation and service of discovery on defendants; continue review of defendant production media regarding inadvertently produced documents.	4.2	265	\$1,113.00	L140	BRM
3/24/2016	Research re discovery disputes; draft letter brief re same.	2.3	575	\$1,322.50	L312	JCP
3/25/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	and SH Kwak.					
3/25/2016	Update case file; continue review of defendant productions regarding inadvertently produced documents; update case calendar; deposition preparation.	2	265	\$530.00	L140	BRM
3/28/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/29/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/29/2016	Work on draft notices and discuss same with SES.	2.5	605	\$1,512.50	L160	CAO
3/29/2016	Research re discovery dispute; edit joint letter brief re same.	1.3	575	\$747.50	L312	JCP
3/30/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/30/2016	Downloaded the final translation documents of PANA and Sony from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
3/30/2016	Work on draft notices and discuss same with SES.	2	605	\$1,210.00	L160	CAO
3/30/2016	Research re discovery dispute; edit joint letter brief re same.	1.3	575	\$747.50	L312	JCP
3/30/2016	Call with co-leads re discovery and strategy.	0.5	605	\$302.50	L120	SES
3/31/2016	Work on deposition outline for In-sang Jeon deposition.	10	350	\$3,500.00	L140	JC
3/31/2016	Emailed all class reps with all discovery in order to help co-leads and to ensure that all class reps received all discovery in anticipation of making this point in front of judge at future hearings.	0.7	420	\$294.00	L120	CLC
3/31/2016	Reviewed documents and prepared deposition chronology for Jae Jeong Joe and SH Kwak.	8	125	\$1,000.00	L140	JWJ
3/31/2016	Call with Mollie re Jae Jeung Joe deposition. Edit stipulation from LGC re same. Communicate with co-leads regarding stipulation and deposition.	0.5	605	\$302.50	L390	SES
4/1/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	8	350	\$2,800.00	L140	JC
4/1/2016	Review Sanyo0552871 and search for the location of the meeting - 1.6.	1.6	350	\$560.00	L140	HH
4/1/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/1/2016	Downloaded the final translation documents of TSB-LIB and PANA from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/1/2016	Update case file; update case calendar.	1.2	265	\$318.00	L140	BRM
4/4/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/4/2016	Downloaded final translation documents of PANA and HML-P from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/4/2016	Assist co-counsel with class representative production issues; update case file.	2.1	265	\$556.50	L140	BRM
4/5/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	8	350	\$2,800.00	L140	JC
4/5/2016	Reviewed docket and updated service list.	1	265	\$265.00	L120	JSD
4/5/2016	Calendared due dates.	0.3	265	\$79.50	L120	JSD
4/5/2016	Attn. expert.	2.5	735	\$1,837.50	L130	JDF
4/5/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/5/2016	Update case file; process document productions.	1.5	265	\$397.50	L140	BRM
4/6/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	10	350	\$3,500.00	L140	JC
4/6/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/6/2016	Downloaded LIB final translation documents of P-DOJ, PANA-C, and HML-P. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/6/2016	Update case file.	1	265	\$265.00	L140	BRM
4/6/2016	Review documents and draft memo to file re upcoming witness depositions.	9	605	\$5,445.00	L330	SES
4/7/2016	Reviewed local rules re timing of the response to motion for relief pretrial order of magistrate judge.	0.7	265	\$185.50	L120	JSD
4/7/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/7/2016	Downloaded LIB final translation documents of PANA and saved in the Batteries shared folder; Searched for the LIB-SDI exhibits. Downloaded and sent to Shana.	1.8	150	\$270.00	L140	CL
4/7/2016	Update case file; assist attorneys with issue/document requests.	1.2	265	\$318.00	L140	BRM
4/7/2016	Confer with SES re pass-through issues.	1	575	\$575.00	L311	JCP
4/7/2016	Prepare for deposition of IS Jeon.	2	605	\$1,210.00	L330	SES
4/7/2016	Telephone call with AMS re deposition of DS Lee (SDI). Review documents for deposition.	2	605	\$1,210.00	L330	SES
4/7/2016	Confer with JCP re third party data calls. Follow up with third parties regarding outstanding subpoenas.	2	605	\$1,210.00	L311	SES
4/7/2016	Email co-leads re Sawai deposition.	0.3	605	\$181.50	L330	SES
4/8/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	8.3	350	\$2,905.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/8/2016	Tracked down information on whether IPPs had data from Office Depot and whether IPPs had used it to analyze pass through for SES in anticipation of call with Office Depot.	0.5	420	\$210.00	L140	CLC
4/8/2016	Updated third party subpoena chart.	0.8	265	\$212.00	L390	JSD
4/8/2016	Formatted letters to third parties following up on the subpoena; mailed the same.	2.2	265	\$583.00	L390	JSD
4/8/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/8/2016	Downloaded LIB final translation documents of LGC-MDL and PANA. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/8/2016	Confirm deletion of inadvertently produced defendant production documents; process document production; update case file; review third- party productions.	2.7	265	\$715.50	L140	BRM
4/8/2016	Review materials re pass-thru; confer with SES re same; draft letter to third parties re subpoenas.	1.2	575	\$690.00	L390	JCP
4/11/2016	LiB team meeting (.60); Work on deposition outline for In-sang Jeon (LG Chem deponent) (3.20); Answer to supervising attorney's question re. the role of LGC division (Business Planning) (2.00).	5.8	350	\$2,030.00	L140	JC
4/11/2016	Reading Michinori Sawai (Hitachi) depo report.	0.3	125	\$37.50	L330	AE
4/11/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search; attended meeting with SES.	8	125	\$1,000.00	L140	JWJ
4/11/2016	Downloaded the LIB final translation of SDI-B documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/11/2016	Deposition preparation; update case file.	1.6	265	\$424.00	L330	BRM
4/12/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	8	350	\$2,800.00	L140	JC
4/12/2016	Formatted and proofed letter rescheduling deposition dates and served the same.	1	265	\$265.00	L330	JSD
4/12/2016	Prepared notice of depositions.	1.5	265	\$397.50	L330	JSD
4/12/2016	Formatted and proofed letter to defense counsel.	1	265	\$265.00	L210	JSD
4/12/2016	Update case file; assist attorneys with issue and document requests.	1.3	265	\$344.50	L140	BRM
4/12/2016	Confer with SES re third party discovery requests; correspond with third parties re same.	0.8	575	\$460.00	L311	JCP

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/12/2016	Call with SDI re deposition of DS Lee. Follow up call with DPPs re same and deposition strategy.	1	605	\$605.00	L330	SES
4/13/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	12.9	350	\$4,515.00	L140	JC
4/13/2016	Calendared due dates.	0.5	265	\$132.50	L120	JSD
4/13/2016	Review SANYO0553129 and provide additional comment; search online regarding the status of Pinxuan Restaurant; and respond to additional questions from Hisun9.	0.9	350	\$315.00	L140	НН
4/13/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/13/2016	Downloaded the LIB final translation documents of Sony-LIB, PANA-C, and SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/13/2016	Attend deposition of Dong Sub (Ignacio) Lee, SDI witness.	9	605	\$5,445.00	L330	SES
4/14/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	6.7	350	\$2,345.00	L140	JC
4/14/2016	Attend to document productions; coordinated with Catalyst for their upload, and facilitated their upload to the database.	2.5	265	\$662.50	L140	JSD
4/14/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/14/2016	Updated LIB new production documents on the Batteries Assignment chart; Put LIB new production document into collections in Catalyst.	1.5	150	\$225.00	L140	CL
4/14/2016	Attend deposition of Dong Sub (Ignacio) Lee, SDI witness.	7.5	605	\$4,537.50	L330	SES
4/15/2016	Work on deposition outline for In-sang Jeon (LG Chem deponent).	8.6	350	\$3,010.00	L140	JC
4/15/2016	Downloaded document productions.	0.7	265	\$185.50	L140	JSD
4/15/2016	Researching employment status of Hitoshi Ouchi (Sanyo/Tocad).	1	125	\$125.00	L140	AE
4/15/2016	Attn. expert deposition.	4	735	\$2,940.00	L330	JDF
4/15/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/15/2016	Downloaded final translation of PANA, PANA-C, and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/15/2016	Draft summary of testimony of Dong Sub (Ignacio) Lee; circulate to co-leads with comment on deposition.	1.5	605	\$907.50	L330	SES
4/18/2016	LiB team meeting.	0.4	350	\$140.00	L140	JC
4/18/2016	Formatted and proofed requests for production of documents and served the same.	0.7	265	\$185.50	L311	JSD
4/18/2016	Attn. expert.	3.5	735	\$2,572.50	L130	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/18/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search; attended meeting with SES.	8	125	\$1,000.00	L140	JWJ
4/18/2016	Checked the LIB – IS Jeon translation documents and sent to Shana.	0.7	150	\$105.00	L140	CL
4/18/2016	Prepare for deposition of IS Jeon; review documents.	2.6	605	\$1,573.00	L330	SES
4/18/2016	Call with S. Scarlett and review attorneys re: LIB document review.	0.2	450	\$90.00	L120	MAS
4/19/2016	Attn. expert/discovery.	3.2	735	\$2,352.00	L130	JDF
4/19/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/19/2016	Assist with deposition preparation; update case file.	2.4	265	\$636.00	L330	BRM
4/19/2016	Research re response to Jae Jeong Joe motion for relief; draft response re same; confer with third parties re data production.	6.5	575	\$3,737.50	L390	JCP
4/19/2016	Prepare memorandum to R. Abrantes-Metz re deposition.	6.5	605	\$3,932.50	L330	SES
4/19/2016	Edit response to LGC's objection regarding Jae Jeong Joe deposition order.	0.5	605	\$302.50	L330	SES
4/20/2016	Created spreadsheet for third parties to contact in order to obtain class reps contact information by reviewing documents produced by third parties as a result of subpoena and market share.	2	420	\$840.00	L140	CLC
4/20/2016	Searched for date CB (class representative) documents were created for co- leads in anticipation of sending the responses to the defendants based on their requests.	0.4	420	\$168.00	L312	CLC
4/20/2016	Updated Batteries third party chart.	0.5	265	\$132.50	L390	JSD
4/20/2016	Prepared document production subpoenas and served the same.	2.5	265	\$662.50	L210	JSD
4/20/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/20/2016	Downloaded the LIB final translation documents of PANA-C and SDI-B from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/20/2016	Update case file.	0.6	265	\$159.00	L140	BRM
4/20/2016	Draft response to Jae Jeong Joe motion; Research re same; confer with third parties re data production.	5.2	575	\$2,990.00	L390	JCP
4/20/2016	Edit response to LGC's objection regarding Jae Jeong Joe deposition order.	5.4	605	\$3,267.00	L330	SES
4/20/2016	Call with A. Sheanin re deposition protocol and Jae Jeong Joe brief.	1	605	\$605.00	L330	SES
4/21/2016	Reviewed third party subpoena chart and researched companies in chart in order to determine whether they should be contacted to obtain class member contact information in order to provide notice to the class of settlement.	4.2	420	\$1,764.00	L140	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/21/2016	Reviewed BS (class representative) interrogatory responses with him in order to ensure that all class representatives are aware of ongoing discovery, as required by the court.	0.2	420	\$84.00	L312	CLC
4/21/2016	Reviewed class representatives' interrogatory responses in anticipation of discussing their responses with each class representative in order to ensure that all class reps are aware of ongoing discovery, as required by the court.	0.5	420	\$210.00	L312	CLC
4/21/2016	Prepared subpoenas for production of documents to third parties.	1.5	265	\$397.50	L210	JSD
4/21/2016	Formatted and proofed opposition to motion for relief from nondispositive pretrial order of magistrate judge.	2.5	265	\$662.50	L210	JSD
4/21/2016	Updated calendar.	0.3	265	\$79.50	L120	JSD
4/21/2016	Edit requests and analyze discovery issues.	3.2	735	\$2,352.00	L390	JDF
4/21/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/21/2016	Downloaded the LIB final translation documents of PANA-C and HML-P from LCHB; Renamed and saved in the Batteries shared folder; Pulled out the LIB translation and original documents for Experts and sent to Brian.	4	150	\$600.00	L140	CL
4/21/2016	Deposition preparation; update case file.	1.4	265	\$371.00	L330	BRM
4/21/2016	Deposition preparation; update case file.	5	265	\$1,325.00	L330	BRM
4/21/2016	Confer with third parties re data production; finalize draft response to Jae Jeong Joe motion.	2.6	575	\$1,495.00	L390	JCP
4/22/2016	Met with class rep JK in order to walk through his interrogatory response and obtain his signed verification in anticipation of sending to defendants.	0.2	420	\$84.00	L312	CLC
4/22/2016	Reviewed class representative JK's interrogatory responses.	0.3	420	\$126.00	L312	CLC
4/22/2016	Updated Batteries third party chart.	0.5	265	\$132.50	L120	JSD
4/22/2016	Updated subpoenas for production of documents to third parties and served the same.	1.5	265	\$397.50	L210	JSD
4/22/2016	Attn. expert preparation.	3.2	735	\$2,352.00	L130	JDF
4/22/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/22/2016	Downloaded the LIB final translation of PNA and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/22/2016	Confer with third parties re data production; confer with SES re same.	2.1	575	\$1,207.50	L390	JCP
4/25/2016	Review of LGC documents to see whether they are hot documents at a supervising attorney's request.	0.6	350	\$210.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/25/2016	Contacted third parties regarding production of class members' contact information so that IPPs can provide notice of settlement to class.	0.5	420	\$210.00	L311	CLC
4/25/2016	Expert prep. analysis.	3.5	735	\$2,572.50	L130	JDF
4/25/2016	Downloaded the LIB - final translation of SNA and PANA-C from LCHB. Saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/25/2016	Process document productions; update case file.	1.5	265	\$397.50	L140	BRM
4/25/2016	Confer with third parties re data production; confer with def counsel re meet and confer on discovery disputes.	2.3	575	\$1,322.50	L390	JCP
4/25/2016	Call with non-party Cornwell re data.	0.2	605	\$121.00	L390	SES
4/26/2016	Set up WebEx meeting for JCP; attended to attorney's requests.	0.5	265	\$132.50	L120	JSD
4/26/2016	Audited document production by third parties and updated the document production chart.	2.5	265	\$662.50	L140	JSD
4/26/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/26/2016	Update case file and production logs; assist attorneys with document requests.	1	265	\$265.00	L140	BRM
4/26/2016	Review production data from third parties; draft discovery re same; confer with outside counsel re same; confer with SES re same.	5.3	575	\$3,047.50	L311	JCP
4/26/2016	Collect emails from third parties for production to defendants.	1	605	\$605.00	L140	SES
4/26/2016	Attend deposition of Dr. Leamer (IPPs' class certification expert) remotely. Email JDF re same to prepare for deposition of R. Abrantes-Metz.	2.5	605	\$1,512.50	L330	SES
4/27/2016	Met with counsel for Office Max in order to discuss whether Office Max would provide class member contact information.	0.3	420	\$126.00	L390	CLC
4/27/2016	Reviewed documents produced by third parties in order to determine which third parties would likely provide class member contact information.	4.1	420	\$1,722.00	L140	CLC
4/27/2016	Audited document production by third parties and updated the document production chart.	4	265	\$1,060.00	L140	JSD
4/27/2016	Prepare IPP expert Dr. Abrantes-Metz in advance of deposition.	2.2	735	\$1,617.00	L130	JDF
4/27/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/27/2016	Downloaded the LIB - final translation documents of PANA, PANA-C and SNA from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/27/2016	Update case file; review third-party correspondence regarding production of same to defendants.	4.5	265	\$1,192.50	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
4/28/2016	Audited document production by third parties and updated the document production chart.	2	265	\$530.00	L140	JSD
4/28/2016	Calendared due dates.	0.5	265	\$132.50	L120	JSD
4/28/2016	Defend deposition of IPP expert Dr. Abrantes-Metz.	10	735	\$7,350.00	L330	JDF
4/28/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/28/2016	Downloaded the LIB - final translation documents of PANA-C from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
4/28/2016	Update case file; assist with deposition preparation.	1.5	265	\$397.50	L330	BRM
4/28/2016	Confer with def counsel re discovery disputes.	0.8	575	\$460.00	L311	JCP
4/28/2016	Attend hearing regarding production of downstream data; confer with DPPs re same.	3	605	\$1,815.00	L230	SES
4/29/2016	Formatted and proofed letter to defense counsel.	1	265	\$265.00	L210	JSD
4/29/2016	Write up re deposition.	2.2	735	\$1,617.00	L330	JDF
4/29/2016	Reviewed documents and prepared deposition chronologies for JJ Joe, In Sang Jeon (or In Sang Jun) and LGC oversea Japan employee search.	8	125	\$1,000.00	L140	JWJ
4/29/2016	Downloaded the LIB final translation documents of SDI-B, SANYO, PANA and PANA-C from LCHB. Renamed and saved in the Batteries shared folder. Checked the LIB - certified translation documents and exhibits for IS Jeon deposition and sent to Shana.	1.2	150	\$180.00	L140	CL
4/29/2016	Deposition preparation; update case file; process document productions.	3.1	265	\$821.50	L330	BRM
4/29/2016	Prepare for deposition of IS Jeon. Review documents and create outline.	4	605	\$2,420.00	L330	SES
4/29/2016		2	605	\$1,210.00	L210	SES
4/29/2016	Collect emails from third parties for production to defendants.	1	605	\$605.00	L140	SES
5/2/2016	Reviewed WOJ invoices.	0.7	265	\$185.50	L120	JSD
5/2/2016	Downloaded transcripts and exhibits and renamed exhibits according to convention.	3	265	\$795.00	L120	JSD
5/2/2016	Located and pulled discovery documents.	1	265	\$265.00	L390	JSD
5/2/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/2/2016	Downloaded the LIB - final translation of SDI-B and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/2/2016	Confer with co-counsel and def counsel re discovery disputes; review discovery requests.	1.4	575	\$805.00	L311	JCP
5/3/2016		1.5	265	\$397.50	L210	JSD
5/3/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/4/2016	Update third party meet and confer chart.	2	265	\$530.00	L390	JSD
5/4/2016	Attn fact investigation.	3.2	735	\$2,352.00	L110	JDF
5/4/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/4/2016	Review defendant production original media regarding production deficiencies; update case file.	2.5	265	\$662.50	L140	BRM
5/4/2016	Draft discovery requests to third parties; confer with third parties re same and re deposition dates.	1	575	\$575.00	L311	JCP
5/4/2016	Attend Circuit City 30(b)(6) deposition by telephone.	4	450	\$1,800.00	L330	MAS
5/4/2016	Participate telephonically in 30(b)(6) deposition of Circuit City.	4	450	\$1,800.00	L330	MAS
5/5/2016	Reviewed Best Buy productions to determine whether Best Buy produced class member contact information or SKUs, then drafted and send email to counsel for Best Buy requesting class member contact information.	1.1	420	\$462.00	L140	CLC
5/5/2016	Searched docket and case file for Protective Order in anticipation of sending to Vanessa Powers of Amazon for her review in anticipation of obtaining class member contact information.	0.5	420	\$210.00	L160	CLC
5/5/2016	Investigated third party entities, locations for subpoena purposes.	3	265	\$795.00	L390	JSD
5/5/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/5/2016	Downloaded the LIB - final translation documents of P-DOJ, TSB-LIB, PANA and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
5/5/2016	Appear for deposition of Circuit City 30(b)(6) witness.	7.5	450	\$3,375.00	L330	MAS
5/5/2016	Attend telephonically deposition of Circuit City 30(b)(6) witness.	7.5	450	\$3,375.00	L330	MAS
5/6/2016	Reviewed WOJ invoices and submit to co-counsel for payment and processing.	1.5	265	\$397.50	L120	JSD
5/6/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/6/2016	Downloaded the LIB - final translation documents of SANYO-C and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
5/9/2016	LiB team meeting.	0.1	350	\$35.00	L140	JC
5/9/2016		1.5	265	\$397.50	L210	JSD
5/9/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/9/2016	Downloaded the LIB - final translation document of PANA from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
5/9/2016	Process document production; update case file.	1.2	265	\$318.00	L140	BRM
5/9/2016	Confer with third parties re subpoena response; draft discovery requests re same; update chart re same; investigate third parties for compliance with subpoenas.	3.3	575	\$1,897.50	L311	JCP
5/9/2016	Prepare for IS Jeon (LGC) deposition. Draft outline and select exhibits.	7.5	605	\$4,537.50	L330	SES
5/9/2016	Conference call with reviewers re document review assignments and upcoming depositions.	0.5	605	\$302.50	L120	SES
5/10/2016	Reviewed Amazon and Best Buy data productions to determine how best to provide SKUs requested by counsel; emailed SES re same.	1.2	420	\$504.00	L160	CLC
5/10/2016	Prepared notice of appearance for MAS.	0.5	265	\$132.50	L210	JSD
5/10/2016	Format, proofed and served JP letter to counsel re third party production.	1.5	265	\$397.50	L390	JSD
5/10/2016	Prepared cross-notice of subpoena for MEI, Attachment A thereto and served the same.	1.5	265	\$397.50	L390	JSD
5/10/2016	Attn. discovery.	1.5	735	\$1,102.50	L311	JDF
5/10/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/10/2016	Put the LIB new production documents of LG Chem, Panasonic, Sanyo, and Samsung SDI into collections.	0.5	150	\$75.00	L140	CL
5/10/2016	Confer with third parties re subpoena response; draft discovery requests re same; update chart re same; investigate third parties for compliance with subpoenas; confer with SES re same.	3.2	575	\$1,840.00	L311	JCP
5/11/2016	Updated third party chart.	0.7	265	\$185.50	L390	JSD
5/11/2016	Prepared notice of subpoenas/subpoenas to third parties and Attachment thereto and served the same.	2	265	\$530.00	L390	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/11/2016	Downloaded exhibits; reviewed transcripts to identify party who introduced exhibits and updated master deposition exhibit chart.	0.4	265	\$106.00	L330	JSD
5/11/2016	Call with co-counsel.	0.5	735	\$367.50	L120	JDF
5/11/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/11/2016	Update case file; update production logs.	1	265	\$265.00	L140	BRM
5/11/2016	Research re third party production; confer with SES re same; draft correspondence and discovery requests to def counsel; meet and confer re same.	3.5	575	\$2,012.50	L311	JCP
5/11/2016	Review deposition transcript of Roger Noll.	1.8	605	\$1,089.00	L140	SES
5/11/2016	Call with Dell re subpoena.	0.2	605	\$121.00	L390	SES
5/11/2016	Read discovery letter brief regarding production of phone records for motion <u>for protective order hearing</u> before Judge Ryu.	0.3	450	\$135.00	L140	MAS
5/12/2016		1.2	265	\$318.00	L210	JSD
5/12/2016	Prepared notice of subpoenas/subpoenas to third parties and Attachment thereto; served the same.	2.5	265	\$662.50	L390	JSD
5/12/2016	Attn fact discovery.	2.5	735	\$1,837.50	L311	JDF
5/12/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/12/2016	Deposition preparation; update case file; process document production for loading.	1.8	265	\$477.00	L140	BRM
5/12/2016	Attend hearing on motion to quash subpoena for production of phone records.	1	450	\$450.00	L230	MAS
5/13/2016	Prepared notice of depositions and served the same.	1.5	265	\$397.50	L390	JSD
5/13/2016	Reviewed sealing requests for the Learner report.	2.6	265	\$689.00	L210	JSD
5/13/2016	Coordinated with vendors re deposition coverage.	0.6	265	\$159.00	L330	JSD
5/13/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/13/2016	Research re third party production; confer with S. Scarlett re same; draft correspondence and discovery requests to def counsel; meet and confer re same.	1.1	575	\$632.50	L311	JCP
5/13/2016	Prepare for deposition of Jae Jeong Joe (LGC). Review documents, select exhibits and review documents.	6	605	\$3,630.00	L330	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/16/2016	Prepared and efiled transcript order; coordinated with court reporter/accounting. re payment.	0.7	265	\$185.50	L120	JSD
5/16/2016		1.5	265	\$397.50	L210	JSD
5/16/2016	Prepared notice of subpoenas/subpoenas and revised attachment thereto; served the same.	2.5	265	\$662.50	L390	JSD
5/16/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC); Attended meeting with SES.	8	125	\$1,000.00	L140	JWJ
5/16/2016	Pulled out the LIB – Jeon documents for deposition; Downloaded the LIB final translation documents of PANA and saved in the Batteries shared folder.	1.1	150	\$165.00	L140	CL
5/16/2016	Research re third party production; confer with SES re same; draft correspondence and discovery requests to def counsel.	0.7	575	\$402.50	L311	JCP
5/16/2016	Research extent of obligation to identify date on which documents will be produced under FRCP 34.	0.5	450	\$225.00	L312	MAS
5/17/2016	Contacted third parties for production of class member contact information.	0.5	420	\$210.00	L120	CLC
5/17/2016	Prepared notice of subpoenas/subpoenas and revised attachment thereto.	2	265	\$530.00	L390	JSD
5/17/2016	Prepare for deposition of In Sang Jeon (SDI).	10	735	\$7,350.00	L330	JDF
5/17/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/17/2016	Assist with deposition preparation; update case file.	4.2	265	\$1,113.00	L140	BRM
5/17/2016	Fact Research re third party subpoenas; draft discovery; confer with third parties re same; update chart re same.	4.2	575	\$2,415.00	L311	JCP
5/17/2016	Conference call with SDI re Jeon deposition.	0.1	605	\$60.50	L330	SES
5/18/2016	Reviewed Acer production, searching for evidence of pass through, in anticipation of including in reply class cert papers.	1.2	420	\$504.00	L260	CLC
5/18/2016	Prepared amended notice of subpoenas/subpoenas and revised attachment thereto; served the same.	5	265	\$1,325.00	L390	JSD
5/18/2016	Investigated third party company entities and locations.	3	265	\$795.00	L390	JSD
5/18/2016	Depose In Sang Jeon (SDI).	9.5	735	\$6,982.50	L330	JDF
5/18/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/18/2016	Put the LIB - new production documents of Hitachi Maxell into collections. Updated the Batteries Assignments – Master List.	0.5	150	\$75.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/18/2016	Review and organization of translations for addition to review database; update case file; deposition preparation.	6.5	265	\$1,722.50	L140	BRM
5/18/2016	Confer with SES re third party subpoenas; draft discovery requests re same; fact Research re same; update chart re same; confer with third parties re same.	6.3	575	\$3,622.50	L311	JCP
5/18/2016	Attend deposition of IS Jeon (SDI).	8.5	605	\$5,142.50	L330	SES
5/18/2016	Review outline for MEI deposition and send comments to S. Scarlett regarding pass-through.	0.3	450	\$135.00	L330	MAS
5/19/2016	Reviewed Acer documents and created Index for documents in order to determine whether documents of pass through existed to include in reply class cert papers.	2.5	420	\$1,050.00	L260	CLC
5/19/2016	Reviewed Acer production, looking for documents that could be used in class cert reply papers, showing that there was pass through, and incorporated them into an Index.	1.1	420	\$462.00	L140	CLC
5/19/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/19/2016	Pulled out the LIB – JJ Joe translation documents and sent to Shana; Downloaded the LIB – Exhibits from Brian link. Renamed and saved in the Batteries shared folder.	1.5	150	\$225.00	L140	CL
5/19/2016	Deposition preparation; audit of new database; review of translation files for addition to database; update case file; assist document reviewers.	9	265	\$2,385.00	L140	BRM
5/19/2016	Attend deposition of IS Jeon (SDI).	7.5	605	\$4,537.50	L330	SES
5/20/2016	Reviewed Acer production to determine what documents were produced and reviewed them for relevant documents to include in reply class cert papers, then incorporated them into an Index.	3.2	420	\$1,344.00	L140	CLC
5/20/2016	Contacted third parties and follow up by reviewing document productions and sending requested documents via hightail in order to seek class rep contact information to notify class of Sony settlement.	1.7	420	\$714.00	L120	CLC
5/20/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	7	125	\$875.00	L140	JWJ
5/20/2016	Downloaded the LIB - final translation documents of PANA and Pana-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
5/20/2016	Deposition preparation; update case file.	4.9	265	\$1,298.50	L140	BRM
5/20/2016	Draft discovery requests to third parties; confer with third parties re same;	2.2	575	\$1,265.00	L311	JCP

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	fact Research re same; update chart re same.					
5/20/2016	Prepare for deposition of Jae Jeong Joe (draft outline, select exhibits).	3	605	\$1,815.00	L330	SES
5/20/2016	Attend and question witness of MicroElectronics.	5	605	\$3,025.00	L330	SES
5/20/2016	Review deposition transcript of Stephen Deason.	0.5	450	\$225.00	L330	MAS
5/20/2016	Attend telephonically the 30(b)(6) deposition of Ritz Camera.	1.5	450	\$675.00	L330	MAS
5/22/2016	Continue translation database project; update case file.	2.4	265	\$636.00	L140	BRM
5/22/2016	Prepare for deposition of J. Joe (LGC); prepare deposition outline and select exhibits.	5	605	\$3,025.00	L330	SES
5/23/2016	Review Sony settlement approval issues.	1	950	\$950.00	L160	SWB
5/23/2016	Drafted emails and contacted third parties regarding providing class member contact information.	3.5	420	\$1,470.00	L120	CLC
5/23/2016	Reviewed Acer documents for documents of pass through or that ODDs were a commodity and other relevant documents to include in reply class cert papers, then included all documents in an index with bates numbers and relevance.	2.1	420	\$882.00	L140	CLC
5/23/2016	Prepared notice of subpoenas/subpoenas and revised attachment thereto; served the same.	1	265	\$265.00	L390	JSD
5/23/2016	Attn settlement approval.	2	735	\$1,470.00	L160	JDF
5/23/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/23/2016	Downloaded the LIB final translation documents of SANYO, Sanyo-C, and Sony-LIB from LCHB. Renamed and saved in the Batteries shared folder; Checked the LIB – LG Chem translation documents for deposition.	4	150	\$600.00	L140	CL
5/23/2016	Deposition preparation; update case file.	5.5	265	\$1,457.50	L140	BRM
5/23/2016	Prepare for deposition of J. Joe (LGC); prepare deposition outline and select exhibits.	1	605	\$605.00	L330	SES
5/24/2016	Drafted summary chart regarding standing of class representatives.	0.5	420	\$210.00	L120	CLC
5/24/2016	Contacted third parties regarding production of class rep contact information in order to update them on developments of case and the implications of the court granting preliminary approval.	2.1	420	\$882.00	L120	CLC
5/24/2016	Met and conferred with Jessica Mason of Office Depot in anticipation of having class rep contact information produced.	0.5	420	\$210.00	L120	CLC
5/24/2016	Downloaded exhibits and renamed the same according to convention; saved transcripts to case file.	2	265	\$530.00	L390	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/24/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/24/2016	Downloaded the LIB final translation documents of LGC-MDL and PANA- C from LCHB. Renamed and saved in the Batteries shared folder; Downloaded the LIB - Hitachi Maxell production documents of MXT- 000001-234 for Jerrod to review.	0.4	150	\$60.00	L140	CL
5/24/2016	Assist attorneys with document requests; update case file; deposition preparation.	4.3	265	\$1,139.50	L140	BRM
5/24/2016	Confer with third party counsel re production of documents; fact Research re same; review chart re same; draft correspondence re same; review and prepare documents for production.	6.1	575	\$3,507.50	L390	JCP
5/24/2016	Prepare for deposition of J. Joe (LGC); prepare deposition outline and select exhibits.	3	605	\$1,815.00	L330	SES
5/25/2016	Call with DXL, co-lead counsel, regarding contacting third parties to determine which firms with take responsibility for each third party in anticipation of obtaining class member contact information.	0.4	420	\$168.00	L120	CLC
5/25/2016	Prepared binder for MAS re class cert papers.	3	265	\$795.00	L260	JSD
5/25/2016	Located third party entities, located appropriate place for document production; prepared subpoenas.	4	265	\$1,060.00	L390	JSD
5/25/2016	Call re settlement and strategy.	2.2	735	\$1,617.00	L120	JDF
5/25/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/25/2016	Downloaded the LIB final translation documents of SANYO, Pana-C, and LGC from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
5/25/2016	Assist with preparation of third-party communications production; download and organize class certification opposition papers; update case file.	3.5	265	\$927.50	L140	BRM
5/25/2016	Read opposition to class cert and accompanying declarations and expert reports.	5.8	575	\$3,335.00	L260	JCP
5/25/2016	Depose Jae Jeong Joe (LGC).	9	605	\$5,445.00	L330	SES
5/26/2016	Read Judge Gonzalez Rogers' order granting preliminary approval in anticipation of following up with third parties to inform them that preliminary approval was granted and to set deadline for producing class member contact information.	0.5	420	\$210.00	L160	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/26/2016	Researched company market share of third parties and included market share for each third party we have contacted into chart in anticipation of sending to DL of CPM (co-leads) in order to determine which third parties to prioritize in obtaining class member contact information.	2.2	420	\$924.00	L120	CLC
5/26/2016	Drafted follow up email to Sprint regarding production of class member contact information, collected documents requested by Sprint, such as preliminary approval papers and declarations.	0.5	420	\$210.00	L120	CLC
5/26/2016	Drafted follow up emails to Newegg, Office Depot, Sprint, and T-Mobile regarding production of contact information for class reps and sending them updates on developments in case.	1.6	420	\$672.00	L120	CLC
5/26/2016	Communicated with DXL regarding contacting third parties in order to stay up to date on status between the firms in anticipation of trying to obtain class member contact information to notify the class.	0.5	420	\$210.00	L120	CLC
5/26/2016	Prepared subpoenas; located third party entities.	0.8	265	\$212.00	L390	JSD
5/26/2016	Downloaded the LIB final translation documents of Pana-C and SANYO-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
5/26/2016	Update case file.	0.8	265	\$212.00	L140	BRM
5/26/2016	Read opposition to class cert and accompanying declarations and expert reports; confer with SES re depositions.	2.5	575	\$1,437.50	L260	JCP
5/26/2016	Attend deposition of Jae Jeong Joe (LGC) DAP and defense questioning.	5	605	\$3,025.00	L330	SES
5/27/2016	Contacted third parties for class member contact information; updated status chart and team.	2.1	420	\$882.00	L120	CLC
5/27/2016	Downloaded the LIB – Master Tracking List for CTs and Informals.	0.1	150	\$15.00	L140	CL
5/30/2016	Attn. fact discovery.	1.5	735	\$1,102.50	L311	JDF
5/31/2016	Finding of a Korean translator for interview of LG Chem whistleblower at a supervising attorney's request.	0.5	350	\$175.00	L140	JC
5/31/2016	Meeting re strategy.	2.5	735	\$1,837.50	L120	JDF
5/31/2016	Reviewed documents and prepared deposition chronologies for JJ Joe (LGC), Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
5/31/2016	Process document productions; download and organize class certification opposition papers; update case file; assist attorney with document review database credentials; review documents regarding supplemental plaintiff production of third-party communications; create set of documents for expert review.	2.8	265	\$742.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
5/31/2016	Review third party discovery; confer with third party counsel re same; draft correspondence re same.	4.7	575	\$2,702.50	L390	JCP
5/31/2016	Strategy meeting with LCHB and CPM.	3	605	\$1,815.00	L120	SES
5/31/2016	Discuss defendants' opposition to class certification with S. Scarlett.	0.3	450	\$135.00	L260	MAS
5/31/2016	Read the motion to exclude Dr. Abrantes-Metz.	0.5	450	\$225.00	L210	MAS
6/1/2016	Attn. fact development.	2.5	735	\$1,837.50	L110	JDF
6/1/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/1/2016	Process document production; update case file.	1	265	\$265.00	L140	BRM
6/1/2016	Confer with co-counsel re production of third party data; fact Research re same; draft correspondence re same.	2.2	575	\$1,265.00	L390	JCP
6/2/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/2/2016	Downloaded the LIB final translation documents of PANA, SANYO, TSB- LIB and SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/2/2016	Update case file; process third-party communications for production.	1.2	265	\$318.00	L140	BRM
6/2/2016	Confer with co-counsel re third party productions; fact Research re same; draft correspondence re same.	2.2	575	\$1,265.00	L390	JCP
6/2/2016	Review opposition brief and create outline of reply brief in support of class certification.	2.3	605	\$1,391.50	L210	SES
6/2/2016	Review reply brief and create outline.	2.3	605	\$1,391.50	L210	SES
6/2/2016	Research case law and write joint letter brief regarding the Tachihara deposition.	3	450	\$1,350.00	L210	MAS
6/2/2016	Review correspondence with Sanyo and cases cited therein regarding the Tachihara deposition.	1.5	450	\$675.00	L210	MAS
6/3/2016	Contacted third parties for class member contact information; updated status chart and team.	1.2	420	\$504.00	L120	CLC
6/3/2016	Contacted third parties for class member contact information; updated status chart and team.	3.4	420	\$1,428.00	L110	CLC
6/3/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/3/2016	Update case file.	0.4	265	\$106.00	L140	BRM
6/3/2016	Revise joint letter brief regarding Tachihara deposition.	0.3	450	\$135.00	L210	MAS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/3/2016	Research case law on good cause to reopen a deposition.	1	450	\$450.00	L110	MAS
6/6/2016	Reviewed LIB documents produced by third parties in order to determine which third parties had requested SKUs to send to them in order to more easily locate class member contact information in order to provide to the class.	0.7	420	\$294.00	L120	CLC
6/6/2016	Spoke with Gordon from Newegg regarding class member contact information and drafted email providing class definition and a follow up on the call in anticipation of obtaining class member contact information.	0.5	420	\$210.00	L120	CLC
6/6/2016	Call with JP in order to discuss his project for obtaining data from third parties and my project to obtain class member contact information so that we coordinate our efforts with regards to speaking with each third party.	0.5	420	\$210.00	L120	CLC
6/6/2016	Met with DL from CPM and JP regarding entities to subpoen for SKUs in order to coordinate efforts with requesting class member contact information from the same third parties.	0.3	420	\$126.00	L120	CLC
6/6/2016	Met with DL from CPM to update him on HB's progress for obtaining class member contact information in order to provide notice to class members.	0.2	420	\$84.00	L120	CLC
6/6/2016	Reviewed Defendants Opposition to Class Certification in anticipation for reviewing Dell documents to include in IPPs' reply papers.	1.2	420	\$504.00	L210	CLC
6/6/2016	Reviewed the Defendants' Opposition to Class Cert in anticipation of reviewing Dell documents for reply class cert papers.	1.6	420	\$672.00	L210	CLC
6/6/2016	Downloaded deposition exhibits and renamed exhibits to conform to naming conventions .	2	265	\$530.00	L390	JSD
6/6/2016	Took inventory of third party productions and updated third party chart.	3	265	\$795.00	L390	JSD
6/6/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/6/2016	Downloaded the LIB corrected translation document of PANA from LCHB. Renamed and saved in the Batteries shared folder; Downloaded the LIB exhibits on the US Legal Support site; Downloaded the exhibits that are not on the US Legal Support site from Jan's via Hightail link; Searched and checked for the LIB - John Oh (SDI) and Albert Kim (LGC) names in the previously marked exhibit documents.	6.5	150	\$975.00	L140	CL
6/6/2016	Update case file.	0.6	265	\$159.00	L140	BRM
6/6/2016	Confer with defense counsel re several discovery disputes; confer with team and co-leads re same; fact research re discovery disputes; draft correspondence re same.	4.6	575	\$2,645.00	L390	JCP

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/6/2016	Revise letter brief regarding Tachihara in response to comments from L. Chan.	2.5	450	\$1,125.00	L210	MAS
6/7/2016	Contacted third parties for class member contact information; updated status chart and team.	1.2	420	\$504.00	L210	CLC
6/7/2016	Contacted AT&T and Verizon for class member contact information.	1.2	420	\$504.00	L120	CLC
6/7/2016	Prepared notice and subpoenas for production of documents to third parties; served the same; updated third party chart.	4.5	265	\$1,192.50	L390	JSD
6/7/2016	Analysis of defendants' opposition to class certification.	3	735	\$2,205.00	L120	JDF
6/7/2016	Expert discussion.	2.2	735	\$1,617.00	L340	JDF
6/7/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/7/2016	Update case file.	0.9	265	\$238.50	L140	BRM
6/7/2016	Meet and confer re discovery disputes with counsel; fact research re same; draft correspondence re discovery disputes.	2.7	575	\$1,552.50	L390	JCP
6/8/2016	Spoke with Jessica Mason of Office Depot regarding production of class member contact information.	0.2	420	\$84.00	L120	CLC
6/8/2016	Reviewed class action settlement procedures in order to respond to Jessica Mason's (Office Depot) questions regarding class member contact information.	1.3	420	\$546.00	L210	CLC
6/8/2016	Reviewed preliminary approval papers and communicated with third parties regarding class member contact information.	1.2	420	\$504.00	L210	CLC
6/8/2016	Inventoried third party production and prepared chart of third party productions sent to expert.	2.5	265	\$662.50	L390	JSD
6/8/2016	Updated third party chart with meet and confer efforts.	1.5	265	\$397.50	L390	JSD
6/8/2016	Analysis of defendants' opposition to class certification.	3.2	735	\$2,352.00	L120	JDF
6/8/2016	Expert discussion.	1.5	735	\$1,102.50	L340	JDF
6/8/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/8/2016	Update case file; assist attorney with production status of third parties.	3	265	\$795.00	L140	BRM
6/8/2016	Confer with def counsel re discovery disputes; fact research re same; draft correspondence re same.	2.7	575	\$1,552.50	L390	JCP
6/8/2016	Review opposition brief and create outline of reply brief in support of class certification.	3	605	\$1,815.00	L210	SES
6/9/2016	Formatted and proofed opposition to defendants.' Daubert motion.	2	265	\$530.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/9/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/9/2016	Downloaded the LIB final translation documents of LGC-MDL, SANYO, PANA-C and SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/9/2016	Update case file; assist attorney with review of outstanding third party productions.	2.1	265	\$556.50	L140	BRM
6/9/2016	Prepare outline of reply brief in support of class certification; draft outline of <u>opposition to Daubert motion regarding Dr. Abrantes-Metz.</u>	1.5	605	\$907.50	L210	SES
6/9/2016		5	605	\$3,025.00	L390	SES
6/9/2016	Confer with SDI and AMS re SW Lee and Yo Ahn Oh documents.	0.5	605	\$302.50	L390	SES
6/9/2016	Review opposition to class certification.	0.5	450	\$225.00	L210	MAS
6/9/2016	Review motion to exclude Rosa Abrantes Metz testimony.	0.5	450	\$225.00	L210	MAS
6/9/2016	Meet with S. Scarlett regarding opposition to motion to exclude Abrantes Metz.	0.2	450	\$90.00	L210	MAS
6/9/2016	Research case law for opposition to motion to exclude Abrantes Metz.	3.2	450	\$1,440.00	L110	MAS
6/10/2016	Updated chart of third party productions sent to expert.	1	265	\$265.00	L120	JSD
6/10/2016	Located, pulled and printed documents for depo prep (Masunaga); prepared binder for MAS.	2.5	265	\$662.50	L330	JSD
6/10/2016		1.5	265	\$397.50	L390	JSD
6/10/2016	Researching Panasonic and Toshiba employees in hot doc.	1	125	\$125.00	L140	AE
6/10/2016	Class cert opposition analysis and strategy discussion.	2.2	735	\$1,617.00	L120	JDF
6/10/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI) and Albert Kim (LGC).	8	125	\$1,000.00	L140	JWJ
6/10/2016	Downloaded the LIB final translation documents of PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/10/2016	Audit of all third-party productions for use by experts; update case file.	3	265	\$795.00	L140	BRM
6/10/2016		7.5	605	\$4,537.50	L390	SES
6/10/2016	Research case law regarding motion to exclude Metz testimony.	2.5	450	\$1,125.00	L110	MAS
6/10/2016	Draft opposition to motion to exclude Metz testimony.	3	450	\$1,350.00	L210	MAS
6/10/2016	Review documents and create outline for Mitsunori Masunaga deposition.	1	450	\$450.00	L330	MAS
6/13/2016	LiB team meeting.	0.2	350	\$70.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/13/2016	Spoke with Jessica Mason of Office Depot regarding production of class member contact information.	0.4	420	\$168.00	L210	CLC
6/13/2016	Reviewed docket for administrative motion to file under seal defendants' opposition to class cert and looked for stipulation on when IPPs response is <u>due in anticipation of filing and drafting IPPs' response</u> .	1.5	420	\$630.00	L210	CLC
6/13/2016		1	265	\$265.00	L390	JSD
6/13/2016	Analysis of defendants' opposition to class certification.	1.2	735	\$882.00	L210	JDF
6/13/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI).	8	125	\$1,000.00	L140	JWJ
6/13/2016		0.2	605	\$121.00	L390	SES
6/13/2016	Write Masunaga deposition outline.	3	450	\$1,350.00	L330	MAS
6/13/2016	Review documents for Masunaga deposition.	1	450	\$450.00	L330	MAS
6/13/2016	Draft opposition to exclude Metz expert report.	2	450	\$900.00	L210	MAS
6/14/2016	Reviewed defendants' opposition to class cert, searching for plaintiffs' confidential information, in anticipation of drafting and filing IPPs' response to the defendants' motion to seal.	1.3	420	\$546.00	L210	CLC
6/14/2016	Located, pulled and printed documents for depo prep (Masunaga).	4	265	\$1,060.00	L330	JSD
6/14/2016	Analysis of defendants' opposition to class certification.	1	735	\$735.00	L120	JDF
6/14/2016	Prepare for deposition of Yo Ahn Oh (SDI).	2.2	735	\$1,617.00	L330	JDF
6/14/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI).	8	125	\$1,000.00	L140	JWJ
6/14/2016	Update case file; process document productions for loading into review database.	1.8	265	\$477.00	L140	BRM
6/14/2016	Draft correspondence to third parties re subpoena; confer with counsel re same; fact research re same.	2.2	575	\$1,265.00	L390	JCP
6/14/2016	Review Masunaga documents and outline Masunaga deposition.	3.5	450	\$1,575.00	L330	MAS
6/15/2016	Reviewed documents from MS for Masunaga deposition in anticipation of attending his deposition.	2.6	420	\$1,092.00	L210	CLC
6/15/2016	Researched issues raised by Jessica Mason of Office Depot regarding production of class member contact information.	2.1	420	\$882.00	L210	CLC
6/15/2016	Contacted non-parties T-Mobile, Verizon, Best Buy, and Newegg in order to determine whether they will be able to provide class member contact information.	0.6	420	\$252.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/15/2016	Audited third party productions and updated chart of third party productions sent to expert.	2.5	265	\$662.50	L390	JSD
6/15/2016	Formatted and proofed letter to defense counsel and served the same.	1.5	265	\$397.50	L390	JSD
6/15/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI).	8	125	\$1,000.00	L140	JWJ
6/15/2016	Downloaded the LIB final translation documents of PANA-C and P-DOJ from LCHB; Renamed and saved in the Batteries shared folder; Searched for the LIB previously marked exhibits for Yo Ahn (John) Oh deposition.	0.6	150	\$90.00	L140	CL
6/15/2016	Update case file.	0.8	265	\$212.00	L140	BRM
6/15/2016	Confer with third parties re subpoena; draft correspondence re same.	1.5	575	\$862.50	L390	JCP
6/15/2016	Edit opposition to Daubert motion regarding Dr. Abrantes-Metz.	1	605	\$605.00	L210	SES
6/15/2016	Prepare for deposition of Yo Ahn (John) Oh; select exhibits and draft outline.	2.4	605	\$1,452.00	L330	SES
6/15/2016	Draft letter to all defendants regarding watchlist and depositions; review documents and custodial files to select remaining deponents.	3.3	605	\$1,996.50	L390	SES
6/15/2016	Draft response to part II of motion to exclude Abrantes-Metz testimony.	2.5	450	\$1,125.00	L210	MAS
6/15/2016	Outline Masunaga deposition.	3.5	450	\$1,575.00	L330	MAS
6/15/2016	Review documents to use in Masunaga deposition.	1.5	450	\$675.00	L330	MAS
6/16/2016	Drafted emails to third parties to follow up on whether they could produce class member contact information.	1.6	420	\$672.00	L120	CLC
6/16/2016	Drafted and sent email to SES providing update on producing class rep contact information in order to provide notice to the class.	0.2	420	\$84.00	L120	CLC
6/16/2016	Reviewed Dell documents, searching for documents to include in IPPs' reply brief in support of class certification.	2.9	420	\$1,218.00	L140	CLC
6/16/2016	Reviewed MS's deposition outline and documents in anticipation of attending Masunaga deposition.	2.1	420	\$882.00	L330	CLC
6/16/2016	Reviewed MS's deposition outline and documents relied on in outline for the Masunaga deposition in anticipation of attending deposition.	1.6	420	\$672.00	L330	CLC
6/16/2016	Updated chart of third party productions sent to expert.	4	265	\$1,060.00	L390	JSD
6/16/2016	Creating Mitsunori Matsunaga (Sony) background memo.	1	125	\$125.00	L140	AE
6/16/2016	Prepare for deposition of Yo Ahn Oh (SDI).	2.3	735	\$1,690.50	L110	JDF
6/16/2016	Reviewed documents and prepared deposition chronologies for Yo Ahn (John) Oh (SDI).	4	125	\$500.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/16/2016	Downloaded the LIB final translation documents of PANA-C and LGC- MDL from LCHB. Renamed and saved in the Batteries shared folder; Checked the LIB - translation documents for deposition; Created the Metadata screenshots of the documents and sent to Shana.	1.6	150	\$240.00	L140	CL
6/16/2016	Update case file, case calendar.	0.9	265	\$238.50	L140	BRM
6/16/2016	Meet and confer with counsel re third party data; draft correspondence to counsel re same; fact research re same; update chart re same.	6.3	575	\$3,622.50	L390	JCP
6/16/2016	Prepare for deposition of Yo Ahn (John) Oh; select exhibits and draft outline.	2.7	605	\$1,633.50	L330	SES
6/16/2016	Revise and add documents to M. Masunaga outline.	1	450	\$450.00	L330	MAS
6/16/2016	Compare documents flagged for use at Masuanaga deposition with list of certified translations.	0.3	450	\$135.00	L330	MAS
6/16/2016	Review documents to use in M. Masunaga deposition.	2	450	\$900.00	L330	MAS
6/17/2016	Reviewed defendants' opposition to class cert, looking for information to designate as confidential in anticipation for filing IPPs' response to defendants' administrative motion to file under seal.	3.1	420	\$1,302.00	L210	CLC
6/17/2016	Reviewed Dell documents, looking for documents to include in IPPs' reply in support of class certification.	5.1	420	\$2,142.00	L140	CLC
6/17/2016	Creating Mitsunori Matsunaga (Sony) background memo.	3	125	\$375.00	L140	AE
6/17/2016	Settlement discussions.	1.2	735	\$882.00	L160	JDF
6/17/2016	Fact analysis re LG Chem.	2.2	735	\$1,617.00	L120	JDF
6/17/2016	Update case file; assist third party with data production.	1.2	265	\$318.00	L140	BRM
6/17/2016	Confer with counsel re third party production; draft correspondence re discovery dispute; legal Research re same.	3.5	575	\$2,012.50	L390	JCP
6/17/2016	Review third party data; call with J. Cieslak for Agilent subpoena. Call with M. McBurney re class contact information from HP. Create chart of third parties to call re data.	0.9	605	\$544.50	L390	SES
6/19/2016	Reviewed docket for stipulations and defendants' opposition to IPPs' motion for class cert papers in order to find confidential information from class representatives that would require sealing.	2.3	420	\$966.00	L210	CLC
6/20/2016	Drafted administrative IPPs' reply to defendants' motion to file under seal defendants' opposition to IPPs' motion for class certification.	0.8	420	\$336.00	L210	CLC
6/20/2016	Second chaired Masunaga deposition with MS.	9	420	\$3,780.00	L330	CLC
6/20/2016	Prepared for attending Masunaga deposition by reviewing MS's outline and exhibits in anticipation of second chairing at deposition.	1.1	420	\$462.00	L330	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/20/2016	Formatted and proofed opposition to motion to seal; prepared proposed order.	3.5	265	\$927.50	L210	JSD
6/20/2016	Prepare for deposition of Yo Ahn Oh (SDI).	4.5	735	\$3,307.50	L330	JDF
6/20/2016	Downloaded the LIB final translation documents of LGC-MDL, SDI-B, and Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/20/2016	Organization of third-party productions; distribute transactional data productions to experts; update case file; assist with deposition preparation.	3.5	265	\$927.50	L140	BRM
6/20/2016	Confer with third parties re subpoenas; draft correspondence re same; legal Research re motion to compel data from Walmart; draft brief re same.	6.5	575	\$3,737.50	L390	JCP
6/20/2016	Revise outline for M. Masunaga deposition.	3	450	\$1,350.00	L330	MAS
6/20/2016	Attend deposition of Mitsunori Masunaga.	7	450	\$3,150.00	L330	MAS
6/21/2016	Second chaired Masunaga deposition.	4	420	\$1,680.00	L330	CLC
6/21/2016	Printed additional exhibit for Masunaga deposition and prepared exhibit in folder in anticipation Masunaga deposition.	0.5	420	\$210.00	L330	CLC
6/21/2016	Reviewed Dell's response to defendants' motion to file under seal their opposition to class cert papers as well as defendants' class cert papers to understand which portions Dell requested filing under seal; edited IPPs' response to motion to seal.	3.4	420	\$1,428.00	L210	CLC
6/21/2016	Updated and proofed opposition to motion to seal, proposed order; arranged exhibits, and efiled the same.	2.5	265	\$662.50	L210	JSD
6/21/2016	Downloaded exhibit and renamed the same to conform to naming conventions; saved transcripts to case file.	2	265	\$530.00	L330	JSD
6/21/2016	Scouted and talked to Korean interpreters to attend witness interview in So. Cal.	2	265	\$530.00	L390	JSD
6/21/2016	Coordinated with translation vendor re translation documents for deposition.	0.5	265	\$132.50	L390	JSD
6/21/2016	Downloaded the LIB final translation documents of Sony-LIB, LGC-MDL, PANA-C, and P-DOJ from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/21/2016	Update case file; deposition preparation.	1.2	265	\$318.00	L140	BRM
6/21/2016	Confer with third parties re subpoenas; draft correspondence re same; legal Research re motion to compel data from Walmart; draft brief re same.	2.2	575	\$1,265.00	L390	JCP
6/21/2016	Read Nakae and Masunaga transcripts.	3	605	\$1,815.00	L330	SES
6/21/2016	Take and attend deposition of M. Masunaga.	4.5	450	\$2,025.00	L330	MAS
6/22/2016	Formatted and proofed JCP letter to counsel and served the same.	1.5	265	\$397.50	L390	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/22/2016	Prepared chart of DPPs for JCP.	0.5	265	\$132.50	L120	JSD
6/22/2016	Updated service list.	0.5	265	\$132.50	L120	JSD
6/22/2016	Coordinated with Korean interpreter re particulars of witness interview at So. Cal; conducted conflicts check.	1	265	\$265.00	L120	JSD
6/22/2016	Deposition preparation; update case file.	5.5	265	\$1,457.50	L140	BRM
6/22/2016	Confer with third parties re subpoenas; draft correspondence re same; legal Research re motion to compel data from Walmart; draft brief re same.	3.5	575	\$2,012.50	L390	JCP
6/22/2016	Attend deposition of Jangwon (Jack) Huh of LG Chem.	10.2	605	\$6,171.00	L330	SES
6/22/2016	Emails with S. Scarlett regarding Masunaga deposition.	0.2	450	\$90.00	L330	MAS
6/23/2016	Translation of interview acknowledgment re. former LG Chem employee interview.	3.7	350	\$1,295.00	L140	JC
6/23/2016	Reviewed docket to determine which documents were filed under seal in order to help JP determine whether IPPs can contact third parties named in defendants' opposition to class cert.	1.5	420	\$630.00	L210	CLC
6/23/2016	Formatted and proofed JCP letter to third parties counsel and served the same.	2	265	\$530.00	L390	JSD
6/23/2016	Prepared amended subpoenas for production of documents to third parties and served the same.	2.5	265	\$662.50	L390	JSD
6/23/2016	Prepare for deposition of Yo Ahn Oh (SDI).	6.5	735	\$4,777.50	L330	JDF
6/23/2016	Search the LIB database for documents reflecting Canon's role in the market? IIT reports/other public reports - 3.6.	3.6	350	\$1,260.00	L140	НН
6/23/2016	Downloaded the LIB final translation documents of LGC-MDL, SDI-B, and PANA from LCHB. Renamed and saved in the Batteries shared folder; Downloaded the LIB native spreadsheets and sent to Shana; Searched and sent the LIB - Certified translation document of LGC-MDL0070684-85E to Jan.	0.7	150	\$105.00	L140	CL
6/23/2016	Deposition preparation; prepare translations for review database.	4.3	265	\$1,139.50	L140	BRM
6/24/2016	Prepared for call with T-Mobile by reviewing preliminary approval papers, data already produced, and IPPs' initial subpoena in anticipation of explain terms of settlement.	0.6	420	\$252.00	L120	CLC
6/24/2016	Reviewed Dell production, searching for documents to include in reply class cert papers for SES.	3.9	420	\$1,638.00	L140	CLC
6/24/2016	Reviewed Dell production, searching for documents to include in reply class cert papers for SES.	2.3	420	\$966.00	L140	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/24/2016	Prepared subpoenas for production of documents to third parties and served the same.	2	265	\$530.00	L390	JSD
6/24/2016	Edit briefs and analyze issues related to reply in support of class certification.	3.5	735	\$2,572.50	L210	JDF
6/24/2016	Downloaded the LIB final translation documents of LGC-MDL and Sony- LIB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/24/2016	Deposition preparation; update case file.	4	265	\$1,060.00	L140	BRM
6/24/2016	Confer with third parties re subpoenas; draft correspondence re same; confer with SES re same.	2.2	575	\$1,265.00	L390	JCP
6/24/2016	Prepare for deposition of Yo Ahn (John) Oh (SDI). Review documents and email JDF.	1.9	605	\$1,149.50	L330	SES
6/24/2016	Attend defense questioning of Jangwon (Jack) Huh of LG Chem.	3.5	605	\$2,117.50	L330	SES
6/24/2016	Attend deposition of Jangwon (Jack) Huh of LG Chem. Review exhibits and draft outline of re-direct questioning of witness.	11	605	\$6,655.00	L330	SES
6/26/2016	Deposition preparation.	2	265	\$530.00	L140	BRM
6/27/2016	Reviewed preliminary approval papers and Judge Gonzalez Rogers' orders; responded to Michael Kipling of T-Mobile regarding whether T-Mobile has and can produce class member contact information.	0.6	420	\$252.00	L120	CLC
6/27/2016	Spoke with Mike Kipling at T-Mobile regarding production of T-Mobile's customer contact information.	0.2	420	\$84.00	L120	CLC
6/27/2016	Reviewed Albert Kim document summaries in order to compare with SES which documents to choose for translation for Albert Kim deposition.	3.5	420	\$1,470.00	L330	CLC
6/27/2016	Transferred Abrantes-Metz errata in errata sheet.	1.5	265	\$397.50	L330	JSD
6/27/2016	Prepare for deposition of Yo Ahn Oh (SDI).	2.2	735	\$1,617.00	L330	JDF
6/27/2016	Downloaded the LIB - final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/27/2016	Deposition preparation; update case file; process third-party productions for expert review.	2.2	265	\$583.00	L140	BRM
6/27/2016	Confer with third parties re subpoenas; draft correspondence re same; legal Research re motion to compel data from Walmart; draft brief re same.	8.5	575	\$4,887.50	L390	JCP
6/27/2016	Review documents in preparation for Oh deposition.	1.5	605	\$907.50	L330	SES
6/27/2016	Draft opposition to motion to exclude Dr. Abrantes-Metz.	4	450	\$1,800.00	L210	MAS
6/28/2016	Reviewed document summaries of "hot" Albert Kim documents in order to determine which documents should be translated in anticipation of his	4.1	420	\$1,722.00	L330	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	upcoming deposition.					
6/28/2016	Reviewed complaint in preparation for Albert Kim deposition.	1.3	420	\$546.00	L330	CLC
6/28/2016	Corresponded with DL and SES regarding production of class member contact information from Amazon, sent ASIN list from experts, and searched notes to provide update on status to SES.	1.2	420	\$504.00	L120	CLC
6/28/2016	Formatted and proofed JCP letter to third party counsel and served the same.	0.8	265	\$212.00	L390	JSD
6/28/2016	Arranged for conference call meeting for JCP.	0.2	265	\$53.00	L120	JSD
6/28/2016	Take deposition of Yo Ahn Oh.	9	735	\$6,615.00	L330	JDF
6/28/2016	Downloaded the LIB - final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/28/2016	Review third-party productions for customer email information; update case file; prepare certified translations for uploading into review database.	3.1	265	\$821.50	L140	BRM
6/28/2016	Confer with third party re subpoenas; draft correspondence re same; confer with SES and co-counsel re same; fact and legal Research re Walmart discovery dispute.	7.2	575	\$4,140.00	L390	JCP
6/28/2016	Attend deposition of Yo Ahn Oh (SDI).	7.5	605	\$4,537.50	L330	SES
6/28/2016	Draft opposition to motion to exclude Dr. Metz.	1.4	450	\$630.00	L210	MAS
6/29/2016	Searched for BS's warranties, reviewed photos of warranties sent by BM, and emailed them to the rest of the KP from SG in order for her to send them to defendants after they were requested at BS's deposition.	0.6	420	\$252.00	L120	CLC
6/29/2016	Edit briefs and analyze issues related to reply in support of class certification.	4.2	735	\$3,087.00	L210	JDF
6/29/2016	Downloaded the LIB final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
6/29/2016	Update case file.	1.2	265	\$318.00	L140	BRM
6/29/2016	Confer with SES and JF re third party subpoenas; fact Research on product markets; confer with third parties re subpoenas; draft correspondence re same.	2.2	575	\$1,265.00	L390	JCP
6/29/2016	Attend deposition of Yo Ahn Oh (SDI).	3	605	\$1,815.00	L330	SES
6/30/2016	Drafted emails to co-leads regarding production of Best Buy data and communicated with them in order to determine whether IPPs wanted to move forward with having their data produced.	0.5	420	\$210.00	L120	CLC
6/30/2016	Reviewed Albert Kim document summaries of "hot" documents in order to decide which documents should be translated in anticipation of preparing for upcoming deposition.	1.6	420	\$672.00	L330	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
6/30/2016	Prepared notice and subpoenas and served the same.	2.5	265	\$662.50	L390	JSD
6/30/2016	Edit briefs and analyze issues related to reply in support of class certification.	2.5	735	\$1,837.50	L210	JDF
6/30/2016	Find reports or surveys for the power tool market, finding who the top several manufacturers are - 3.7.	3.7	350	\$1,295.00	L140	HH
6/30/2016	Call with DXL and Apple regarding production of class contact information and declaration regarding products with SKUs.	0.4	605	\$242.00	L390	SES
6/30/2016	Emails with C. Hammarskjold and B. Miller re: use of certified translations at Masunaga deposition.	0.2	450	\$90.00	L330	MAS
7/1/2016	Edit briefs and analyze issues related to reply in support of class certification.	3.5	735	\$2,572.50	L260	JDF
7/1/2016	Prepare third-party productions for expert review; update case file.	3.5	265	\$927.50	L140	BRM
7/1/2016	Confer with third parties re production; draft correspondence re same; confer with SES re same; draft letter brief re Walmart discovery dispute.	7.1	575	\$4,082.50	L390	JCP
7/1/2016	Edit motion to compel purchase and sales data from Walmart. Communicate with JCP and co-leads re same.	2.9	605	\$1,754.50	L210	SES
7/5/2016	Reviewed Fry's stipulation and incorporated edits, then sent to claims administrator for signature in anticipation of getting email addresses produced in order to provide notice to class of settlements.	1.1	420	\$462.00	L120	CLC
7/5/2016	Formatted and proofed JDF letter to defense counsel re backup data and served the same.	1.5	265	\$397.50	L390	JSD
7/5/2016	Canvassed Japanese translators for rates and availability for depositions between October - December.	1.5	265	\$397.50	L330	JSD
7/5/2016	Formatted and proofed re Stipulation re Fry's production of email addresses; efiled the same.	0.8	265	\$212.00	L210	JSD
7/5/2016	Formatted and proofed re depo scheduling; prepared amended notices of deposition and served the same.	2.5	265	\$662.50	L330	JSD
7/5/2016	Updated third party meet and confer chart.	1.7	265	\$450.50	L390	JSD
7/5/2016	Update case file; process document productions; deposition preparation.	2.3	265	\$609.50	L140	BRM
7/5/2016		0.5	605	\$302.50	L390	SES
7/6/2016	Downloaded depo. exhibits and renamed exhibits to conform to naming conventions.	1.5	265	\$397.50	L330	JSD
7/6/2016	Coordinated with vendor re status of service of third party subpoenas.	0.6	265	\$159.00	L390	JSD
7/6/2016	Continued canvassing Japanese translators for rates and availability for depositions between October - December.	2	265	\$530.00	L330	JSD
7/6/2016	Proofed, fact-checked and cite-checked letter brief re motion to compel	2.5	265	\$662.50	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Walmart data.					
7/6/2016	Edit briefs and analyze issues related to reply in support of class certification.	4.3	735	\$3,160.50	L260	JDF
7/6/2016	Downloaded the LIB - final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/6/2016	Update case file; process document productions; review status of third-party productions; deposition preparation.	1.5	265	\$397.50	L140	BRM
7/6/2016	Research and draft reply in support of class certification (pass-through sections).	5.1	605	\$3,085.50	L210	SES
7/7/2016	Reviewed Newegg's stipulation and drafted email to schedule phone call to discuss language of stipulation.	0.3	420	\$126.00	L120	CLC
7/7/2016	Proofed, fact-checked and cite-checked letter brief re motion to compel Walmart data.	2.5	265	\$662.50	L210	JSD
7/7/2016	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	3.8	350	\$1,330.00	L140	НН
7/7/2016	Downloaded the LIB final translation documents of PANA-C from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/7/2016	Update case file; prepare certified translations for loading into review database; review expert report and obtain cited references; deposition preparation.	4.5	265	\$1,192.50	L140	BRM
7/7/2016	Confer with third party counsel re subpoenas; draft correspondence re same; legal research re Walmart joint brief; draft joint brief.	5.2	575	\$2,990.00	L390	JCP
7/7/2016	Research and draft reply in support of class certification (pass-through sections).	7.3	605	\$4,416.50	L210	SES
7/7/2016	Co-lead call re class certification reply and experts.	0.5	605	\$302.50	L120	SES
7/8/2016	Proofed, fact-checked and cite-checked letter brief re motion to compel Walmart data; entered Walmart's portion, and efiled the same.	2.5	265	\$662.50	L210	JSD
7/8/2016	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	8.4	350	\$2,940.00	L140	НН
7/8/2016	Searched for the LIB documents for Jerrod.	0.2	150	\$30.00	L140	CL
7/8/2016	Update case file; process third-party productions assist with search and review of third-party communications with defendants.	4.3	265	\$1,139.50	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/8/2016	Confer with def counsel re letter brief; draft letter brief and finalize for filing; confer with third parties re subpoena response.	7	575	\$4,025.00	L390	JCP
7/8/2016	Research and draft reply in support of class certification (pass-through sections).	2	605	\$1,210.00	L210	SES
7/11/2016	Drafted Newegg stipulation regarding the production of emails to the claims administrator in order for notice to be provided to the class.	0.8	420	\$336.00	L120	CLC
7/11/2016	Drafted stipulation regarding Office Depot's production of emails to send to claims administrator to provide notice to class of settlements.	1.4	420	\$588.00	L120	CLC
7/11/2016	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	8.4	350	\$2,940.00	L140	НН
7/11/2016	Pulled out the LIB – production of third party communications documents with "CDW" search term for Jerrod.	3	150	\$450.00	L140	CL
7/11/2016	Check status of third-party communication productions in review database.	0.5	265	\$132.50	L140	BRM
7/11/2016	Draft outline for CDW deposition; fact Research re same.	4.3	575	\$2,472.50	L390	JCP
7/11/2016	Research and draft reply in support of class certification (pass-through sections).	7.5	605	\$4,537.50	L210	SES
7/12/2016	Reviewed Dell document production, looking for documents to include in LIB class cert reply papers.	1.2	420	\$504.00	L140	CLC
7/12/2016	Reviewed Albert Kim hot documents in order to determine which documents should be translated in anticipation of his deposition.	2.3	420	\$966.00	L330	CLC
7/12/2016	Extract list of class products for Office Depot/Office Max to assist in production of class contact information.	1.6	420	\$672.00	L120	CLC
7/12/2016	Edited Newegg and Office Depot stipulations regarding the production of email addresses to send to the claims administrator in anticipation of sending to both third parties for their final review and approval.	0.6	420	\$252.00	L120	CLC
7/12/2016	Updated chart of deposition scheduling.	0.8	265	\$212.00	L330	JSD
7/12/2016	Attn. expert work.	3.3	735	\$2,425.50	L130	JDF
7/12/2016	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	8.3	350	\$2,905.00	L140	НН
7/12/2016	Searched for the LIB - Bates ranges with "CDW" search term and printed into one PDF file for each set and sent to Jerrod.	3.5	150	\$525.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/12/2016	Update case file; organization of third-party productions and distribute to experts; review of third-party production communications to defendants.	2.5	265	\$662.50	L140	BRM
7/12/2016	Draft outline for CDW deposition; confer with SES re same.	4.3	575	\$2,472.50	L330	JCP
7/12/2016	Research and draft reply in support of class certification (pass-through sections).	4.2	605	\$2,541.00	L210	SES
7/12/2016	Send comments to JCP re CDW deposition outline.	0.5	605	\$302.50	L330	SES
7/13/2016	Met with GF from Newegg regarding production of email addresses, answering his questions, in order to have Newegg sign the stipulation and get the email addresses produced.	0.1	420	\$42.00	L120	CLC
7/13/2016	Extract list of class products for Office Depot/Office Max to assist in production of class contact information.	2.5	420	\$1,050.00	L120	CLC
7/13/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	2.6	420	\$1,092.00	L140	CLC
7/13/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	3.1	420	\$1,302.00	L140	CLC
7/13/2016	Downloaded deposition exhibits and renamed exhibits to conform to naming conventions.	1.5	265	\$397.50	L330	JSD
7/13/2016	Attn. expert analysis in support of reply in support of class certification.	2.2	735	\$1,617.00	L130	JDF
7/13/2016	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	8.4	350	\$2,940.00	L140	НН
7/13/2016	Update case file; organization and distribution of third-party productions to experts.	1.6	265	\$424.00	L140	BRM
7/13/2016	Call with co-leads re experts, strategy and class certification reply.	0.5	605	\$302.50	L120	SES
7/13/2016	Call with M. Kent re Toshiba witness Terado and request for deposition.	0.2	605	\$121.00	L330	SES
7/13/2016	Research and draft reply in support of class certification (pass-through sections). Communicate with expert re same.	7.7	605	\$4,658.50	L210	SES
7/14/2016	Downloaded deposition exhibits and renamed exhibits to conform to naming conventions.	2	265	\$530.00	L330	JSD
7/14/2016	Search for documents regarding competitiveness of the Chinese manufacturers; review documents return as hits from the Chinese terms search.	8.6	350	\$3,010.00	L140	НН
7/14/2016	Downloaded the LIB – final translation documents of PANA-C and SANYO-C from LCHB. Saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/14/2016	Update case file; process document productions; review status of third-party productions; assist with document review.	2.8	265	\$742.00	L140	BRM
7/14/2016	Confer with third parties re discovery; draft correspondence re same.	1.1	575	\$632.50	L390	JCP
7/15/2016	Updated third party chart.	0.5	265	\$132.50	L390	JSD
7/15/2016	Search for documents that discuss market share for power tools and camcorders (at OEM and retailer level) - 5.0.	5	350	\$1,750.00	L140	HH
7/15/2016	Updated the LIB - new productions on the Batteries Assignments chart; Put the LIB – new production documents into the right collections on Catalyst; Pulled out the LIB – NEC and Toshiba production documents of third party communications with "CDW" search term for Jerrod.	1	150	\$150.00	L140	CL
7/15/2016	Update case file.	1.2	265	\$318.00	L140	BRM
7/15/2016	Draft letter to Canon counsel re subpoena; confer with def counsel re depositions.	1.3	575	\$747.50	L390	JCP
7/18/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	2.6	420	\$1,092.00	L120	CLC
7/18/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	2.3	420	\$966.00	L140	CLC
7/18/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	3.2	420	\$1,344.00	L140	CLC
7/18/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	1.2	735	\$882.00	L260	JDF
7/18/2016	Search for documents that discuss market share for power tools and camcorders (at OEM and retailer level) - 8.5.	8.5	350	\$2,975.00	L140	НН
7/18/2016	Update case file; assist co-counsel with deposition exhibit project; update document production logs.	3	265	\$795.00	L140	BRM
7/18/2016	Confer with third parties re subpoenas; confer with experts re data; confer with JDF re subpoenas; draft letter to Canon counsel re discovery dispute.	3.3	575	\$1,897.50	L390	JCP
7/19/2016	Researched issue of how class rep contact information should be produced and distributed in anticipation of answering GF's questions (Newegg) regarding production of class member contact information in anticipation of having GF sign stipulation and send email addresses to claims administrator.	0.5	420	\$210.00	L210	CLC
7/19/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	4.5	420	\$1,890.00	L140	CLC
7/19/2016	Reviewed transcripts, documents regarding Chinese manufacturers for	3.5	420	\$1,470.00	L140	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	inclusion in class certification reply brief.					
7/19/2016	Met with GF of Newegg in order to discuss questions regarding production of class member contact email addresses in anticipation of having GF sign stipulation and have email addresses produced to claims administrator to provide notice to the class.	0.1	420	\$42.00	L120	CLC
7/19/2016	Reviewed invoices and transmitted for processing and payment.	1.5	265	\$397.50	L120	JSD
7/19/2016	Scanned and saved to case file proof of service.	1.5	265	\$397.50	L120	JSD
7/19/2016	Search for documents that discuss market share for power tools and camcorders (at OEM and retailer level) - 8.2.	8.2	350	\$2,870.00	L140	НН
7/19/2016	Downloaded the LIB – final translation documents of PANA-C from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/19/2016	Update case file; assist co-counsel with deposition exhibit project; organization of translations for uploading into review database.	3	265	\$795.00	L140	BRM
7/19/2016	Confer with third parties re subpoenas; draft correspondence re same; draft outline re CDW deposition.	2.4	575	\$1,380.00	L390	JCP
7/20/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	2.5	420	\$1,050.00	L260	CLC
7/20/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	2.5	420	\$1,050.00	L260	CLC
7/20/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	3.1	420	\$1,302.00	L260	CLC
7/20/2016	Prepared notice of Rule 30(b)(6) depositions to third parties and served the same.	2	265	\$530.00	L330	JSD
7/20/2016	Search for documents that show the market share for the power tool retailers - 8.	8	350	\$2,800.00	L140	НН
7/20/2016	Meet and confer with third parties re subpoenas; confer with team re same; draft deposition request, including 30b6 notice for CDW; review deposition outline re same.	5	575	\$2,875.00	L390	JCP
7/21/2016	Sent follow up email to JM (Office Depot) regarding production of class member contact information in anticipation of having her sign the stipulation governing the production.	0.1	420	\$42.00	L120	CLC
7/21/2016	Downloaded third party document productions and transmitted to experts.	3	265	\$795.00	L390	JSD
7/21/2016	Prepare for deposition of defense expert Calvert-Guerin on pass-through issues.	3.2	735	\$2,352.00	L130	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/21/2016	Downloaded the LIB – final translation documents of SDI-B and PANA-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/21/2016	Confer with counsel re subpoenas to third parties; draft deposition requests re 30b6 topics; draft correspondence re discovery disputes.	4.3	575	\$2,472.50	L390	JCP
7/22/2016	Researched issue of difference between notice provider and claims administrator in order to respond to JM's (Office Depot) questions, drafted her my response, and sent in anticipation of having her sign the stipulation to have class member contact information produced to notice provider.	0.3	420	\$126.00	L120	CLC
7/22/2016	Downloaded third party document productions and transmitted to experts.	2.5	265	\$662.50	L390	JSD
7/22/2016	Attn. expert analysis in support of reply in support of class certification.	2.5	735	\$1,837.50	L130	JDF
7/22/2016	Downloaded the LIB-final translation document of SONY-LIB from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/25/2016	Edited stipulation from Newegg regarding production of class member contact information to send to claims administrator and circulated to co-leads in anticipation of filing.	1.1	420	\$462.00	L120	CLC
7/25/2016	Attended document reviewer call with SES and document reviewers.	0.1	420	\$42.00	L120	CLC
7/25/2016	Downloaded deposition exhibits and renamed exhibits to conform to naming conventions.	2	265	\$530.00	L330	JSD
7/25/2016	Prepared amended notice of depositions; proofed attachment A.	1	265	\$265.00	L330	JSD
7/25/2016	Attn. expert analysis in support of reply in support of class certification.	3	735	\$2,205.00	L130	JDF
7/25/2016	Downloaded the LIB – final translation documents of LGC-MDL from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/25/2016	Update case file.	1.2	265	\$318.00	L140	BRM
7/25/2016	Confer with third parties re discovery; draft correspondence re same; review discovery re same; confer with defense counsel re depositions; draft discovery requests re same.	5.5	575	\$3,162.50	L390	JCP
7/25/2016	Research and draft reply in support of class certification (pass-through sections). Review evidence regarding role of Chinese manufacturers in the cylindrical market. Draft section of brief re ascertainability.	4	605	\$2,420.00	L260	SES
7/26/2016	Reviewed transcripts, documents regarding Chinese manufacturers for inclusion in class certification reply brief.	4.5	420	\$1,890.00	L260	CLC
7/26/2016	Updated third party meet and confer chart.	0.8	265	\$212.00	L390	JSD
7/26/2016	Prepared cross notice of Terado and served the same.	0.7	265	\$185.50	L330	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
7/26/2016	Updated deposition notice and Attachment A to third parties; prepared subpoenas and served the same; arranged for the depo coverage.	3	265	\$795.00	L330	JSD
7/26/2016	Attn. expert analysis in support of reply in support of class certification.	4	735	\$2,940.00	L130	JDF
7/26/2016	Update case file.	0.8	265	\$212.00	L140	BRM
7/26/2016	Confer with third parties re discovery; draft correspondence re same; confer with def counsel re depositions; draft deposition notices re same.	4.7	575	\$2,702.50	L390	JCP
7/26/2016	Research and draft reply in support of class certification (pass-through sections).	7.9	605	\$4,779.50	L260	SES
7/27/2016	Downloaded the LIB – final translation documents of SANYO-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
7/27/2016	Update case file; search databases for locations of potential witnesses; deposition preparation.	5	265	\$1,325.00	L140	BRM
7/27/2016	Prepare deposition outlines for CDW and Walmart; negotiate with defense counsel re deposition of Walmart and CDW reps.	7.2	575	\$4,140.00	L330	JCP
7/27/2016	Research and draft reply in support of class certification (pass-through sections).	8.1	605	\$4,900.50	L260	SES
7/28/2016	Attn. expert analysis in support of reply in support of class certification.	3.5	735	\$2,572.50	L130	JDF
7/28/2016	Searched and pulled out the LIB – documents of the SDI-B, NECT, MXT, NEC, TSB-LIB, and LGC-MDL with search term and sent to Jerrod.	1	150	\$150.00	L140	CL
7/28/2016	Document review regarding third-party communications; update case file.	2.4	265	\$636.00	L140	BRM
7/28/2016	Confer with third parties re discovery; draft correspondence re same; confer with defense counsel re depositions; draft outline questions re same.	6.5	575	\$3,737.50	L390	JCP
7/28/2016	Research and draft reply in support of class certification (pass-through sections).	1.5	605	\$907.50	L260	SES
7/29/2016	Answer to the questions re. potential LGC deponent (Jinhwan Kim).	4	350	\$1,400.00	L330	JC
7/29/2016	Searched and pulled out the LIB – documents of the PANATP with search term and sent to Jerrod.	1.5	150	\$225.00	L140	CL
7/29/2016	Update case file; prepare certified translations for loading into review database; process document productions; coordinate with opposing counsel to obtain replacement load file; assist with document review.	5.1	265	\$1,351.50	L140	BRM
8/1/2016	LiB team meeting (.30); Search for hot documents 8/1/2016 LG Chem new production (7.20).	7.5	350	\$2,625.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/1/2016	Reviewed order granting Fry's and Office Depot's stipulation regarding production of email addresses to compare with stipulation already signed and granted by the court and emailed to SES and CH regarding non-party production of email addresses to the claims administrators.	0.3	420	\$126.00	L312	CLC
8/1/2016	Downloaded third party document productions and transmitted to experts.	1.5	265	\$397.50	L140	JSD
8/1/2016	Prepared meeting room for JDF and the experts; attended to their requests.	0.5	265	\$132.50	L130	JSD
8/1/2016	Prepare for deposition of defense expert Calvert-Guerin on pass-through issues.	4.3	735	\$3,160.50	L330	JDF
8/1/2016	Search for documents that discuss market share for camcorders (at OEM and retailer level) - 8.2. Meeting with Shana3.	8.5	350	\$2,975.00	L140	HH
8/1/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7.5	125	\$937.50	L140	JWJ
8/1/2016	Downloaded the LIB – final translation document of IPP-SELDIN from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
8/1/2016	Draft joint letter briefs for Robert Bosch and Canon USA; confer with team re same.	9.1	575	\$5,232.50	L210	JCP
8/2/2016	Search for hot documents in 8/1/2016 LG Chem new production (9.00).	9	350	\$3,150.00	L140	JC
8/2/2016	Reviewed stipulation for Newegg regarding production of email addresses and got SES's signature, then sent to co-leads.	0.6	420	\$252.00	L312	CLC
8/2/2016	Downloaded document productions and transmitted to experts.	1.5	265	\$397.50	L140	JSD
8/2/2016	Researching Matsui Electronics and whether they supplied batteries.	0.5	125	\$62.50	L120	AE
8/2/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	2.5	735	\$1,837.50	L260	JDF
8/2/2016	Prepare for deposition of defense expert Calvert-Guerin on pass-through issues.	5.5	735	\$4,042.50	L330	JDF
8/2/2016	Continue searching for documents that discuss market share for camcorders (at OEM and retailer level) - 8.3.	8.3	350	\$2,905.00	L140	HH
8/2/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/2/2016	Draft joint letter briefs re motion to compel for Bosch and Canon; confer with team re same.	9.3	575	\$5,347.50	L210	JCP
8/2/2016	Draft reply in support of motion for class certification (pass-through section).	7.8	605	\$4,719.00	L260	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/2/2016	Revise opposition to motion to exclude Dr. Abrantes-Metz.	1.8	450	\$810.00	L210	MAS
8/3/2016	Search for hot documents in 8/1/2016 LG Chem new production (6.50).	6.5	350	\$2,275.00	L140	JC
8/3/2016	Sent emails regarding the filing of the Newegg stipulation regarding the production of email addresses to be sent to the claims administrator.	0.2	420	\$84.00	L312	CLC
8/3/2016	Prepared deposition notice and served the same.	1.5	265	\$397.50	L330	JSD
8/3/2016	Efiled Newegg's Stip. re production of email addresses and email Word copy to the court.	0.7	265	\$185.50	L210	JSD
8/3/2016	Prepare for deposition of defense expert Calvert-Guerin on pass-through issues.	3.5	735	\$2,572.50	L330	JDF
8/3/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	3	735	\$2,205.00	L260	JDF
8/3/2016	Continue searching for documents that discuss market share for camcorders (at OEM and retailer level) - 8.5.	8.5	350	\$2,975.00	L140	HH
8/3/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/3/2016	Downloaded the LIB final translation documents of LGC-MDL and Sanyo from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
8/3/2016	Draft joint letter briefs re motion to compel for Bosch and Canon; legal research re same.	2.3	575	\$1,322.50	L210	JCP
8/3/2016	Organize deposition schedule and assignments for deposition preparation. Communicate to litigation team.	1	605	\$605.00	L330	SES
8/3/2016	Revise opposition to motion to exclude Dr. Abrantes Metz report in light of rebuttal report.	1	450	\$450.00	L210	MAS
8/3/2016	Review rebuttal report by Dr. Abrantes Metz.	1	450	\$450.00	L130	MAS
8/4/2016	Meet and confer re economics tutorial submission.	0.5	950	\$475.00	L390	SWB
8/4/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (9.20).	9.2	350	\$3,220.00	L140	JC
8/4/2016	Prepared amended deposition of Walmart; proofed Attachment A thereto.	0.8	265	\$212.00	L330	JSD
8/4/2016	Prepare for deposition of defense expert Calvert-Guerin on pass-through issues.	4	735	\$2,940.00	L330	JDF
8/4/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	2.7	735	\$1,984.50	L260	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/4/2016	Continue searching for documents that discuss market share for camcorders (at OEM and retailer level) - 6.5.	6.5	350	\$2,275.00	L140	НН
8/4/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/4/2016	Update case file.	1	265	\$265.00	L120	BRM
8/4/2016	Draft joint letter briefs re motion to compel for Bosch and Canon.	4.1	575	\$2,357.50	L210	JCP
8/5/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (7.40).	7.4	350	\$2,590.00	L140	JC
8/5/2016	Emailed Newegg in order to put them in touch with AB Data after Magistrate Judge Ryu signed the stipulation regarding Newegg's production of email addresses.	0.1	420	\$42.00	L312	CLC
8/5/2016	Reviewed Albert Kim chronology, selecting documents that needed to be translated in order to help SES prepare for Albert Kim deposition prep.	4.5	420	\$1,890.00	L330	CLC
8/5/2016	Reviewed Albert Kim documents to prepare deposition outline and select exhibits.	1.2	420	\$504.00	L330	CLC
8/5/2016	Prepared notice of deposition to expert, served the same.	1	265	\$265.00	L330	JSD
8/5/2016	Fact, quote-and cite checked and proofed Canon discovery letter brief.	2.5	265	\$662.50	L210	JSD
8/5/2016	Fact, quote-and cite checked and proofed Bosch discovery letter brief.	3	265	\$795.00	L210	JSD
8/5/2016	Attend expert deposition of Calvert-Guerin and question re pass-through issues.	8.5	735	\$6,247.50	L330	JDF
8/5/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7.5	125	\$937.50	L140	JWJ
8/5/2016	Update case file; organization of third-party productions and distribute to experts.	1.4	265	\$371.00	L130	BRM
8/5/2016	Confer with third parties re subpoenas; draft correspondence re same.	1.9	575	\$1,092.50	L390	JCP
8/5/2016	Prepare for deposition of Daniel Moe (defense expert re pass-through on Best Buy).	0.7	605	\$423.50	L330	SES
8/5/2016	Edit IPPs' section of joint letter re motion to compel data from Canon.	1.8	605	\$1,089.00	L390	SES
8/5/2016	Edit IPPs' section of joint letter re motion to compel data from Bosch. Circulate to co-leads.	3	605	\$1,815.00	L390	SES
8/5/2016	Emails w. J. Friedman and Dr. Abrantes-Metz re rebuttal report.	0.2	450	\$90.00	L130	MAS
8/5/2016	Research cases permitting experts to testify on collusive nature of defendants'	0.7	450	\$315.00	L130	MAS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	conduct.					
8/7/2016	Reviewed Albert Kim documents to prepare deposition outline and select exhibits.	2.1	420	\$882.00	L330	CLC
8/8/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (10.00).	10	350	\$3,500.00	L140	JC
8/8/2016	Fact, quote-and cite checked and proofed Canon discovery letter brief.	2	265	\$530.00	L210	JSD
8/8/2016	Fact, quote-and cite checked and proofed Bosch discovery letter brief.	1.5	265	\$397.50	L210	JSD
8/8/2016	Prepared amended deposition of Walmart and CDW; proofed Attachment A thereto; served the same.	0.8	265	\$212.00	L330	JSD
8/8/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7.5	125	\$937.50	L140	JWJ
8/8/2016	Update case file; review defendant productions for missing production; process document production for loading; assist document review; organization of third-party productions and distribute to experts.	3.9	265	\$1,033.50	L140	BRM
8/8/2016	Draft and edit joint letter briefs for Bosch and for Canon; confer with defense counsel re same; prepare for filing; confer with defense counsel re same.	5.7	575	\$3,277.50	L210	JCP
8/8/2016	Prepare for deposition of Daniel Moe (defense expert re pass-through on Best Buy).	3	605	\$1,815.00	L330	SES
8/9/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (9.00).	9	350	\$3,150.00	L140	JC
8/9/2016	Reviewed Albert Kim documents to prepare deposition outline and select exhibits.	1.1	420	\$462.00	L330	CLC
8/9/2016	Reviewed Albert Kim documents to prepare deposition outline and select exhibits.	2.1	420	\$882.00	L330	CLC
8/9/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/9/2016	Downloaded the LIB – final translation documents of Sony-LIB and TSB- LIB from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
8/9/2016	Update case file; organization of third-party productions and distribute to experts; assist with document review.	2.4	265	\$636.00	L140	BRM
8/9/2016	Prepare for deposition of Daniel Moe (defense expert re pass-through on Best Buy).	3	605	\$1,815.00	L330	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/10/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (8.50).	8.5	350	\$2,975.00	L140	JC
8/10/2016	Reviewed Albert Kim documents to prepare deposition outline and select exhibits.	0.5	420	\$210.00	L330	CLC
8/10/2016	Reviewed and edited Office Depot stipulation making sure that all changes by Jessica Mason were reflected in the final version, then sent to AB Data for final approval before filing.	0.6	420	\$252.00	L210	CLC
8/10/2016	Reviewed Albert Kim documents to prepare deposition outline and select exhibits.	0.7	420	\$294.00	L330	CLC
8/10/2016	Updated chart of custodians and document production status.	1.5	265	\$397.50	L140	JSD
8/10/2016	Coordinated with vendor re upcoming depositions.	0.5	265	\$132.50	L330	JSD
8/10/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/10/2016	Downloaded the LIB documents and sent to Colleen; Downloaded the LIB Bates ranges and sent to Brian; Checked the LGC-MDL translation documents for Shana.	1	150	\$150.00	L140	CL
8/10/2016	Update case file; review defendant productions regarding finished-product data; deposition preparation; coordinate for re-production of missing document.	4.8	265	\$1,272.00	L330	BRM
8/10/2016	Confer with third parties re subpoenas; draft correspondence re same.	1.5	575	\$862.50	L390	JCP
8/10/2016	Prepare for deposition of Daniel Moe. Draft outline. Communicate with team members re same.	4	605	\$2,420.00	L330	SES
8/11/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (9.00).	9	350	\$3,150.00	L140	JC
8/11/2016	Reviewed plaintiffs' Joint Opposition to Toshiba Corporation's Motion for Summary Judgment on Withdrawal and supporting documents in anticipation of attending Terado deposition.	2.1	420	\$882.00	L330	CLC
8/11/2016	Reviewed deposition testimony from Toshiba witnesses in anticipation of attending Terado deposition.	3.1	420	\$1,302.00	L330	CLC
8/11/2016	Reviewed Toshiba's supporting documents and declarations in support of their motion for summary judgment on withdrawal in anticipation of attending Terado deposition.	1.7	420	\$714.00	L330	CLC
8/11/2016	Reviewed Office Depot's stipulation regarding the production of email	0.1	420	\$42.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	addresses, then sent to co-leads for their approval in anticipation of filing.					
8/11/2016	Reviewed Toshiba's Motion for Summary Judgment on Withdrawal in anticipation of attending Terado deposition.	2.1	420	\$882.00	L300	CLC
8/11/2016	Calendared deposition dates.	0.4	265	\$106.00	L330	JSD
8/11/2016	Researching battery capacity figures.	1	125	\$125.00	L120	AE
8/11/2016	Find capacity info for Sony and Sanyo cylindrical cells - 4.0.	4	350	\$1,400.00	L140	HH
8/11/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/11/2016	Downloaded the LIB – final translation documents of LGC-MDL from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
8/11/2016	Hearing preparation; update case file.	2.1	265	\$556.50	L120	BRM
8/11/2016	Confer with third parties re subpoenas; draft correspondence re same.	1.2	575	\$690.00	L390	JCP
8/11/2016	Depose Daniel Moe (declarant re Best Buy pricing opposing class certification). Send summary email to co-counsel.	3	605	\$1,815.00	L330	SES
8/12/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (7.00).	7	350	\$2,450.00	L140	JC
8/12/2016	Reviewed docket, Toshiba's Motion for Summary Judgment on Withdrawal, Response by defendants' motion for class cert, and DPPs' motion for class cert to understand back ground before attending the Terado deposition.	1.9	420	\$798.00	L330	CLC
8/12/2016	Researching battery capacity figures.	8	125	\$1,000.00	L120	AE
8/12/2016	Find capacity info for Sony and Sanyo cylindrical cells - 3.9.	3.9	350	\$1,365.00	L140	HH
8/12/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/12/2016	Update case file; review deposition calendar.	1.2	265	\$318.00	L330	BRM
8/12/2016	Draft outline for Andrea Schaffer (Walmart rep).	2.7	575	\$1,552.50	L330	JCP
8/12/2016	Emails with S. Scarlett re: edits to Abrantes Metz rebuttal report.	0.2	450	\$90.00	L130	MAS
8/12/2016	Review Abrantes-Metz edits to rebuttal report.	0.5	450	\$225.00	L130	MAS
8/12/2016	Revise opposition to motion to exclude Abrantes Metz testimony and class cert reply brief in light of edits to Abrantes Metz reply report.	4	450	\$1,800.00	L210	MAS
8/14/2016	Review and edit opposition to motion to exclude testimony of Dr. Leamer.	2	605	\$1,210.00	L210	SES
8/15/2016	LiB team meeting (0.20); Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (7.00).	7.2	350	\$2,520.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/15/2016	Reviewed Terado hot documents that were sent by DPPs and DAPs in anticipation of attending Terado deposition.	2.3	420	\$966.00	L330	CLC
8/15/2016	Reviewed Terado documents and drafted notes to determine hot documents and Terado's role at Toshiba in anticipation of attending Terado deposition.	2.6	420	\$1,092.00	L140	CLC
8/15/2016	Reviewed docket and updated service list.	0.5	265	\$132.50	L120	JSD
8/15/2016	Researching battery capacity figures; Weekly ODD/LiB/Resistors meeting.	8.5	125	\$1,062.50	L120	AE
8/15/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	5.5	735	\$4,042.50	L260	JDF
8/15/2016	Finding capacity info for Sony and Sanyo cylindrical cells - 8.2. Team meeting - 0.2.	8.4	350	\$2,940.00	L140	НН
8/15/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7.5	125	\$937.50	L140	JWJ
8/15/2016	Downloaded the LIB – final translation documents of LGC-MDL from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
8/15/2016	Assist experts with third-party discovery questions; update case file; organization of third-party productions.	3.4	265	\$901.00	L390	BRM
8/15/2016	Confer with third parties re subpoenas and discovery requests; draft correspondence re same.	2.1	575	\$1,207.50	L390	JCP
8/15/2016	Review and edit opposition to motion to exclude testimony of Dr. Leamer. Draft insert to reply brief regarding Dr. Leamer's testimony on the representativeness of data selection for overcharge and pass-through regression models.	6	605	\$3,630.00	L210	SES
8/15/2016	Draft Abrantes-Metz section of class cert reply.	4.6	450	\$2,070.00	L260	MAS
8/15/2016	Revise opposition to motion to exclude Abrantes-Metz testimony.	1	450	\$450.00	L210	MAS
8/16/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (5.90).	5.9	350	\$2,065.00	L140	JC
8/16/2016	Attended Terado deposition.	9	420	\$3,780.00	L330	CLC
8/16/2016	Sent JM from Office Depot signed order by Judge Ryu in anticipation of having her produce class member email addresses to AB Data.	0.1	420	\$42.00	L390	CLC
8/16/2016	Downloaded exhibits and saved into the master depository folder; renamed according to naming convention; saved depo transcripts on case file.	3	265	\$795.00	L120	JSD
8/16/2016	Updated third party chart.	1.5	265	\$397.50	L390	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/16/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	4.3	735	\$3,160.50	L260	JDF
8/16/2016	Finding capacity info for Sony and Sanyo cylindrical cells - 2.5. Team meeting - 0.2.	2.7	350	\$945.00	L140	HH
8/16/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/16/2016	Downloaded the LIB final translation documents of Sony-LIB from LCHB. Renamed and save in the Batteries shared folder; Put the LIB – new production documents of HML-P and TSB-LIB in the right collection in Catalyst; Updated new production documents on the Batteries Assignments – Master List.	1.2	150	\$180.00	L140	CL
8/16/2016	Assist experts with related-case damages information; update case file; organization of third-party productions; deposition preparation.	2.5	265	\$662.50	L330	BRM
8/16/2016	Draft outline and prepare exhibits for Andrea Schaffer (Walmart rep); confer with third parties re subpoenas and discovery requests.	8.8	575	\$5,060.00	L330	JCP
8/16/2016	Draft insert to reply in support of motion for class certification regarding reliability of pass-through analysis.	5	605	\$3,025.00	L260	SES
8/16/2016	Draft and revise Abrantes Metz section of class cert reply.	3	450	\$1,350.00	L260	MAS
8/17/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (1.00); Search for the documents identifying cell types in Palladium packs (4.60).	5.6	350	\$1,960.00	L140	JC
8/17/2016	Attended Terado (Toshiba) deposition.	8.9	420	\$3,738.00	L330	CLC
8/17/2016	Fact, quote-checked and proofed opposition to Daubert motion.	3	265	\$795.00	L210	JSD
8/17/2016	Formatted reply to motion for class cert and SES declaration; admin. motion to seal; prop. Order.	2.5	265	\$662.50	L260	JSD
8/17/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	5	735	\$3,675.00	L260	JDF
8/17/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/17/2016	Downloaded the LIB – final translation documents of S-DOJ and SANYO from LCHB. Renamed and saved in the Batteries shared folder; Searched on the Batteries Palladium's pack in Catalyst.	0.5	150	\$75.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/17/2016	Deposition preparation; update case file; assist with preparation of class certification reply.	3.7	265	\$980.50	L260	BRM
8/17/2016	Prepare exhibits and deposition outline for Andrea Schaffer (Walmart); conduct deposition; prepare summary of deposition; assist in citations for reply brief; confer with third parties re subpoenas; prepare CDW deposition exhibits.	9.2	575	\$5,290.00	L330	JCP
8/17/2016	Research and edit reply in support of motion for class certification, including drafting sections regarding reliability of Learner overcharge analysis.	6.5	605	\$3,932.50	L260	SES
8/17/2016	Revise opposition to motion to exclude Abrantes Metz to reflect comments from B. Glackin.	4	450	\$1,800.00	L210	MAS
8/18/2016	Search for the documents for expert re. the specifications of cell used in Nokia, Garmin, Novatel and Motorola (8.00).	8	350	\$2,800.00	L130	JC
8/18/2016	Reviewed expert (Leamer) report in anticipation of helping fill in citations to IPPs' reply class cert brief.	1.4	420	\$588.00	L130	CLC
8/18/2016	Researched case law as to whether a class representative needs a receipt in order to include in plaintiffs' reply brief, summarized results and drafted footnote, then sent update to SES.	4.8	420	\$2,016.00	L260	CLC
8/18/2016	Fact, quote-checked and proofed opposition to Daubert motion.	6	265	\$1,590.00	L210	JSD
8/18/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	3.2	735	\$2,352.00	L260	JDF
8/18/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/18/2016	Downloaded the LIB – final translation documents of PANA-C and SANYO-C from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
8/18/2016	Update case file; deposition preparation; coordinate with third-party counsel and court reporter regarding deposition; assist with preparation of class certification reply brief.	4.8	265	\$1,272.00	L330	BRM
8/18/2016	Draft joint letter brief re discovery dispute with Milwaukee Tools; confer with third parties re subpoenas.	3.7	575	\$2,127.50	L390	JCP
8/18/2016	Research and edit reply in support of motion for class certification, including sections on predominance of common issues of fact and law. Review draft of Learner and Abrantes-Metz reports and send comments.	10.5	605	\$6,352.50	L260	SES
8/18/2016	Draft/revise opposition to motion to exclude Abrantes Metz testimony.	3	450	\$1,350.00	L210	MAS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/18/2016	Research opposition to motion to exclude Abrantes Metz testimony.	3	450	\$1,350.00	L210	MAS
8/19/2016	Emails remotion to exclude Dr. Abrantes-Metz.	0.5	950	\$475.00	L130	SWB
8/19/2016	Search for the documents for expert re the specifications of cell used in Nokia, Garmin, Novatel and Motorola (8.20).	8.2	350	\$2,870.00	L130	JC
8/19/2016	Reviewed Leamer report in anticipation of helping with reply papers.	0.8	420	\$336.00	L130	CLC
8/19/2016	Read transcript sent by LCHB, then searched docket and case file for correct transcript on motion to amend hearing in order to include relevant portions in reply papers.	1.1	420	\$462.00	L260	CLC
8/19/2016	Researched case law for SES to include in reply class cert brief.	2.9	420	\$1,218.00	L260	CLC
8/19/2016	Downloaded exhibits and saved into the master depository folder; renamed according to naming convention; saved depo transcripts on case file.	2	265	\$530.00	L120	JSD
8/19/2016	Fact, quote- and cite-checked, and proofed reply to class cert. and opposition to Daubert motion.	5	265	\$1,325.00	L260	JSD
8/19/2016	Researching Toshiba corporate liability issues.	7.3	125	\$912.50	L140	AE
8/19/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/19/2016	Update case file; assist with preparation of class certification reply brief.	3.7	265	\$980.50	L120	BRM
8/19/2016	Draft joint letter brief re Milwaukee; prepare outline and exhibits for van Lieshout deposition; conduct deposition; summarize dep for team; assist with cites for reply brief; confer with third parties re discovery disputes.	6.1	575	\$3,507.50	L330	JCP
8/19/2016	Research and edit reply in support of motion for class certification, including sections regarding ascertainability, application of California law to nationwide class.	9	605	\$5,445.00	L260	SES
8/19/2016	Revise opposition to motion to exclude Abrantes-Metz in response to additional comments from J. Friedman.	1	450	\$450.00	L210	MAS
8/19/2016	Revise Abrantes-Metz section of class cert reply.	1	450	\$450.00	L260	MAS
8/19/2016	Revise opposition to motion to exclude Dr. Abrantes Metz testimony in response to J. Friedman comments.	1.5	450	\$675.00	L210	MAS
8/19/2016	Make and send Dr. Abrantes-Metz comments on her rebuttal report.	1	450	\$450.00	L130	MAS
8/20/2016	Fact, quote- and cite-checked, and proofed reply to class cert. and opposition to Daubert motion.	6	265	\$1,590.00	L260	JSD
8/20/2016	Assist with preparation of class certification reply documents.	10	265	\$2,650.00	L260	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/20/2016	Research and edit reply in support of motion for class certification, including section regarding reliability of overcharge model.	4.9	605	\$2,964.50	L260	SES
8/21/2016	Reviewed expert Learner reply report in anticipation of helping with reply class cert filings.	6.1	420	\$2,562.00	L260	CLC
8/21/2016	Fact, quote- and cite-checked, and proofed reply to class cert. and opposition to Daubert motion.	9	265	\$2,385.00	L260	JSD
8/21/2016	Assist with preparation of class certification reply brief and supporting documents; update case file.	8.5	265	\$2,252.50	L260	BRM
8/22/2016	Lib team meeting (0.30); Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (8.50).	8.8	350	\$3,080.00	L140	JC
8/22/2016	Added citations to the reply class cert papers to Learner reply report.	4.1	420	\$1,722.00	L260	CLC
8/22/2016	Found pin cites for instances of where the court found pass-through in cases relied on for the reply class cert papers in order to include them in the motion.	0.5	420	\$210.00	L260	CLC
8/22/2016	Reviewed LIB reply papers, looking for language and other edits, in anticipation of filing.	2.6	420	\$1,092.00	L260	CLC
8/22/2016	Drafted Hiroyuko Terado notes and sent to team.	1.9	420	\$798.00	L330	CLC
8/22/2016	Fact, quote- and cite-checked, and proofed reply to class cert. and opposition to Daubert motion.	9	265	\$2,385.00	L260	JSD
8/22/2016	Resolved issue re translator payment.	0.5	265	\$132.50	L120	JSD
8/22/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	3.5	735	\$2,572.50	L260	JDF
8/22/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7.5	125	\$937.50	L140	JWJ
8/22/2016	Downloaded the LIB – final translation documents of SANYO-C and LGC- MDL from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
8/22/2016	Assist with preparation of class certification reply and supporting documents; update case file.	7.8	265	\$2,067.00	L260	BRM
8/22/2016	Confer with third parties re subpoenas; travel to SF for hearing on motion to compel.	4.7	575	\$2,702.50	L230	JCP
8/22/2016	Draft joint letter brief with Milwaukee Tools re motion to compel.	2.9	575	\$1,667.50	L210	JCP
8/22/2016	Edit reply in support of motion for class certification. Draft declaration and proposed orders. Review Oppositions to Motions to Exclude testimony of	9	605	\$5,445.00	L260	SES

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	Drs. Leamers and Abrantes-Metz.					
8/22/2016	Emails with Dr. Abrantes Metz regarding edits to her rebuttal report.	0.3	450	\$135.00	L130	MAS
8/22/2016	Review and make further comments to Abrantes Metz rebuttal report.	2	450	\$900.00	L130	MAS
8/22/2016	Make edits/cuts to opposition to motion to exclude Dr. Abrantes Metz to bring within page limits.	1.7	450	\$765.00	L210	MAS
8/23/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (9.00).	9	350	\$3,150.00	L140	JC
8/23/2016	Worked with JD to have redactions added into reply class cert papers and get it filed by deadline.	0.9	420	\$378.00	L260	CLC
8/23/2016	Reviewed Learner expert report and included citations into reply class cert papers.	2.4	420	\$1,008.00	L260	CLC
8/23/2016	Reviewed Defendants' administrative motions to amend particular filings in order to determine which information needed to be redacted from reply class cert papers.	1.3	420	\$546.00	L260	CLC
8/23/2016	Redacted reply class cert papers in anticipation of filing after discussing with SES.	3.1	420	\$1,302.00	L260	CLC
8/23/2016	Reviewed reply papers for redactions in anticipation of filing.	4.2	420	\$1,764.00	L260	CLC
8/23/2016	Searched for John Lee in LIB depo chart and on case file and communicated with SES and JG regarding whether he is scheduled as a deponent.	1.5	420	\$630.00	L330	CLC
8/23/2016	Communicated with document reviewer JC to determine status of project for John Lee.	0.2	420	\$84.00	L120	CLC
8/23/2016	Proofed reply to class cert. and oppositions to Daubert motions, Scarlett Declaration; updated admin. motion to seal and proposed order; redact briefs, and efiled the same.	16	265	\$4,240.00	L260	JSD
8/23/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	3.2	735	\$2,352.00	L260	JDF
8/23/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/23/2016	Assist with preparation and filing of class certification brief and supporting documents.	14.6	265	\$3,869.00	L260	BRM
8/23/2016	Prepare for hearing on motion to compel Walmart data.	1.1	575	\$632.50	L230	JCP

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/23/2016	Edit reply in support of motion for class certification. Draft declaration and proposed orders. Review Oppositions to Motions to Exclude testimony of Drs. Learners and Abrantes-Metz. Oversaw filing of same.	11	605	\$6,655.00	L260	SES
8/23/2016	Correct legal citations by reconciling Westlaw and Lexis citations in Abrantes-Metz Daubert opposition.	0.2	450	\$90.00	L210	MAS
8/23/2016	Supply citations to Abrantes Metz rebuttal report in class cert reply brief.	0.5	450	\$225.00	L260	MAS
8/23/2016	Review and make redactions to Abrantes Metz Daubert opposition.	0.8	450	\$360.00	L210	MAS
8/23/2016	Review and correct legal and record citations in opposition to Abrantes-Metz Daubert motion.	0.5	450	\$225.00	L210	MAS
8/23/2016	Make further cuts to Abrantes Metz Daubert opposition to bring within page limit.	0.7	450	\$315.00	L210	MAS
8/23/2016	Draft proposed order for opposition to motion to exclude Dr. Abrantes-Metz.	0.5	450	\$225.00	L210	MAS
8/23/2016	Review further edits by Dr. Abrantes Metz to her expert rebuttal report.	1	450	\$450.00	L130	MAS
8/23/2016	Call with S. Williams regarding defendants' scheduling proposal.	0.5	450	\$225.00	L120	MAS
8/24/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (3.00).	3	350	\$1,050.00	L140	JC
8/24/2016	Drafted letter to PLDS regarding typographical errors in their responses and requesting they send an amended set.	1.1	420	\$462.00	L311	CLC
8/24/2016	Prepared third party letter regarding IPPs' administrative motion to seal by redacting sealed information for the letters to each third party.	3.8	420	\$1,596.00	L260	CLC
8/24/2016	Prepared third party letter regarding IPPs' administrative motion to seal by redacting sealed information for the letters to each third party.	3.5	420	\$1,470.00	L260	CLC
8/24/2016	Reviewed Leamer and Metz expert reports in order to determine which third parties needed to be notified of IPPs' administrative motion to seal in anticipation of drafting letter to those third parties.	1.8	420	\$756.00	L130	CLC
8/24/2016	Prepared third party letter regarding IPPs' administrative motion to seal by redacting sealed information for the letters to each third party.	1.3	420	\$546.00	L260	CLC
8/24/2016	Drafted stipulation regarding administrative motion to seal documents filed in connection with reply class cert papers.	1.3	420	\$546.00	L260	CLC
8/24/2016	Prepared letters to third parties re sealing motion and redacted their materials; transmitted said materials to third parties.	13.5	265	\$3,577.50	L210	JSD
8/24/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/24/2016	Organization of class certification briefings; assist co-counsel with same; create chambers copies; Update case file; process document productions for loading; update case file; prepare third-party notices regarding transactional data used in class certification brief and expert reports.	9.8	265	\$2,597.00	L260	BRM
8/24/2016	Prepare for hearing on motion to compel Walmart data; confer with team re same.	0.5	575	\$287.50	L230	JCP
8/25/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011)	8	350	\$2,800.00	L140	JC
8/25/2016	Prepared third party letter regarding IPPs' administrative motion to seal by redacting sealed information for the letters to each third party.	0.8	420	\$336.00	L260	CLC
8/25/2016	Drafted and edited stipulation extending the time third parties could respond to IPPs' and DPPs' administrative motions to seal, then sent to DPPs' for approval.	2.1	420	\$882.00	L260	CLC
8/25/2016	Responded to third parties' inquiries to the IPPs' and DPP's administrative motion to seal documents filed in connection with reply class cert papers and incorporated progress into chart.	1	420	\$420.00	L260	CLC
8/25/2016	Created chart to keep track of third parties' responses to letters notifying them of IPPs' and DPPs' filing of the administrative motion to seal documents filed in connection of reply class cert papers in anticipation of responding to their inquiries, and then included all the responses we had received into the chart.	0.8	420	\$336.00	L260	CLC
8/25/2016	Proofed stip. and proposed order re IPPs' admin. motion to seal materials.	1.5	265	\$397.50	L210	JSD
8/25/2016	Prepared letters to third parties re sealing motion and redacted their materials; transmitted said materials to third parties.	6	265	\$1,590.00	L210	JSD
8/25/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/25/2016	Organization of pleadings; update case file.	3.2	265	\$848.00	L120	BRM
8/25/2016	Prepare exhibits and legal research re motion to compel Walmart data; travel to hearing; participate in hearing; confer with team re hearing; travel back to Seattle.	9.7	575	\$5,577.50	L230	JCP
8/26/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011).	6.4	350	\$2,240.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
8/26/2016	Corresponded with team regarding getting stipulation extending time for defendants and third-parties to respond to DPPs' and IPPs' administrative motion to seal documents filed in connection with their reply class cert papers filed.	0.3	420	\$126.00	L260	CLC
8/26/2016	Proofed stip. and proposed order re IPPs' admin. motion to seal materials and efiled the same.	1	265	\$265.00	L210	JSD
8/26/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	4	125	\$500.00	L140	JWJ
8/26/2016	Assist attorneys with related-case document questions; update case file; prepare and produced expert report backup data; prepare stipulation regarding confidentiality issues (class certification briefing).	3.9	265	\$1,033.50	L260	BRM
8/29/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011).	10	350	\$3,500.00	L140	JC
8/29/2016	Emailed third parties to inform them that Judge Gonzalez Rogers had not yet signed the stipulation extending the time for defendants and third parties to respond to IPPs' and DPPs' administrative motions to seal documents filed in connection with their reply class cert papers.	0.3	420	\$126.00	L260	CLC
8/29/2016	Prepared notice of Learner Errata.	1	265	\$265.00	L330	JSD
8/29/2016	Called the clerk's office to verify hearing taken off calendar.	0.5	265	\$132.50	L120	JSD
8/29/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/29/2016	Put the LIB – new production documents of Panasonic, Sanyo, and Toshiba into collections in Catalyst.	1	150	\$150.00	L140	CL
8/29/2016	Assist attorneys with document requests; update case file and case calendar.	1.8	265	\$477.00	L311	BRM
8/29/2016	Draft revised protective order per court order.	3.8	575	\$2,185.00	L210	JCP
8/29/2016	Call with A. Elder regarding Japanese documents in DPP complaint.	0.2	450	\$90.00	L210	MAS
8/30/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011).	10	350	\$3,500.00	L140	JC
8/30/2016	Responded to Black and Decker's inquiries regarding the stipulation extending the time for third-parties to respond to administrative motions to seal documents filed in connection with IPPs' and DPPs' reply class cert papers and sent Judge Gonzalez Rogers' order on the stipulation to all the	0.3	420	\$126.00	L260	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	third parties.					
8/30/2016	Spoke with Jas from Aopen regarding when Aopen would to file a declaration in support of the administrative motion to seal and what they would need to do if they wanted information used in IPPs' reply class cert papers to remain under seal.	0.2	420	\$84.00	L120	CLC
8/30/2016	Prepared for call with third-party (Aopen) regarding when they would need to respond to IPPs' and DPPs' administrative motion to seal documents filed in connection the reply class cert papers by reviewing protective order, stipulation and administrative motion to seal.	1.3	420	\$546.00	L260	CLC
8/30/2016	Updated third party chart.	2.5	265	\$662.50	L390	JSD
8/30/2016	Reviewed US Legal/WOJ invoices for incorrect charges; scanned digital copies thereof.	3	265	\$795.00	L120	JSD
8/30/2016	Coordinated with vendor re upcoming depositions.	0.7	265	\$185.50	L330	JSD
8/30/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
8/30/2016	Update case file; deposition preparation; assist process document productions for loading into review database.	3.1	265	\$821.50	L140	BRM
8/30/2016	Prepare for deposition of Jae Kil (Albert) Kim (LGC). Select exhibits for translation and use at deposition.	5	605	\$3,025.00	L330	SES
8/31/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011).	8.3	350	\$2,905.00	L140	JC
8/31/2016	Updated notice of Learner Errata and efiled the same.	1	265	\$265.00	L330	JSD
8/31/2016	Pulled out the LIB – translation documents for Albert Kim deposition.	0.5	150	\$75.00	L140	CL
8/31/2016	Prepare for deposition of Jae Kil (Albert) Kim (LGC). Select exhibits for translation and use at deposition.	5	605	\$3,025.00	L330	SES
9/1/2016	Review of John Lee (LG Chem) document (calendars covering 2006 to 2011) (3.00).	3	350	\$1,050.00	L140	JC
9/1/2016	Attended meet and confer with JP and SES regarding defendants' request to re-depose experts after IPPs' filed their reply papers for class certification.	0.2	420	\$84.00	L390	CLC
9/1/2016	Responded to third party's inquiry regarding how they needed to respond to IPPs' and DPP's administrative motions to seal documents filed in connection with reply class cert papers.	0.3	420	\$126.00	L260	CLC
9/1/2016	Identified third party confidential documents for sealing declaration.	1.2	265	\$318.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/1/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/1/2016	Downloaded the LIB – translation documents of LGC-MDL and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
9/1/2016	Update case file; assist attorneys with issue requests; process defendant re- production for loading.	1.2	265	\$318.00	L140	BRM
9/1/2016	Confer with Walmart re production; confer with third party counsel re subpoenas; read transcript of Walmart hearing.	1.7	575	\$977.50	L390	JCP
9/2/2016	Prepared deposition notice and subpoenas.	1.5	265	\$397.50	L330	JSD
9/2/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	2.5	735	\$1,837.50	L210	JDF
9/2/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/2/2016	Downloaded the LIB – translation document of SDI-B and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
9/5/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	2.2	735	\$1,617.00	L210	JDF
9/6/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016.	8	350	\$2,800.00	L140	JC
9/6/2016	Update deposition notice and serve the same.	0.7	265	\$185.50	L330	JSD
9/6/2016	Formatted and proofed joint letter brief.	1.8	265	\$477.00	L210	JSD
9/6/2016	Update case file with correspondence, discovery and pleadings.	1	265	\$265.00	L120	JSD
9/6/2016	Updated deposition chart.	1	265	\$265.00	L120	JSD
9/6/2016	Put the LIB – new production documents of LG Chem into collections in Catalyst; Collected the LIB – translation documents for Albert Kim deposition.	0.8	150	\$120.00	L140	CL
9/6/2016	Update case file; assist attorneys with factual research project.	2.3	265	\$609.50	L140	BRM
9/6/2016	Draft outline for Hayashi; review documents re same.	1.3	575	\$747.50	L330	JCP
9/7/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016.	8	350	\$2,800.00	L140	JC
9/7/2016	Calendared depo dates and arranged for their coverage.	0.4	265	\$106.00	L120	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/7/2016	Prepared chart re date of issuance of subpoenas and production of documents by third parties.	2	265	\$530.00	L120	JSD
9/7/2016	Formatted and proofed joint letter brief re Leamer deposition.	1.5	265	\$397.50	L210	JSD
9/7/2016	Efiled third party sealing declaration.	0.5	265	\$132.50	L210	JSD
9/7/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/7/2016	Call with co-leads re class certification motions and assignments.	0.3	605	\$181.50	L260	SES
9/8/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016 (8.00).	8	350	\$2,800.00	L140	JC
9/8/2016	Formatted and proofed joint letter brief re Leamer deposition.	1.5	265	\$397.50	L210	JSD
9/8/2016	Update depo calendar.	0.5	265	\$132.50	L120	JSD
9/8/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/8/2016	Call with DAPs re Albert Kim deposition.	0.1	605	\$60.50	L330	SES
9/9/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016 (8.00).	8	350	\$2,800.00	L140	JC
9/9/2016	Identified third party confidential documents for sealing declaration.	1.5	265	\$397.50	L210	JSD
9/9/2016	Update case file; assist co-counsel with document production issues.	2	265	\$530.00	L140	BRM
9/12/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016; LiB team meeting.	7.7	350	\$2,695.00	L140	JC
9/12/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/13/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016 (8.50).	8.5	350	\$2,975.00	L140	JC
9/13/2016	Efiled third party sealing declaration.	0.5	265	\$132.50	L210	JSD
9/13/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/13/2016	Assist with third-party confidentiality designation project; update case file.	1	265	\$265.00	L140	BRM
9/14/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016 (8.70).	8.7	350	\$3,045.00	L140	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/14/2016	Efiled third party sealing declaration.	0.5	265	\$132.50	L210	JSD
9/14/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/14/2016	Downloaded the LIB – final translation documents of LGC-MDL, Sanyo-C, and SDI-B from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
9/15/2016	Telephone conference with defendant re settlement; Review calculations provided by defendant	1	950	\$950.00	L160	SWB
9/15/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016 (8.80).	8.8	350	\$3,080.00	L140	JC
9/15/2016	Reviewed local rules on filing a declaration in support of an administrative motion to seal in anticipation of responding to Aopen's inquiry regarding how to keep their information under seal in IPPs' reply class cert papers.	0.2	420	\$84.00	L120	CLC
9/15/2016	Spoke with Jas of Aopen (third party) regarding IPPs' administrative motion to file under seal reply class cert papers and how Aopen could file a declaration in support of the motion.	0.1	420	\$42.00	L260	CLC
9/15/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/15/2016	Downloaded the LIB – final translation documents of SDI-B and LGC-MDL from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
9/16/2016	Search for hot documents in LG Chem new production as of 7/12/2016 and 8/20/2016 (4.70).	4.7	350	\$1,645.00	L140	JC
9/16/2016	Email Gordon at Newegg (third party) regarding how to file a declaration to keep Newegg's information used in IPPs' reply class cert papers under seal.	0.1	420	\$42.00	L120	CLC
9/16/2016	Efiled third parties' sealing declarations.	0.8	265	\$212.00	L210	JSD
9/16/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/16/2016	Prepared for deposition of Albert Kim (LGC).	6	605	\$3,630.00	L330	SES
9/19/2016	LiB team meeting (0.2); Review documents and create deposition outline for Albert Kim (LGC witness) (8.50).	8.7	350	\$3,045.00	L140	JC
9/19/2016	LiB team meeting (0.2); Review documents and create deposition outline for Albert Kim (LGC witness) (7.50).	8.7	350	\$3,045.00	L330	JC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/19/2016	Downloaded deposition transcripts and exhibits and updated master exhibit repository.	2.5	265	\$662.50	L120	JSD
9/19/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/19/2016	Update case file; process document production for loading into review database; update production log.	1.5	265	\$397.50	L140	BRM
9/19/2016	Prepare for deposition of Albert Kim (LGC).	6	605	\$3,630.00	L330	SES
9/20/2016	Review documents and create deposition outline for Albert Kim (LGC witness)	9.5	350	\$3,325.00	L140	JC
9/20/2016	Reviewed WOJ invoices and transmitted the same for processing and payment.	2	265	\$530.00	L120	JSD
9/20/2016	Calendared depo dates.	0.5	265	\$132.50	L120	JSD
9/20/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/20/2016	Downloaded the LIB – final translation documents of LGC-MDL from LCHB. Renamed and saved in the Batteries shared folder; Put the LIB – new production documents of LGC, SDI, and Sanyo into collections; Updated the LIB – new production documents on the Batteries Assignment chart; Answered Jongguk's questions for the LG Chem translation documents and grandfathered translation documents.	2	150	\$300.00	L140	CL
9/20/2016	Update case file with correspondence, discovery and pleadings; review original defendant production media regarding corrupted files.	2.1	265	\$556.50	L140	BRM
9/20/2016	Research and edit IPPs' response to motion to compel further depositions of witnesses.	1	605	\$605.00	L210	SES
9/21/2016	Review documents and create deposition outline for Albert Kim (LGC witness)	9	350	\$3,150.00	L330	JC
9/21/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/21/2016	Saved the LIB – translation documents for Albert Kim deposition; Sent a zip file of the LIB – translation documents for Albert Kim deposition to Shana.	0.5	150	\$75.00	L140	CL
9/21/2016	Update case file with correspondence, discovery and pleadings; assist co- counsel with document requests; prepare certified translations for loading	3.4	265	\$901.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	into review database.					
9/21/2016	Call with trial team re pending motions to compel and necessity of further discovery conferences.	1	605	\$605.00	L120	SES
9/21/2016	Co-lead call re depositions, class certification and strategy.	0.3	605	\$181.50	L120	SES
9/22/2016	Review documents and create deposition outline for Albert Kim (LGC witness)	9	350	\$3,150.00	L330	JC
9/22/2016	Prepared chart of number of all merit depositions; the main chair and attorneys who attended the same.	1	265	\$265.00	L120	JSD
9/22/2016	Update case file with correspondence, discovery and pleadings; assist co- counsel with document requests.	1.7	265	\$450.50	L140	BRM
9/23/2016	Review documents and create deposition outline for Albert Kim (LGC witness)	9	350	\$3,150.00	L140	JC
9/23/2016	Prepared notice of errata and efiled the same.	1	265	\$265.00	L210	JSD
9/23/2016	Update case file with correspondence, discovery and pleadings.	1	265	\$265.00	L140	BRM
9/26/2016	Review documents and create deposition outline for Albert Kim (LGC witness); LiB team meeting (0.20).	8.2	350	\$2,870.00	L140	JC
9/26/2016	Searched on the Everlaw LIB database for Deuk Yong Kwon translation documents for Shana.	1	150	\$150.00	L140	CL
9/26/2016	Update case file with correspondence, discovery and pleadings; process document productions for loading into review database.	1.4	265	\$371.00	L120	BRM
9/27/2016	Answer to a team member's question (0.50); Review documents and create deposition outline for Albert Kim (LGC witness) (7.50).	8	350	\$2,800.00	L140	JC
9/27/2016	Prepared chart of number of all merit depositions; the main chair and attorneys who attended the same.	2	265	\$530.00	L120	JSD
9/27/2016	Translation review of doc. SDI-B-000028302 and verifying as Sony 0.8.	0.8	350	\$280.00	L140	НН
9/27/2016	Review objections and serial objector file on Sweeney and discuss with SES.	3	605	\$1,815.00	L160	CAO
9/27/2016	Confer with third parties re discovery disputes; draft correspondence to third parties regarding same; review productions from third parties regarding same.	1.3	575	\$747.50	L390	JCP
9/28/2016	Telephone conference re production by LG employee and review issues.	1	950	\$950.00	L140	SWB
9/28/2016	Review documents and create deposition outline for Albert Kim (LGC witness)	11.9	350	\$4,165.00	L140	JC
9/28/2016	Attended weekly call with co-leads.	0.4	420	\$168.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
9/28/2016	Calendared depo dates.	0.3	265	\$79.50	L120	JSD
9/28/2016	Attended to inquiries re LG Chem document production issues.	1	265	\$265.00	L140	JSD
9/28/2016	Update case file with correspondence, discovery and pleadings; process document productions for loading into review database; update production log.	2.5	265	\$662.50	L140	BRM
9/28/2016	Attend call with co-lead counsel re discovery and strategy.	0.3	605	\$181.50	L120	SES
9/29/2016	Review documents and create deposition outline for Albert Kim (LGC witness)	9.7	350	\$3,395.00	L140	JC
9/29/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/30/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
9/30/2016	Downloaded the LIB – final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
9/30/2016	Confer with third parties regarding discovery disputes; draft correspondence to third parties regarding same; review documents productions regarding discovery disputes.	1.7	575	\$977.50	L390	JCP
10/3/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with CLC re assignments.	8	125	\$1,000.00	L140	JWJ
10/3/2016	Downloaded the LIB – final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/3/2016	Confer with third parties regarding discovery disputes and production of documents; draft correspondence to third parties regarding same.	1	575	\$575.00	L390	JCP
10/4/2016	Update case file with correspondence, discovery and pleadings.	3.5	265	\$927.50	L120	JSD
10/4/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/4/2016	Downloaded the LIB – final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/4/2016	Update case file with correspondence, discovery and pleadings.	1.2	265	\$318.00	L140	BRM
10/5/2016	Attended LIB weekly meeting with co-leads.	0.1	420	\$42.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/5/2016	Downloaded the LIB-final translation documents of SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/5/2016	Organization of third-party productions and assist attorney with review; update case file with correspondence, discovery and pleadings.	1.9	265	\$503.50	L140	BRM
10/5/2016	Meet and confer with third parties regarding discovery disputes; draft correspondence to third parties and to co-lead counsel regarding same; edit draft Protective Order for third party production.	2.2	575	\$1,265.00	L390	JCP
10/5/2016	Draft letter to N. Eimer re protocol for obtaining documents from witness.	1	605	\$605.00	L390	SES
10/6/2016	Answer to supervising attorney's question re. Youngsun Kim (LGC deponent).	9.5	350	\$3,325.00	L140	JC
10/6/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/6/2016	Download and review document production.	0.9	265	\$238.50	L140	BRM
10/6/2016	Meet and confer with third parties regarding discovery disputes; draft correspondence to third parties regarding same; confer with team regarding same; conduct factual research for hearing on motion to compel documents from Robert Bosch and Canon.	2.2	575	\$1,265.00	L390	JCP
10/6/2016	Call with LG Chem regarding document productions; follow up call with DAPs re same and deposition scheduling.	0.8	605	\$484.00	L390	SES
10/7/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/7/2016	Downloaded the LIB-final translation documents of SDI-B, SANYO, and S-DOJ from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/7/2016	Draft and edit two letter briefs with respect to motion to compel Bosch and motion to compel Canon for production data; conduct factual and legal research regarding same; confer with defense counsel regarding same; confer with co-counsel regarding Protective Order as it relates to joint letter briefs; edit Protective order; confer with team re same.	6.8	575	\$3,910.00	L210	JCP
10/8/2016	Answer to supervising attorney's question re. LGC (0.50).	0.5	350	\$175.00	L140	JC
10/10/2016	Proofed discovery letter briefs (re third party productions - Milwaukee, Bosch and Canon); prepared admin. motion to seal and proposed orders, and filed the same.	7	265	\$1,855.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/10/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with CLC re assignments.	8	125	\$1,000.00	L140	JWJ
10/10/2016	Put the LIB new production documents of LG Chem into collections in Catalyst. Updated LIB new production documents on the Batteries Assignments Master List.	1	150	\$150.00	L140	CL
10/10/2016	Draft and edit two letter briefs with respect to motion to compel data from Bosch and motion to compel data from Canon; confer with defense counsel regarding same; prepare letter briefs for filing; review materials submitted under seal; review and edit administrative motion to file under seal and accompanying order.	4.7	575	\$2,702.50	L210	JCP
10/10/2016	Call with re obtaining documents from third party witness.	0.1	605	\$60.50	L390	SES
10/11/2016	Prepared letter re cancellation of LG Chem depositions and served the same.	1	265	\$265.00	L330	JSD
10/11/2016	Prepared letter to third parties re under seal filing re discovery brief regarding Canon production.	1.8	265	\$477.00	L210	JSD
10/11/2016	Calendared depo dates and deadlines.	0.4	265	\$106.00	L120	JSD
10/11/2016	Fact analysis.	2.3	735	\$1,690.50	L120	JDF
10/11/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/11/2016	Update case file with correspondence, discovery and pleadings.	1	265	\$265.00	L140	BRM
10/12/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/12/2016	Downloaded the LIB – final translation documents of LGC-MDL, TSB-LIB, and Sanyo from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/12/2016	Update case file with correspondence, discovery and pleadings.	1.3	265	\$344.50	L140	BRM
10/12/2016	Review materials submitted regarding material filed under seal; conduct further research regarding sealing procedure; confer with team regarding same.	3.2	575	\$1,840.00	L210	JCP
10/13/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/13/2016	Put the LIB – new production documents of the LGC into collections in Catalyst. Downloaded the LIB – final translation documents of Sanyo from LCHB. Renamed and saved in the Batteries shared folder.	1	150	\$150.00	L140	CL
10/13/2016	Prepare for motion to compel hearing by reviewing filed motions and preparing an outline; attend hearing regarding motion to compel; confer with third party attorneys regarding motion to compel.	3.7	575	\$2,127.50	L210	JCP
10/14/2016	Calendared due dates and depo dates; cleaned up calendar.	0.5	265	\$132.50	L120	JSD
10/14/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/14/2016	Downloaded the LIB – final translation documents of LGC-MDL from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/14/2016	Process document productions for loading into review database; update case file with pleadings and correspondence.	2.1	265	\$556.50	L140	BRM
10/14/2016	Call with LG Chem regarding document productions.	0.5	605	\$302.50	L390	SES
10/17/2016		2.2	735	\$1,617.00	L160	JDF
10/17/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with CLC re assignments.	8	125	\$1,000.00	L140	JWJ
10/18/2016		1.1	735	\$808.50	L160	JDF
10/18/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/18/2016	Downloaded the LIB – final translation documents of SDI-B and LGC – MDL. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/18/2016	Update case file with pleadings, correspondence and discovery.	1.8	265	\$477.00	L140	BRM
10/18/2016	Meet and confer with counsel for Canon regarding production pursuant to motion to compel; review protective order regarding same; review list of products regarding same; draft correspondence to team regarding same; draft correspondence to counsel for Bosch regarding production pursuant to motion to compel.	2.5	575	\$1,437.50	L390	JCP
10/19/2016	Attended LIB weekly call.	0.1	420	\$42.00	L120	CLC
10/19/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	2.3	735	\$1,690.50	L210	JDF

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/19/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/19/2016	Downloaded the LIB – final translation documents of the Pana-C, Sanyo-C from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/19/2016	Update case file with correspondence and pleadings.	1.3	265	\$344.50	L140	BRM
10/20/2016	Edit briefs and analyze issues related to reply in support of class certification, and oppositions to Daubert motions.	3	735	\$2,205.00	L210	JDF
10/20/2016	Downloaded the LIB – final translation documents of LGC-MDL from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/20/2016	Confer with defense counsel for Canon regarding production of data pursuant to motion to compel; factual research regarding same; review and edit chart of Canon products with cylindrical batteries; confer with Canon defense <u>counsel regarding same</u> .	2.7	575	\$1,552.50	L140	JCP
10/21/2016		1.7	265	\$450.50	L160	JSD
10/21/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/21/2016	Downloaded the LIB – final translation documents of SDI-B, Sanyo, and Pana-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/21/2016	Review of all class certification briefing regarding updated submission of materials to be filed under seal; update case file with correspondence and pleadings.	5.5	265	\$1,457.50	L140	BRM
10/21/2016	Draft letter to Court regarding motion to compel Canon data; confer with Canon defense counsel regarding same and regarding Protective Order; conduct factual investigation regarding Canon products with cylindrical <u>batteries</u> .	2.5	575	\$1,437.50	L210	JCP
10/21/2016		2.2	450	\$990.00	L160	BJS
10/24/2016	Downloaded exhibits and transcripts; update case files.	2	265	\$530.00	L330	JSD
10/24/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with SES re assignments.	8	125	\$1,000.00	L140	JWJ
10/24/2016	Update case file with pleadings and correspondence.	1.1	265	\$291.50	L140	BRM
10/25/2016	Reviewed Fernandez declaration ISO of IPPs' motion to file class cert papers	0.9	420	\$378.00	L210	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	under seal, then sent email to defendants regarding lack of attachment of exhibits to their filings.					
10/25/2016	Reviewed LIB docket and email from the court's clerk to determine how to handle re-filing IPPs' class cert papers.	1.2	420	\$504.00	L210	CLC
10/25/2016	Reviewed papers sent by co-leads in order to determine next steps for getting IPPs' class cert papers sent to the court.	1.1	420	\$462.00	L120	CLC
10/25/2016	Met with defendants and DPPs regarding sending documents to the court, then met with JD, BRM, and SES to discuss handling the project.	0.9	420	\$378.00	L120	CLC
10/25/2016	Prepared redactions of class cert. papers.	2	265	\$530.00	L210	JSD
10/25/2016	Researching camera battery types.	0.5	125	\$62.50	L140	AE
10/25/2016	Discussion re class cert and strategy with co-counsel.	1.5	735	\$1,102.50	L120	JDF
10/25/2016	Review translation for SANYO-C000100231 - 0.5.	0.5	350	\$175.00	L140	HH
10/25/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/25/2016	Downloaded the LIB – final translation documents of Sanyo-C and SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/25/2016	Review of class certification briefing for resubmission per court's request; update case file with correspondence.	7.2	265	\$1,908.00	L140	BRM
10/25/2016	Confer with Canon defense counsel regarding data of cylindrical camcorders; confer with IPPs' experts regarding same; conduct fact investigation regarding same.	1.4	575	\$805.00	L140	JCP
10/25/2016	Call with defense counsel and DPPs re submission of class certification materials to chambers. Communicate with staff re same.	1.3	605	\$786.50	L260	SES
10/26/2016	Prepared redactions of class cert. papers.	1.5	265	\$397.50	L210	JSD
10/26/2016	Researching and sending info on camera battery types.	3.5	125	\$437.50	L140	AE
10/26/2016	Identify whether "BP-808" or "BP-809" are cylindrical and find which Canon products have cylindrical batteries.	8.8	350	\$3,080.00	L140	НН
10/26/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/26/2016	Review and organize class certification materials per court's request.	7	265	\$1,855.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/26/2016	Confer with Canon counsel regarding motion to compel and the protective order; confer with experts regarding Canon data and the motion to compel data; review list of Canon productions regarding motion to compel.	2.1	575	\$1,207.50	L210	JCP
10/26/2016	Call with LG Chem regarding documents productions; confer with DPP counsel re same.	1	605	\$605.00	L390	SES
10/27/2016	Reviewed class cert filings and declarations in support of IPPs' administrative motion to file under seal in anticipation of drafting new administrative motions for IPPs' filings with a narrower set of redactions.	0.5	420	\$210.00	L120	CLC
10/27/2016	Drafted email to LCHB (co-leads) in order for them to provide a reconstructed version of IPPs' original motion for class cert in order for HB to prepare narrower set of redactions.	0.3	420	\$126.00	L120	CLC
10/27/2016	Prepared for meeting with DPPs and defendants regarding sending court IPPs' class cert papers by reviewing IPPs' class cert papers and declarations in support of IPPs' administrative motion to file under seal.	1	420	\$420.00	L120	CLC
10/27/2016	Drafted notes from meeting with DPPs and defendants to distribute to team in order to coordinate how to comply with the court's request to send PDF copies to court and re-file unredacted versions of class certification papers.	0.5	420	\$210.00	L120	CLC
10/27/2016	Attended call with DPPs and defendants regarding filing "new" class cert papers and sending PDF copies to the court to comply with request from court.	0.3	420	\$126.00	L120	CLC
10/27/2016	Prepared redactions of class cert. papers.	8	265	\$2,120.00	L210	JSD
10/27/2016	Finding which Canon products have cylindrical batteries and searching for a list codes	3.5	350	\$1,225.00	L140	НН
10/27/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/27/2016	Put the LIB new production documents of LGC into collections. Downloaded the LIB – final translation documents of Sanyo-C. Renamed and saved in the Batteries shared folder.	0.5	150	\$75.00	L140	CL
10/27/2016	Assist attorneys with review of class certification briefing materials regarding resubmission; update case file with pleadings and correspondence.	5	265	\$1,325.00	L140	BRM
10/27/2016	Confer with counsel for Canon regarding motion to compel and protective order: draft joint letter brief regarding same; research legal issues	2.7	575	\$1,552.50	L210	JCP

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/28/2016	Prepared for and attached call with DPP (Will Bass) to discuss how IPPs were drafting their administrative motion to file under seal.	0.3	420	\$126.00	L120	CLC
10/28/2016	Reviewed correspondence from Cristina Fernandez regarding how to prepare IPPs renewed filings of class cert papers with a narrower set of redactions.	1.5	420	\$630.00	L120	CLC
10/28/2016	Drafted administrative motion to file under seal IPPs' "new" class cert papers with a narrower set of redactions by compiling all of the declarations in support of IPPs' original administrative motion to file under seal and creating a chart with all the requested redactions.	2.5	420	\$1,050.00	L210	CLC
10/28/2016	Drafted administrative motion to seal IPPs' new class cert filings with a narrower set of redactions.	3.3	420	\$1,386.00	L210	CLC
10/28/2016	Updated calendar.	0.5	265	\$132.50	L120	JSD
10/28/2016	Formatted and proofed joint letter brief re production of Canon data and efiled the same.	1.5	265	\$397.50	L210	JSD
10/28/2016	Formatted notice of withdrawals of IPPs' admin. motion to seal filings related to motion for class certification filings and class cert reply filings and proposed order thereto; prepared admin. motion to seal IPPs. Documents related to IPPs' resubmission of class cert. papers.	2.5	265	\$662.50	L210	JSD
10/28/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
10/28/2016	Downloaded the LIB – final translation documents of Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/28/2016	Update case file with correspondence; continue review of class certification materials for resubmission to court.	2.4	265	\$636.00	L140	BRM
10/28/2016	Draft and edit joint letter brief on motion to compel and protective order; confer with Canon counsel regarding same; confer with team regarding same.	2.8	575	\$1,610.00	L210	JCP
10/30/2016	Drafted proposed orders for IPPs' administrative motion to file under seal IPPs' class cert and reply class cert papers.	2.5	420	\$1,050.00	L210	CLC
10/30/2016	Drafted administrative motion to file under seal IPPs' reply class cert papers that pertains to a narrower set of redacted materials.	3.9	420	\$1,638.00	L210	CLC
10/30/2016	Drafted administrative motion to file under seal IPPs' motion for class certification.	3.5	420	\$1,470.00	L210	CLC
10/30/2016	Prepared redaction of class cert. papers.	5	265	\$1,325.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
10/30/2016	Continue review and preparation of class certification materials for resubmission per court's request.	8	265	\$2,120.00	L140	BRM
10/31/2016	Drafted administrative motion in regards to class cert filings that used documents from ODD in anticipation of filing anew IPPs' class cert papers with a narrower set of redactions.	3.1	420	\$1,302.00	L210	CLC
10/31/2016	Drafted and reviewed IPPs' proposed orders granting in part and denying in part IPPs' administrative motions to file under seal IPPs' class cert papers.	1.5	420	\$630.00	L210	CLC
10/31/2016	Drafted IPPs' notices of withdrawal for IPPs' original administrative motions to file under seal filings made in connection with IPPs motion for class certification and reply class cert papers.	1.5	420	\$630.00	L210	CLC
10/31/2016	Reviewed and drafted IPPs' administrative motions to file under seal IPPs' class cert and reply class cert papers.	2.1	420	\$882.00	L210	CLC
10/31/2016	Proofed admin. motions to file under seal documents and proposed orders; notice of withdrawal of admin. motion to seal.	2	265	\$530.00	L210	JSD
10/31/2016	Prepared redactions of class cert. papers.	3	265	\$795.00	L210	JSD
10/31/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with SES re assignments.	8	125	\$1,000.00	L140	JWJ
10/31/2016	Downloaded the LIB – final translation documents of the Sanyo-C from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
10/31/2016	Finalize class certification materials for resubmission per court's request; update case file with correspondence.	9.5	265	\$2,517.50	L140	BRM
10/31/2016	Edited settlement agreement with LG Chem.	0.7	450	\$315.00	L160	BJS
11/1/2016	Drafted letter to the Court regarding IPPs' resubmission of our class cert papers as requested by the Court.	2	420	\$840.00	L120	CLC
11/1/2016	Refiled class cert papers and reply in further support of class cert with BRM.	1.7	420	\$714.00	L120	CLC
11/1/2016	Reviewed class certification papers to make sure all redactions were accurate and all papers were ready to be filed in anticipation of filing IPPs' class cert papers with a narrower set of redactions.	2.5	420	\$1,050.00	L120	CLC
11/1/2016	Prepared admin. motions to seal and notices of withdrawal to seal.	1.8	265	\$477.00	L210	JSD
11/1/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	9	125	\$1,125.00	L140	JWJ
11/1/2016	Downloaded the LIB – final translation documents of the S-DOJ, Sony-LIB,	0.1	150	\$15.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
	SANYO, and Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.					
11/1/2016	Preparation of class certification materials for resubmission to court; update case file with pleadings, correspondence and discovery.	7.5	265	\$1,987.50	L140	BRM
11/2/2016	Searched for redacted expert documents filed in connection with the class cert papers to send to co-lead Steve Williams.	0.3	420	\$126.00	L120	CLC
11/2/2016	Attended the weekly call with co-leads.	0.1	420	\$42.00	L120	CLC
11/2/2016	Answering a coworker's question about an employee in LiB documents.	0.5	125	\$62.50	L140	AE
11/2/2016	Discovery analysis.	2.5	735	\$1,837.50	L390	JDF
11/2/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	9	125	\$1,125.00	L140	JWJ
11/2/2016	Downloaded the LIB – final translation documents of the SDI-B, PANA-C and Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/2/2016	Assist co-counsel with requests regarding expert materials; update case file with correspondence.	1	265	\$265.00	L140	BRM
11/2/2016	Call with LGC re personal emails of custodians.	1	605	\$605.00	L390	SES
11/3/2016	Analysis re settlement.	2.2	735	\$1,617.00	L160	JDF
11/3/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7	125	\$875.00	L140	JWJ
11/3/2016	Put the LIB – new production documents of LGC-MDL into collections. Downloaded the LIB – final translation documents of the Sanyo-C and SDI- B from LCHB. Renamed and saved in the Batteries shared folder.	0.4	150	\$60.00	L140	CL
11/3/2016	Destruction of inadvertently produced documents per defendant notice; update case file with correspondence.	1.3	265	\$344.50	L140	BRM
11/4/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	7	125	\$875.00	L140	JWJ
11/7/2016	LiB team meeting.	0.1	350	\$35.00	L140	JC
11/7/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with SES re assignments.	8	125	\$1,000.00	L140	JWJ

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/7/2016	Downloaded the LIB – final translation documents of the LGC-MDL and SDI-B from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/8/2016	Calendared depo dates.	0.3	265	\$79.50	L330	JSD
11/8/2016		1.5	265	\$397.50	L160	JSD
11/8/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/8/2016	Downloaded the LIB – final translation documents of the SDI-B and LGC- MDL from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/8/2016	Attend fairness hearing for Sony settlement with IPPs. Confer with Sony, <u>BG, JDF. Email SWB re same</u> .	4	605	\$2,420.00	L230	SES
11/8/2016		0.2	450	\$90.00	L160	BJS
11/9/2016	Attended weekly call to discuss upcoming class cert hearing.	0.5	420	\$210.00	L120	CLC
11/9/2016	Prepare for hearing on class certification (Daubert and pass-through issues).	10	735	\$7,350.00	L260	JDF
11/9/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/9/2016	Downloaded the LIB – final translation documents of the SDI-B, PANA-C and Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/9/2016	Organization of materials for possible use at hearing.	2.5	265	\$662.50	L140	BRM
11/9/2016	Call with co-leads; prepare for class certification hearing.	0.5	605	\$302.50	L120	SES
11/10/2016	Downloaded transcripts and exhibits.	1.5	265	\$397.50	L330	JSD
11/10/2016	Prepare for hearing on class certification (Daubert and pass-through issues).	11	735	\$8,085.00	L260	JDF
11/10/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/10/2016	Downloaded the LIB – final translation documents of the LGC-MDL, Sanyo, Sanyo-C, and SDI-B from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
11/10/2016	Organization of materials for hearing; update case file with pleadings and correspondence.	3.4	265	\$901.00	L140	BRM
11/10/2016		2.5	605	\$1,512.50	L160	CAO
11/11/2016	Prepare for hearing on class certification (Daubert and pass-through issues).	9.5	735	\$6,982.50	L260	JDF
11/11/2016		2	450	\$900.00	L160	BJS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/13/2016	Assist with hearing preparation.	2.6	265	\$689.00	L140	BRM
11/14/2016	Determined why South Dakota was not included in IPPs' complaint, and sent LC from LCHB response.	0.5	420	\$210.00	L120	CLC
11/14/2016	Prepared correct Appendices for the Class Cert. Motion.	1.5	265	\$397.50	L260	JSD
11/14/2016	Prepare for hearing on class certification (Daubert and pass-through issues).	9.5	735	\$6,982.50	L260	JDF
11/14/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/14/2016	Downloaded the LIB – final translation documents of the LGC-MDL from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
11/14/2016	Prepare for class certification hearing.	6.5	265	\$1,722.50	L230	BRM
11/14/2016	Work on LGC escrow account.	1	605	\$605.00	L160	CAO
11/14/2016	Confer with co-lead counsel and with experts regarding discovery obtained following reply brief in support of class certification; draft summary regarding same; review and edit chart of subpoenas issued to third parties.	2.3	575	\$1,322.50	L260	JCP
11/14/2016	Edited LG Chem settlement agreement.	2.1	450	\$945.00	L160	BJS
11/15/2016	Attend and argue at hearing on class certification (Daubert and pass-through issues).	9.2	735	\$6,762.00	L260	JDF
11/15/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/15/2016	Prepare for and attend class certification hearing.	9	265	\$2,385.00	L230	BRM
11/15/2016	Attend hearing on class certification of IPP and DPP classes; Daubert motions re Leamer, Abrantes-Metz and Noll.	7.5	605	\$4,537.50	L230	SES
11/17/2016	Discovery analysis.	2.5	735	\$1,837.50	L390	JDF
11/17/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/17/2016	Drafted preliminary approval motion.	0.3	450	\$135.00	L160	BJS
11/17/2016	Discussed LG Chem motion for preliminary approval with Shana Scarlett.	0.5	450	\$225.00	L160	BJS
11/18/2016	Formatted and proofed Reply ISO Motion for Final Approval of Settlement.	1.5	265	\$397.50	L160	JSD
11/18/2016	Formatted and proofed Friedman Decl. ISO Prelim. approval of settlement with LG Chem.	1	265	\$265.00	L160	JSD
11/18/2016	Updated Batteries Class Rep Contact List.	2	265	\$530.00	L210	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/18/2016		1.2	735	\$882.00	L160	JDF
11/18/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/18/2016	Update case file with pleadings, discovery and correspondence; update contact list.	1	265	\$265.00	L140	BRM
11/18/2016	Review LGC settlement and admin declaration on Sony settlement; work on RFP for notice administration.	4	605	\$2,420.00	L160	CAO
11/18/2016	Drafted LG Chem motion for preliminary approval.	4.3	450	\$1,935.00	L160	BJS
11/19/2016	Work on questions from bidders on Notice admin RFP.	3	605	\$1,815.00	L160	CAO
11/20/2016	Work on questions from bidders on notice admin RFP.	2.5	605	\$1,512.50	L160	CAO
11/20/2016	Edited LG Chem motion for preliminary approval.	2.3	450	\$1,035.00	L160	BJS
11/21/2016	Drafted email to all class regarding settlement with LG Chem requesting that they provide their approval of the settlement.	0.5	420	\$210.00	L120	CLC
11/21/2016	Reviewed LG Chem settlement in anticipation of drafting email to all class reps and their counsel to obtain their approval of the settlement.	0.6	420	\$252.00	L120	CLC
11/21/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/21/2016	Update case file with discovery, pleadings and correspondence.	1.2	265	\$318.00	L140	BRM
11/21/2016	Work on Notice RFP responses and questions.	3.5	605	\$2,117.50	L160	CAO
11/21/2016	Drafted LG Chem motion for preliminary approval.	7.5	450	\$3,375.00	L160	BJS
11/22/2016	Responded to inquiries regarding LG Chem settlement from class reps.	0.5	420	\$210.00	L120	CLC
11/22/2016	Formatted and proofed Proposed Order Granting Prelim. Approval of Settlement with LG Chem, motion for prelim. approval of settlement.	1	265	\$265.00	L160	JSD
11/22/2016	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	1.5	735	\$1,102.50	L390	JDF
11/22/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/22/2016	Work on Notice RFP process and work on LGC forms for settlement payment and escrow account.	4.5	605	\$2,722.50	L160	CAO
11/22/2016	Drafted LG Chem motion for preliminary approval motion.	6	450	\$2,700.00	L160	BJS
11/23/2016	Responded to inquiries regarding the LG Chem settlement from attorneys from the class reps.	0.1	420	\$42.00	L120	CLC

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/23/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	5	125	\$625.00	L140	JWJ
11/23/2016	Work on RFP process and review all responses.	5	605	\$3,025.00	L160	CAO
11/27/2016	Work on Notice bid evaluations.	3	605	\$1,815.00	L160	CAO
11/28/2016	Responded to a number of inquiries from class reps and their attorneys regarding the LG Chem settlement.	1.2	420	\$504.00	L120	CLC
11/28/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with CLC re assignments.	8	125	\$1,000.00	L140	JWJ
11/28/2016	Work on notice bid evaluations, notice plan and escrow account.	6.5	605	\$3,932.50	L160	CAO
11/28/2016	Emailed among co-counsel regarding LG Chem settlement papers and briefing.	0.5	450	\$225.00	L160	BJS
11/29/2016	Responded to class reps and their counsels' questions regarding the LG Chem settlement.	1.6	420	\$672.00	L120	CLC
11/29/2016	Communicated with class reps and their counsel in order to receive approval of the LG Chem settlement and answer their questions.	1.3	420	\$546.00	L120	CLC
11/29/2016	Met with third parties regarding production of transactional data in response to IPPs' subpoena.	1.1	420	\$462.00	L120	CLC
11/29/2016	Spoke with regarding providing approval of the LG Chem settlement.	0.2	420	\$84.00	L120	CLC
11/29/2016	Spoke with class representation regarding his approval of the LG settlement.	0.2	420	\$84.00	L120	CLC
11/29/2016	Corresponded with Cristina Fernandez regarding filing with the Court all sealing requests from defendants and third parties in order to strategize how best to handle the drafting and filing the administrative motion to seal.	0.3	420	\$126.00	L120	CLC
11/29/2016	Proofed, fact- and quote checked and autocited motion for prelim. approval of settlement and proposed order.	5.2	265	\$1,378.00	L160	JSD
11/29/2016	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	3.2	735	\$2,352.00	L390	JDF
11/29/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/29/2016	Update case file with correspondence, pleadings and discovery; assist attorneys with document/issue requests.	2.1	265	\$556.50	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
11/29/2016	Work on notice bid evaluations, notice plan and escrow account.	4	605	\$2,420.00	L160	CAO
11/30/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
11/30/2016	Downloaded the LIB - final translation documents of the Sony, SDI-B, LGC, Sanyo, and TSB-LIB from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
11/30/2016	Work on notice bid evaluations, notice plan and escrow agreement.	5.5	605	\$3,327.50	L160	CAO
11/30/2016	Edit motion for preliminary approval of LG Chem settlement; edit proposed order in support of same. Email to co-leads and team at HBSS.	4.3	605	\$2,601.50	L210	SES
11/30/2016	Call with co-leads re strategy, upcoming depositions, assignments and class certification hearing.	0.5	605	\$302.50	L120	SES
11/30/2016	Edited LG Chem settlement papers and motion.	1.5	450	\$675.00	L160	BJS
12/1/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
12/1/2016	Update case file with pleadings and correspondence.	1.2	265	\$318.00	L140	BRM
12/1/2016	Work on escrow agreement and notice plan.	4	605	\$2,420.00	L160	CAO
12/1/2016	Drafted LG Chem preliminary approval settlement papers.	2	450	\$900.00	L160	BJS
12/2/2016	Proofed, quote-checked and fact-checked prelim. approval of LG Settlement.	4	265	\$1,060.00	L160	JSD
12/2/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
12/2/2016	Work on notice plan, declaration and costs.	4	605	\$2,420.00	L160	CAO
12/2/2016	Edit LGC notices of settlement; edit motion for preliminary approval of settlement with LGC.	1.5	605	\$907.50	L160	SES
12/2/2016	LG Chem preliminary settlement approval issues.	4	450	\$1,800.00	L160	BJS
12/4/2016	Work on notice plan, declaration and costs.	2	605	\$1,210.00	L160	CAO
12/4/2016	Organize preliminary approval documents for filing.	1.2	450	\$540.00	L160	BJS
12/5/2016	Reviewed documents and prepared deposition chronology for YS Kim (LGC); Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee; attend meeting with CLC re assignments.	8	125	\$1,000.00	L140	JWJ
12/5/2016	Downloaded the LIB – final translation of LGC-MDL translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/5/2016	Assist with preparation of settlement approval brief and supporting documents; update case file with pleadings and correspondence.	3.2	265	\$848.00	L160	BRM
12/5/2016	Work on Notice plan, declaration, exhibits and costs.	7.5	605	\$4,537.50	L160	CAO
12/5/2016	Reviewed settlement administration.	0.4	450	\$180.00	L160	BJS
12/6/2016	Formatted and proofed Friedman Declaration and proposed order. Organized files and exhibits and efiled the same.	3	265	\$795.00	L160	JSD
12/6/2016	Proofed, quote-checked and fact-checked prelim. approval of LG Settlement and efiled the same.	3.5	265	\$927.50	L160	JSD
12/6/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
12/6/2016	Assist with review of third-party productions for reproduction in related case; update case file with correspondence.	1.5	265	\$397.50	L140	BRM
12/6/2016	Help to finalize preliminary approval papers and notice declaration.	6	605	\$3,630.00	L160	CAO
12/6/2016	Drafted motion for preliminary approval of settlement.	6.3	450	\$2,835.00	L160	BJS
12/7/2016		2.3	735	\$1,690.50	L160	JDF
12/7/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
12/7/2016	Assist co-counsel with document production issues; update case file with correspondence.	2	265	\$530.00	L140	BRM
12/7/2016	Work on escrow account.	1	605	\$605.00	L160	CAO
12/7/2016		0.9	450	\$405.00	L160	BJS
12/7/2016		5.8	450	\$2,610.00	L160	BJS
12/8/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
12/8/2016	Downloaded the LIB – final translation of SDI-B translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/8/2016	Update case file with correspondence and discovery.	1	265	\$265.00	L140	BRM
12/9/2016	Reviewed documents and prepared deposition chronology for Albert Kim; Reviewed supplemental LGC productions for JH Lee, JM Park, Deuk Yong Kwon, JK Lee.	8	125	\$1,000.00	L140	JWJ
12/9/2016	Update case file with correspondence and pleadings.	1.2	265	\$318.00	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/9/2016	Discovery conference with SDI re instructions not to answer at NS Choi deposition.	0.2	605	\$121.00	L390	SES
12/12/2016	Work to finalize LGC Escrow.	1.5	605	\$907.50	L160	CAO
12/13/2016	Downloaded the LIB – final translation of Sanyo-C translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/13/2016	Work to finalize LGC escrow.	1	605	\$605.00	L160	CAO
12/14/2016	Attn discovery;	2.4	735	\$1,764.00	L160	JDF
12/14/2016	Process document productions for loading into Catalyst database; coordinate with co-counsel regarding same; update case file with pleadings and correspondence.	2.3	265	\$609.50	L140	BRM
12/14/2016	Work to confirm payment due date from LGC.	0.5	605	\$302.50	L160	CAO
12/14/2016	Meet and confer with SDI re documents relating to EC investigation of Batteries cartel, and production of antitrust policies. Email to co-lead counsel re same and confer with DPPs regarding strategy.	1	605	\$605.00	L390	SES
12/14/2016	Call with co-lead counsel regarding strategy and settlements.	0.3	605	\$181.50	L120	SES
12/16/2016	Update case file with correspondence and pleadings.	0.9	265	\$238.50	L140	BRM
12/19/2016	Update case file with correspondence; update case calendar.	1.6	265	\$424.00	L140	BRM
12/19/2016		0.5	450	\$225.00	L160	BJS
12/20/2016	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	2.2	735	\$1,617.00	L390	JDF
12/20/2016	Downloaded the LIB – final translation of SNA, SDI-B, Sanyo-C, and Master Tracking List for CTs and Informals from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/20/2016	update case file with correspondence and pleadings.	2.6	265	\$689.00	L160	BRM
12/20/2016	Obtaining approval of class representatives for Hitachi agreement.	1.7	450	\$765.00	L160	BJS
12/20/2016		1.3	450	\$585.00	L160	BJS
12/21/2016	Downloaded the LIB – final translation of LGC-MDL translation documents from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/21/2016		0.2	450	\$90.00	L160	BJS
12/22/2016	Downloaded the LIB – final translation of LGC-MDL and the LIB Master Tracking List for CTs and Informals from LCHB and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
12/22/2016	Update case file with pleadings, discovery and correspondence; download certified translations for uploading into document review database.	4.5	265	\$1,192.50	L140	BRM

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
12/23/2016	Update case file with pleadings and correspondence.	1.2	265	\$318.00	L140	BRM
12/27/2016	Update case file with pleadings, correspondence and discovery.	2.3	265	\$609.50	L140	BRM
1/3/2017	Prepared NOA for BJS and efiled the same.	0.6	265	\$159.00	L210	JSD
1/3/2017	Reviewed deposition invoices.	1	265	\$265.00	L120	JSD
1/3/2017		1.3	735	\$955.50	L160	JDF
1/3/2017	Downloaded the LIB – final translation documents of Sanyo and S-DOJ from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
1/3/2017	Review and work on amended notices for Hitachi and NEC settlements.	1	605	\$605.00	L160	CAO
1/3/2017	Edited motion for preliminary approval of Hitachi and NEC settlements.	1.9	450	\$855.00	L160	BJS
1/3/2017	Edited settlement notices.	1.1	450	\$495.00	L160	BJS
1/4/2017	Formatted and proofed Stipulation and Proposed Order re Resetting of Hearing of Motion for Prelim. Approval of Settlement.	1	265	\$265.00	L160	JSD
1/4/2017	Formatted, cite-checked and proofed statement of recent decision, and efiled the same.	1.5	265	\$397.50	L210	JSD
1/4/2017	Updated calendar.	0.3	265	\$79.50	L120	JSD
1/4/2017	Process defendant document productions; update case file with <u>correspondence</u> ; update document production log.	1.3	265	\$344.50	L140	BRM
1/4/2017		1	605	\$605.00	L160	CAO
1/4/2017	Drafted stipulation and proposed order moving hearing date on motion for preliminary approval.	1.3	450	\$585.00	L160	BJS
1/4/2017		1.9	450	\$855.00	L160	BJS
1/5/2017	Downloaded transcripts and exhibits and saved the latter in master depo exhibits repository.	2	265	\$530.00	L120	JSD
1/5/2017	Updated and proofed Stipulation and Proposed Order re Resetting of Hearing <u>of Motion for Prelim</u> . Approval of Settlement and efiled the same.	2	265	\$530.00	L160	JSD
1/5/2017		2.2	735	\$1,617.00	L160	JDF
1/5/2017	Downloaded the LIB – final translation documents of Sony-LIB and Sanyo-C from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
1/5/2017	Edit motion for preliminary approval.	1.4	450	\$630.00	L160	BJS
1/6/2017	Updated service list.	0.3	265	\$79.50	L210	JSD
1/6/2017	Formatted and proofed Revised Stipulation and Proposed Order re Resetting of Hearing of Motion for Prelim. Approval of Set <u>tlement and efiled</u> the same.	1.5	265	\$397.50	L160	JSD
1/6/2017	Followed up with class representatives regarding	2.2	450	\$990.00	L160	BJS
1/9/2017		0.7	450	\$315.00	L160	BJS

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/9/2017		0.2	450	\$90.00	L160	BJS
1/9/2017	Descendenction of demonition of Source Hussen No.	0.2	265	\$90.00	L160 L330	JSD
1/10/2017	Prepared notice of deposition of Seung Hwan Na. Downloaded the LIB – final translation documents of SDI-B from LCHB.	0.7	205	\$185.50	L330	JSD
1/10/2017	Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
1/10/2017	Emailed class members regarding	0.3	450	\$135.00	L160	BJS
1/11/2017	Updated depo chart.	0.5	265	\$132.50	L330	JSD
1/11/2017	Updated calendar.	0.5	265	\$132.50	L120	JSD
1/11/2017	Review class certification hearing transcript; prepare e-mails regarding class certification.	2	475	\$950.00	L260	RP
1/12/2017	Updated notice of deposition Seung Hwan Na and served the same.	0.8	265	\$212.00	L330	JSD
1/12/2017	Downloaded the LIB – Final translation documents of Sanyo and LIB Master Tracking List for CTs from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
1/12/2017		1.7	450	\$765.00	L160	BJS
1/13/2017	Formatted and proofed settlement agreement and collected plaintiff counsel's signatures.	1	265	\$265.00	L160	JSD
1/13/2017		7.6	450	\$3,420.00	L160	BJS
1/16/2017		0.8	450	\$360.00	L160	BJS
1/16/2017	Read IPPs motion for class certification.	1	450	\$450.00	L260	BJS
1/17/2017		2.2	735	\$1,617.00	L160	JDF
1/17/2017	Update case file with pleadings and correspondence; review of defendant productions per co-counsel request regarding overlay productions.	1.6	265	\$424.00	L140	BRM
1/17/2017		0.7	450	\$315.00	L160	BJS
1/18/2017		0.8	950	\$760.00	L160	SWB
1/18/2017		1	265	\$265.00	L160	JSD
1/18/2017	Drafted motion for preliminary approval and associated papers of LG, NEC, and Hitachi settlements.	2.4	450	\$1,080.00	L160	BJS
1/19/2017	Prepared redline comparison of form notice.	1.5	265	\$397.50	L160	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/19/2017	Put the LIB – new production documents of SDI-B and Sanyo-C into collections in Catalyst. Updated the LIB – new production documents on the Batteries Assignments Master List. Downloaded the LIB – Final translation documents of Sanyo and LIB Master Tracking List for CTs from LCHB and saved in the Batteries shared folder.	0.4	150	\$60.00	L140	CL
1/19/2017	Work on new notices and claim form to tie all settlements together.	1.5	605	\$907.50	L160	CAO
1/19/2017	Drafted motion for preliminary approval and associated papers of LG, NEC, and Hitachi settlements.	6.5	450	\$2,925.00	L160	BJS
1/20/2017	Prepared notice of deposition.	0.7	265	\$185.50	L330	JSD
1/20/2017	Proofed, fact- and quote- checked motion for prelim. approval of settlement; prepared Friedman Declaration and proposed order.	2	265	\$530.00	L160	JSD
1/20/2017	Saved the LIB – Master Exhibit Index and the Master Tracking List for CTs.	0.1	150	\$15.00	L140	CL
1/20/2017	Assist co-counsel with requested deposition transcripts; update case file with missing transcript.	1.3	265	\$344.50	L330	BRM
1/20/2017	Work on new notices and claim form.	2	605	\$1,210.00	L160	CAO
1/20/2017	Drafted motion for preliminary approval and associated papers of LG, NEC, and Hitachi settlements.	5.4	450	\$2,430.00	L160	BJS
1/23/2017	Proofed, fact- and quote- checked motion for prelim. approval of settlement; updated Friedman Declaration and proposed order.	2.5	265	\$662.50	L160	JSD
1/23/2017	Team meeting led by Shana Scarlett.	0.5	125	\$62.50	L140	JWJ
1/23/2017	Downloaded the LIB – final translation document of Sanyo and S-DOJ from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
1/23/2017	Drafted motion for preliminary approval and associated papers of LG, NEC, and Hitachi settlements.	2.9	450	\$1,305.00	L160	BJS
1/24/2017	Proofed motion for prelim. approval of settlement, Friedman Declaration and proposed order and efiled the same.	3	265	\$795.00	L160	JSD
1/24/2017		1.2	735	\$882.00	L160	JDF
1/24/2017	Attn. fact discovery.	2.3	735	\$1,690.50	L390	JDF
1/24/2017	Downloaded the LIB – final translation document of Sanyo, SANYO-C, and S-DOJ from LCHB. Renamed and saved in the Batteries shared folder. Downloaded the LIB – Seung Won Lee's transcripts and exhibits.	0.3	150	\$45.00	L140	CL
1/24/2017	Assist with preparation of preliminary settlement approval briefing.	0.8	265	\$212.00	L160	BRM
1/24/2017	Work on preliminary approval papers for new settlements with LGC, NEC and Hitachi.	5	605	\$3,025.00	L160	CAO

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
1/24/2017	Drafted motion for preliminary approval and associated papers of LG, NEC, and Hitachi settlements.	3.3	450	\$1,485.00	L160	BJS
1/24/2017	Drafted motion for preliminary approval and associated papers of LG, NEC, and Hitachi settlements.	0.9	450	\$405.00	L160	BJS
1/25/2017	Updated joint notice of deposition, served the same and arranged for its coverage.	1	265	\$265.00	L330	JSD
1/25/2017	Reviewed documents and prepared deposition chronology for SH Na (SDI).	0.5	125	\$62.50	L140	JWJ
1/25/2017	Assist defendant counsel with re-submission of class certification briefs and supporting documents.	0.3	265	\$79.50	L260	BRM
1/26/2017	Reviewed documents and prepared deposition chronology for SH Na (SDI).	8	125	\$1,000.00	L140	JWJ
1/26/2017	Checked for the LIB translation documents and pulled out the LIB – SHNA deposition set and sent to Rio. Downloaded the LIB – final translation documents of S-DOJ, Sanyo, and Sanyo-C, and Master Tracking List from LCHB. Renamed and saved in the Batteries shared folder.	1	150	\$150.00	L140	CL
1/26/2017	Organization of translated documents for loading into document review database.	0.8	265	\$212.00	L140	BRM
1/26/2017	Review documents for S.H. Na deposition.	2.5	475	\$1,187.50	L330	RP
1/27/2017	Downloaded the LIB Master Tracking List and final translation documents of Sony-LIB, S-DOJ, Sanyo, and Sanyo-C from LCHB. Renamed and saved the Batteries shared folder.	0.3	150	\$45.00	L140	CL
1/30/2017	Downloaded transcripts and exhibits and saved the latter in master depo exhibits repository.	2.5	265	\$662.50	L120	JSD
1/30/2017	Reviewed documents and prepared deposition chronology for SH Na (SDI).	8	125	\$1,000.00	L140	JWJ
1/30/2017	Downloaded the LIB – final translation documents of Sony from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
1/30/2017	Prepare deposition chart; prepare correspondence regarding deposition chart for SH Na (SDI) deposition.	3.4	475	\$1,615.00	L330	RP
1/31/2017	Reviewed documents and prepared deposition chronology for SH Na (SDI).	8	125	\$1,000.00	L140	JWJ
1/31/2017	Review deposition transcripts.	1.2	475	\$570.00	L330	RP
2/1/2017	Reviewed docket and updated service list.	0.6	265	\$159.00	L120	JSD
2/1/2017	Reviewed documents and prepared deposition chronology for SH Na (SDI).	2.5	125	\$312.50	L140	JWJ
2/1/2017	Downloaded the LIB – final translation documents of HML-P, LGC- MDL, MAX-P, NECT, PANA, Sanyo, and S-DOJ from LCHB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/2/2017		2.2	735	\$1,617.00	L160	JDF
2/2/2017	Prepare for Seung Hwan Na deposition.	3	475	\$1,425.00	L330	RP
2/6/2017	Updated and cleaned up calendar.	0.7	265	\$185.50	L120	JSD
2/6/2017	Downloaded depo transcripts and exhibits and saved the same to file site.	2	265	\$530.00	L120	JSD
2/6/2017	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	3.4	735	\$2,499.00	L330	JDF
2/7/2017	Downloaded the LIB – Master Tracking List for CTs and saved in the Batteries folder.	0.1	150	\$15.00	L140	CL
2/7/2017	Review materials in preparation for Seung Hwan Na deposition.	4.3	475	\$2,042.50	L330	RP
2/8/2017	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	2.2	735	\$1,617.00	L390	JDF
2/9/2017	Updated the LIB – Sony new production documents on the Master Assignment chat. Uploaded new production documents of Sony into collections on Catalyst. Downloaded the LIB – Master Tracking List for CTs from LCHB and saved in the Batteries folder.	0.5	150	\$75.00	L140	CL
2/13/2017	Downloaded the LIB – final translation documents of Sony-LIB and Master Tracking List for CTs and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/13/2017	Process document production for loading into document review database.	0.4	265	\$106.00	L140	BRM
2/14/2017		1.2	735	\$882.00	L160	JDF
2/14/2017	Updated the LIB - new production documents of SANYO-C on the Batteries Assignment chart. Put the LIB – new production documents of SANYO-C into collections on Catalyst.	0.2	150	\$30.00	L140	CL
2/14/2017	Update case file with pleadings.	0.3	265	\$79.50	L140	BRM
2/15/2017	Reviewed invoices and transmitted the same for payment.	1	265	\$265.00	L120	JSD
2/15/2017	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	1.3	735	\$955.50	L390	JDF
2/16/2017	Downloaded transcripts and exhibits and saved them to case file.	1.2	265	\$318.00	L120	JSD
2/16/2017	Downloaded the LIB – final translation documents of LGC-MDL and Sony- LIB from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/16/2017	Prepare certified translations for loading into document review database.	1.1	265	\$291.50	L140	BRM
2/16/2017	Prepare for Seung Hwan Na deposition.	3.2	475	\$1,520.00	L330	RP
2/16/2017	Conference call to discuss Seung Hwan Na deposition.	0.3	475	\$142.50	L330	RP
2/17/2017	Work on distribution and notice plans.	2	605	\$1,210.00	L160	CAO
2/17/2017	Prepared for deposition of Jae Kil (Albert) Kim; reviewed documents, selected exhibits and drafted outline.	0.3	450	\$135.00	L330	BJS
2/20/2017	Prepare for deposition of Seung Hwan Na.	2	475	\$950.00	L330	RP
2/21/2017	Downloaded exhibits and transcripts and saved to file site.	1.5	265	\$397.50	L120	JSD

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Date	Detailed Narrative	Time Billed	Hourly Rate	Total Billed	Task Code	Timekeeper
2/21/2017	Reviewed documents and prepared deposition chronology for Albert Kim (LGC).	8	125	\$1,000.00	L330	JWJ
2/21/2017		0.4	475	\$190.00	L330	RP
2/21/2017	Prepare for Seung Hwan Na deposition.	5.7	475	\$2,707.50	L330	RP
2/22/2017	Prepared binder for JDF of preliminary approval papers.	3.5	265	\$927.50	L230	JSD
2/22/2017	Prepare for deposition of Jae Kil (Albert) Kim (LGC).	1.5	735	\$1,102.50	L390	JDF
2/22/2017	Reviewed documents and prepared deposition chronology for Albert Kim (LGC).	4	125	\$500.00	L330	JWJ
2/22/2017	Put the LIB – new SDI-B production document into collections. Updated the LIB – SDI-B new production document on the Master Assignment chart. Downloaded the LIB – final translation documents of LGC-MDL and Sony-LIB. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
2/22/2017	Prepare for and attend deposition of Seung Hwan Na.	10	475	\$4,750.00	L330	RP
2/22/2017	Emailed regarding settlement papers.	0.2	450	\$90.00	L160	BJS
2/23/2017	Reviewed docket and updated service list.	1	265	\$265.00	L120	JSD
2/23/2017	Downloaded the LIB – final translation documents of Sony-LIB, SDI-B, LGC-MDL, and Master Tracking List for CTs. Renamed and saved in the Batteries shared folder.	0.2	150	\$30.00	L140	CL
2/24/2017	Downloaded the LIB – final translation documents of LGC-MDL, Sony-LIB, and the Master Tracking List for CTs from LCHB. Renamed and saved in the Batteries shared folder.	0.1	150	\$15.00	L140	CL
2/24/2017	Process document production for loading into document review database; prepare certified translations for loading into document review database.	2.1	265	\$556.50	L140	BRM
2/27/2017	Attn. settlement prep. hearing.	2.2	735	\$1,617.00	L230	JDF
2/27/2017	Assist with hearing preparation.	0.9	265	\$238.50	L230	BRM
2/28/2017	Attend and argue on behalf of IPPs at hearing on preliminary approval of settlements with LG Chem, NEC, and Hitachi Maxell.	2.5	735	\$1,837.50	L230	JDF
2/28/2017	Work on notice plan.	2	605	\$1,210.00	L160	CAO

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EXHIBIT 2

IN RE: LITHIUM ION BATTERIES INDIRECT TIME REPORT FIRM NAME: HAGENS BERMAN SOBOL SHAPIRO LLP

REPORTING PERIOD: June 1, 2013 through February 28, 2017

ATTODNEVC	(1)	(2)	(2)	(4)	(1)	(7)	(0)	(0)	(10)	(11)	(12)	(12)	(14)	TOTAL	HOURLY	
(7) Document Review			1		 (14) Court	Appearar	nce and Pr	ер			1			1	CURRENT	<u> </u>
(6) Discovery Meet & Confer					(13) Trial P	reparation	and Trial							(T) Translator		
(5) Deposition Defending					(12) Nego	tiating Sett	tlements							(L) Librarian		
(4) Deposition Taking					(11) Litigat	tion Strateg	gy, Analysis	s & Case M	anagemei	nt				(PL) Paralegal		
(3) Drafting Discovery Answers/	/Responses	S			(10) Class	Certificatio	on / Expert	S						(LC) Law Clerk		
(2) Drafting Discovery Requests	s				(9) Readir	ng/Reviewi	ng Pleadin	ıgs, Briefs, E	Discovery, T	ranscripts,	etc.			(A) Associate		
(1) Investigations, Factual Rese	earch				(8) Draftin	g Pleading	js, Briefs & I	Pretrial Mot	ions					(P) Partner		

ATTORNEYS	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	TOTAL HOURS	HOURLY RATES	LODESTAR
P - Steve Berman	0.50					2.20	2.00	26.20		2.50	11.60	15.30		56.50	116.80	950.00	110,960.00
P - Jeff Friedman	16.70	8.00	12.30	140.00		231.35	29.10	163.05	15.00	262.70	60.40	36.10		79.15	1053.85	735.00	774,579.75
P - George Sampson							5.30		14.60						19.90	650.00	12,935.00
P - Shana Scarlett	6.60	40.80	2.90	269.30		371.55	29.70	298.30		122.80	57.10	15.80		49.65	1264.50	605.00	765,022.50
P - Chris O'Hara												94.50			94.50	605.00	57,172.50
A - Jon King	17.90					43.90		34.00	383.10		36.30			16.00	531.20	600.00	318,720.00
P - Ivy Tabbara		0.50		40.80		1.90									43.20	575.00	24,840.00
A - Jerrod Patterson		34.80	16.40	42.70		178.90	4.10	77.90		10.60	14.60			16.00	396.00	575.00	227,700.00
P - Ronnie Spiegel				45.10			2535.40		1.00						2581.50	550.00	1,419,825.00
A - Rio Pierce				36.00						2.00					38.00	475.00	18,050.00
A- Jeff Lang							695.20								695.20	450.00	312,840.00
A - Matthew Smith	6.70		0.50	57.00			0.30	46.80		16.30	0.70			1.00	129.30	450.00	58,185.00
A - Benjamin Siegel				0.30						1.00		97.80			99.10	450.00	44,595.00
A- Alexander Su		82.90	15.50						12.10		67.20				177.70	425.00	75,522.50
A - Colleen Cleary	39.60	15.10	7.20	81.80		5.80	56.00	206.10		71.50	77.60	2.20			562.90	420.00	236,418.00
A - Meghan Lang	23.00														23.00	400.00	9,200.00
A - Jongguk Choi				30.70			1769.50			16.20					1816.40	350.00	635,740.00
A- Helen Hsu							1340.30								1340.30	350.00	469,105.00
A- Patrick Ryan							339.70								339.70	325.00	110,402.50
A- Adam Kreisel							477.00				0.80				477.80	300.00	143,340.00
Attorney totals:	111.00	182.10	54.80	743.70	0.00	835.60	7283.60	852.35	425.80	505.60	326.30	261.70	0.00	218.30	11800.85		5825152.75
PARALEGAL																	
PL - Brian Miller	0.80	1.80	3.40	46.70		5.40	849.20	51.60		72.00	31.80	6.60		16.40	1085.70	265.00	287,710.50
PL - Jeaneth Decena	12.65	83.60	37.30	54.40		288.15	38.45	371.30		52.50	129.00	38.90		3.50	1109.75	265.00	294,083.75
T - Amy Elder				0.30			2348.20				18.00				2366.50	125.00	295,812.50
T - Jessica Jeong				12.00			2733.00		2.50						2747.50	125.00	343,437.50
T - Chan Lovell						9.50	1400.80								1410.30	150.00	211,545.00
PARALEGAL TOTALS:	13.45	85.40	40.70	113.40	0.00	303.05	7369.65	422.90	2.50	124.50	178.80	45.50	0.00	19.90	8719.75		1432589.25
OVERALL TOTALS:	124.45	267.50	95.50	857.10	0.00	1138.65	14653.25	1275.25	428.30	630.10	505.10	307.20	0.00	238.20	20520.60		7257742.00

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EXHIBIT 3

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IN RE: LITHIUM ION BATTERIES INDIRECT TIME REPORT FIRM NAME: HAGENS BERMAN SOBOL SHAPIRO LLP

REPORTING PERIOD: June 1, 2013 through February 28, 2017

(1) Investigations, Factual Research								s, Briefs & Pi							(P) Partner		
(2) Drafting Discovery Requests							-	ng Pleading	gs, Briefs, Di	iscovery, Ir	anscripts, e	etc.			(A) Associate		
(3) Drafting Discovery Answers/Responses							Certificatio								(LC) Law Clerk		
(4) Deposition Taking							-	y, Analysis	& Case Ma	anagemen	t				(PL) Paralegal		
(5) Deposition Defending							tiating Settl								(L) Librarian		
(6) Discovery Meet & Confer							reparation								(T) Translator		
(7) Document Review			1			(14) Court	Appearan	ce and Pre	эр		1					HISTORICAL	
															TOTAL	HOURLY	
ATTORNEYS	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	HOURS	RATE	LODESTAR
P - Steve Berman (1/2016 - present)	. ,	. /	(1)			0.50	1.00		. ,	0.50	0.50	2.80	()	. ,	5.30	950.00	5,035.00
P - Steve Berman (6/2014 - 12/2015)						0.50		1.00			3.50	12.50		10.00	27.50	900.00	24,750.00
P - Steve Berman (6/2013 - 5/2014)	0.50					1.20	1.00	25.20		2.00	7.60			46.50	84.00	800.00	67,200.00
P - Jeff Friedman (1/2016 - present)	8.00	5.50	6.20	89.30		58.60				231.10	27.00	24.90		10.80	461.40	735.00	339,129.00
P - Jeff Friedman (6/2013 - 12/2015)	8.70	2.50	6.10	50.70		172.75	29.10	141.65	15.00	53.00	33.40	11.20		68.35	592.45	700.00	414,715.00
P - George Sampson							5.30		14.60						19.90	650.00	12,935.00
P - Shana Scarlett (1/2016 - present)		11.50		204.60		39.20	9.30	148.60		105.40	12.70	1.50		16.50	549.30	605.00	332,326.50
P - Shana Scarlett (6/2013 - 12/2015)	6.60	29.30	2.90	64.70		332.35	20.40	149.70		17.40	44.40	14.30		33.15	715.20	600.00	429,120.00
P - Chris O'Hara												94.50			94.50	605.00	57,172.50
A - Jon King	17.90					43.90		34.00	383.10		36.30			16.00	531.20	600.00	318,720.00
P - Ivy Tabbara		0.50		40.80		1.90									43.20	575.00	24,840.00
A - Jerrod Patterson		34.80	16.40	42.70		178.90	4.10	77.90		10.60	14.60			16.00	396.00	575.00	227,700.00
P - Ronnie Spiegel (10/2014 - present)				45.10			1335.50								1380.60	550.00	759,330.00
P - Ronnie Spiegel (6/2013 - 9/2014)							1199.90		1.00						1200.90	475.00	570,427.50
A - Rio Pierce				36.00						2.00					38.00	475.00	18,050.00
A- Jeff Lang (10/2014 - present)							195.60								195.60	450.00	88,020.00
A- Jeff Lang (6/2013 - 9/2014)							499.60								499.60	375.00	187,350.00
A - Matthew Smith	6.70		0.50	57.00			0.30	46.80		16.30	0.70			1.00	129.30	450.00	58,185.00
A - Benjamin Siegel				0.30						1.00		97.80			99.10	450.00	44,595.00
A- Alexander Su		82.90	15.50						12.10		67.20				177.70	425.00	75,522.50
A - Colleen Cleary (12/21/2015 - present	34.50	12.40	6.70	81.80		3.30	55.50	138.30		71.50	75.50	2.20			481.70	420.00	202,314.00
A - Colleen Cleary (6/2013 - 12/20/2015)	5.10	0.60	0.50			4.60	0.50	67.80			2.10				81.20	400.00	32,480.00
A - Meghan Lang	23.00														23.00	400.00	9,200.00
A - Jongguk Choi				30.70			1769.50			16.20					1816.40	350.00	635,740.00
A- Helen Hsu							1340.30								1340.30	350.00	469,105.00
A- Patrick Ryan							339.70								339.70	325.00	110,402.50
A- Adam Kreisel							477.00				0.80				477.80	300.00	143,340.00
ATTORNEY TOTALS:	111.00	180.00	54.80	743.70	0.00	837.70	7283.60	830.95	425.80	527.00	326.30	261.70	0.00	218.30	11800.85		5657704.50
PARALEGAL																	
PL - Brian Miller (1/2016 - present)		1.80	2.30	33.70		3.40	361.50	2.20		72.00	18.90	6.60		16.40	518.80	265.00	137,482.00
PL - Brian Miller (6/2013 - 12/2015)	0.80		1.10	13.00		2.00	487.70	49.40			12.90				566.90	250.00	141,725.00
PL - Jeaneth Decena (1/2016 - present)		1.70		54.40		113.70	17.20	185.10		52.50	77.60	37.90		3.50	543.60	265.00	144,054.00
PL - Jeaneth Decena (6/2013 - 12/2015)	12.65	217.85	37.30			38.50	21.25	186.20			51.40	1.00			566.15	250.00	141,537.50
T - Amy Elder				0.30			2348.20				18.00				2366.50	125.00	295,812.50
T - Jessica Jeong				12.00			2733.00		2.50						2747.50	125.00	343,437.50
T - Chan Lovell						9.50	1400.80								1410.30	150.00	211,545.00
PARALEGAL TOTALS:	13.45	221.35	40.70		0.00		7369.65	422.90	2.50		178.80	45.50	0.00	19.90	8719.75		1415593.50
OVERALL TOTALS:	124.45	401.35	95.50	857.10	0.00	1004.80	14653.25	1253.85	428.30	651.50	505.10	307.20	0.00	238.20	20520.60		7073298.00

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EXHIBIT 4

NAME: HAGENS BERMAN SOBOL SHAPIRO LLP

IN RE: LITHIUM ION BATTERIES INDIRECT

COST REPORT

REPORTING PERIOD: June 1, 2013 through February 28, 2017

CATEGORY	AMOUNT INCURRED
Attorney Service	
Court Costs	\$305.00
Document Production	
Experts/consultants	\$9,095.00
Federal Express	\$2,761.89
Hearing Transcripts	\$503.15
Investigation	
Lexis/westlaw	\$11,792.38
Messenger/delivery	\$6,255.50
Photocopies - In-House	\$5,881.25
Photocopies - Outside	\$294.34
Postage	
Service of Process	
Special Supplies	
Telephone/telecopier	
Travel	\$9,927.62
Miscellaneous	
TOTAL	\$46,816.13

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EXHIBIT 5

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B HAGENS BERMAN





EXPERIENCE. INNOVATION. RESULTS.





Hagens Berman is a national leader in class-action litigation driven by a team of legal powerhouses. With a tenacious spirit, we are motivated to make a positive difference in people's lives.

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MANAGING PARTNER

EXECUTIVE COMMITTEE

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SENIOR COUNSEL

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OF COUNSEL

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The Firm

Hagens Berman Sobol Shapiro LLP was founded in 1993 with one purpose: to help victims with claims of fraud and negligence that adversely impact a broad group of people. The firm initially focused on class action and other types of complex, multi-party litigation always representing plaintiffs/victims. As the firm grew, it expanded its scope while staying true to its mission of taking on important cases that implicate the public interest, and now represents plaintiffs including investors, consumers, inventors, workers, the environment, governments, whistleblowers and others.

We are one of the nation's leading class action law firms, and have earned an international reputation for excellence and innovation in groundbreaking litigation against large corporations.

OUR FOCUS. Our main focus is to represent plaintiffs/victims in securities and investment fraud, product liability, tort, antitrust, consumer fraud, employment, whistleblower, intellectual property, environmental, and employee pension protection cases. Our firm is particularly skilled at managing multi-state and nationwide class actions through an organized, coordinated approach that implements an efficient and aggressive prosecutorial strategy in order to place maximum pressure on the defendant.

WE WIN. We believe excellence stems from a commitment to try each case, vigorously represent the best interests of our clients, and obtain the maximum recovery. Our opponents know we are determined and tenacious and they respect our skills and recognize our track record of achieving top results.

WHAT MAKES US DIFFERENT. We achieve results—our track record proves it. While many class action or individual plaintiff cases result in large legal fees and no meaningful result for the client, Hagens Berman finds ways to return real value.

A NATIONWIDE REACH. The scope of our practice is truly nationwide. We have flourished through our network of offices in nine cities across the United States, including Seattle, Boston, Chicago, Colorado Springs, Los Angeles, New York, Phoenix, San Francisco, and Washington, D.C. Our reach is not limited to the cities where we maintain offices. We have cases pending in courts across the country, with substantial activity in California, New York, Washington, Arizona, Illinois, and Idaho.



SEATTLE

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LOS ANGELES

301 North Lake Avenue, Suite 920 Pasadena, CA 91101 (213) 330-7150 phone (213) 330-7152 fax

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SAN FRANCISCO

715 Hearst Avenue, Suite 202Berkeley, CA 94710(510) 725-3000 phone(510) 725-3001 fax

WASHINGTON, D.C.

1701 Pennsylvania Ave. NW, Suite 300 Washington, D.C. 20006 (202) 248-5403 phone (202) 580-6559 fax G ...the track record of Hagens Berman['s] Steve Berman is...
impressive, having racked...
a \$1.6 billion settlement in the Toyota Unintended Acceleration Litigation and a substantial number of really outstanding big-ticket results.

 Milton I. Shadur, Senior U.S. District Judge, naming Hagens Berman Interim Class Counsel in Stericycle Pricing MDL

6 Class counsel has consistently demonstrated extraordinary skill and effort. 9 9

 U.S. District Judge James Selna, Central District of California, In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices and Products Liability Litigation

6 Berman is considered one of the nation's top class-action lawyers.

- Associated Press

Elite Trial Lawyers 2014 & 2015, The National Law Journal

The Plaintiffs' Hot List: The Year's Hottest Firms 2006, 2007, 2009-2013 & 2015, The National Law Journal

Most Feared Plaintiffs Firms 2015. Law360

6 Landmark consumer cases are business as usual for Steve Berman.

 The National Law Journal, naming Steve Berman one of the 100 most influential attorneys in the nation for the third time in a row

66[A] **clear choice** emerges. That choice is the Hagens Berman firm. **99**

- U.S. District Court for the Northern District of California, In re Optical Disk Drive Products Antitrust Litigation (appointing the firm lead counsel)
- All right, I think I can conclude on the basis with my five years with you all, watching this litigation progress and seeing it wind to a conclusion, that the results are exceptional...
 You did an exceptionally good job at organizing and managing the case...
 - U.S. District Court for the Northern District of California, In re Dynamic Random Access Memory Antitrust Litigation (Hagens Berman was co-lead counsel and helped achieve the \$325 million class settlement)

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VISA-MASTERCARD ANTITRUST LITIGATION The firm served as co-lead counsel in what was then the largest antitrust settlement in history – valued at \$27 billion.

MCKESSON DRUG LITIGATION

Hagens Berman was lead counsel in these racketeering cases against McKesson for drug pricing fraud that settled for more than **\$444 million** on the eve of trials.

STATE OF WASHINGTON, ET AL. V. PHILIP MORRIS, ET AL.

Hagens Berman represented 13 states in the largest recovery in litigation history – **\$206B**.

DRAM ANTITRUST LITIGATION

The firm was co-lead counsel, and the case settled for **\$345 million** in favor of purchasers of dynamic random access memory chips (DRAM).

ENRON ERISA LITIGATION

Hagens Berman was co-lead counsel in this ERISA litigation, which recovered in excess of **\$250 million**, the largest ERISA settlement in history.

CHARLES SCHWAB SECURITIES LITIGATION The firm was lead counsel in this action alleging fraud in the management of the Schwab YieldPlus mutual fund; a **\$235 million** class settlement was approved by the court. AVERAGE WHOLESALE PRICE DRUG LITIGATION Hagens Berman was co-lead counsel in this ground-breaking drug pricing case against the world's largest pharmaceutical companies, resulting in a victory at trial. The court approved a total of **\$338 million** in settlements.

LUPRON CONSUMER LITIGATION Hagens Berman secured **\$150 million** settlement on behalf of patients using Lupron for prostate cancer.

EXPEDIA HOTEL TAXES AND FEES LITIGATION Hagens Berman obtained summary judgment in this class action to recover deceptive service fees and settled the case for **\$123.4 million**.

Practice Areas

PRACTICE AREAS Anti-Terrorism

With a long track record of upholding the rights of the voiceless, Hagens Berman fights for justice on behalf of victims of international terrorism. Our anti-terrorism legal team builds on our robust history to forge innovative cases against those that support terrorism.

Hagens Berman has always believed in fighting for the rights of those with no voice – those who are victims to tragic circumstances beyond their control. With our guiding principles driving our efforts, the firm has expanded its practice areas to include anti-terrorism litigation.

It's no secret that some businesses and individuals have pled guilty to violating United States laws that prohibit financial transactions with terrorist organizations and foreign states that support terrorism. We believe that the law is one of the most powerful tools to combat terrorism, and our renowned team of litigators brings a fresh perspective to the fight for victims' rights in this complex arena. Through a deep understanding of both U.S. and international anti-terrorism laws, Hagens Berman builds on its foundation to investigate acts of terrorism and forge ironclad cases against anyone responsible, to help ensure that those at the mercy of the world's most egregious perpetrators of violence are represented with the upmost integrity and determination.

The firm's new practice area carries out our mission of building a safer world through novel applications of the law and steadfast dedication.

Antitrust

Hagens Berman works to preserve healthy marketplace competition and fair trade by protecting consumers and businesses that purchase goods and services from price fixing, market allocation agreements, monopolistic schemes and other trade restraints. The firm's lawyers have earned an enviable reputation as experts in this often confusing and combative area of commercial litigation. Our attorneys have a deep understanding of the legal and economic issues within the marketplace, allowing us to employ groundbreaking market theories that shed light on restrictive, anti-competitive practices.

Hagens Berman represents millions of consumers in several high-profile class-action lawsuits, and takes on major antitrust litigation to improve market conditions for consumers, businesses and investors. We have represented plaintiffs in markets as diverse as debit and credit card services, personal computer components, electric and gas power, airlines, and internet services, and we have prevailed against some of the world's largest corporations.

The firm has also generated substantial recoveries on behalf of health plans and consumers in antitrust involving pharmaceutical companies abusing patent rights to block generic drugs from coming to market. Hagens Berman has served as lead or colead counsel in landmark litigation challenging anti-competitive practices, in the Paxil Direct Purchaser Litigation (\$100 million), Relafen Antitrust Litigation (\$75 million), Tricor Indirect Purchaser Antitrust Litigation (\$65.7 million), and Augmentin Antitrust Litigation (\$29 million). Representative antitrust successes on behalf of our clients include:

> Visa/MasterCard

Helped lead this record-breaking antitrust case against credit card giants Visa and MasterCard that challenged charges imposed in connection with debit cards.

RESULT: \$3.05 billion settlement and injunctive relief valued at more than \$20 billion.

> DRAM

Claiming DRAM (Dynamic Random Access Memory) manufacturers secretly agreed to reduce the supply of DRAM, a necessary component in a wide variety of electronics which artificially raised prices. The class included equipment manufacturers, franchise distributors and purchasers. **RESULT:** \$375 million settlement.

> Apple E-books

With state attorneys general, the firm secured a \$166 million settlement with publishing companies that conspired with Apple to fix e-book prices. Further settlement with Apple is pending. **RESULT:** \$560 million total settlement.

> EA Madden

Class action claimed that video game giant Electronic Arts used exclusive licensing agreements with various football organizations to nearly double the price of several of its games. **RESULT:** \$27 million settlement and imposed limits on EA's ability to pursue exclusive licensing agreements.

> AC Nielsen

Represented Information Resources, Inc. ("IRI"), in a suit claiming that AC Nielsen's anti-competitive practices caused IRI to suffer significant losses.

RESULT: \$55 million settlement.

PRACTICE AREAS Civil and Human Rights

Hagens Berman has represented individuals and organizations in difficult civil rights challenges that have arisen in the past two decades. In doing so, we have managed cases presenting complex legal and factual issues that are often related to highly charged political and historical events. Our clients have included such diverse communities as World War II prisoners of war, conscripted civilians and entire villages.

In this cutting-edge practice area, the firm vigilantly keeps abreast of new state and national legislation and case-law developments. We achieve positive precedents by zealously prosecuting in our clients' interests. Some examples of our work in this area include:

> World Trade Organization Protests

During the 1999 World Trade Organization (WTO) protests in Seattle, tens of thousands of Seattle citizens became targets after Seattle officials banned all forms of peaceful protest. Seattle police attacked anyone found in the designated "no protest" zones with rubber bullets and tear gas. Hundreds of peaceful protesters were arrested and incarcerated without probable cause for up to four days. The firm won a jury trial on liability and ultimately secured a settlement from Seattle officials after filing a class action alleging violations of the First and Fourth Amendments.

> Hungarian Gold Train

Following the firm's representation of former forced and enslaved laborers for German companies in the Nazi Slave Labor Litigation, Hagens Berman led a team of lawyers against the U.S. on behalf of Hungarian Holocaust survivors in the Hungarian Gold Train case. The suit claimed that, during the waning days of World War II, the Hungarian Nazi government loaded plaintiffs' valuable personal property onto a train, which the U.S. Army later seized, never returning the property to its owners and heirs.

> Dole Bananas

Hagens Berman filed suit against the Dole Food Company, alleging that it misled consumers about its environmental record. The complaint alleged that Dole purchased bananas from a grower in Guatemala that caused severe environmental damage and health risks to local residents. Dole ultimately agreed to take action to improve environmental conditions, collaborating with a non-profit group on a water filtration project for local communities.

> Chiquita Bananas

Hagens Berman filed suit against Chiquita Brands International, alleging that it also misled consumers about its environmental record. The complaint alleges that Chiquita purchased bananas from a grower in Guatemala that caused severe environmental damage and health risks to local residents.

PRACTICE AREAS Consumer Protection - General Class Litigation

Hagens Berman is a leader in protecting consumers, representing millions in large-scale cases that challenge unfair, deceptive, and fraudulent practices.

We realize that often-voiceless consumers suffer the brunt of corporate wrongdoing and have little power to hold companies responsible or to change those tactics.

Hagens Berman pursues class litigation on behalf of clients to confront fraudulent practices that consumers alone cannot effectively dispute. We make consumers' concerns a priority, collecting consumer complaints against suspected companies and exploring all avenues for prosecution.

Hagens Berman's legacy of protecting consumer rights reflects the wide spectrum of scams that occur in the marketplace. The cases that we have led have challenged a variety of practices such as:

- > False billing and over-charging by credit card companies, banks, telecommunications providers, power companies, hospitals, insurance plans, shipping companies, airlines and Internet companies
- > Deceptive practices in selling insurance and financial products and services such as life insurance and annuities
- > Predatory and other unfair lending practices, and fraudulent activities related to home purchases
- A few case examples are:

> Expedia Hotel Taxes and Service Fees Litigation

Hagens Berman led a nationwide class-action suit arising from bundled "taxes and service fees" that Expedia collects when its consumers book hotel reservations. Plaintiffs alleged that by collecting exorbitant fees as a flat percentage of the room rates, Expedia violated both the Washington Consumer Protection Act and its contractual commitment to charge as service fees only "costs incurred in servicing" a given reservation.

RESULT: Summary judgment in the amount of \$184 million. The case settled for cash and consumer credits totaling \$123.4 million.

> Tenet Healthcare

In a pioneering suit filed by Hagens Berman, plaintiffs alleged that Tenet Healthcare charged excessive prices to uninsured patients at 114 hospitals owned and operated by Tenet subsidiaries in 16 different states.

RESULT: Tenet settled and agreed to refund to class members amounts paid in excess of certain thresholds over a four-and-ahalf year period.

> Hyundai Kia

Hagens Berman sued Hyundai and Kia on behalf of owners after the car manufacturers overstated the MPG fuel economy ratings on 900,000 of its cars. The suit seeks to give owners the ability to recover a lump-sum award for the lifetime extra fuel costs, rather than applying every year for that year's losses.

RESULT: The result was a lump-sum payment plan worth \$400 million on a cash basis, and worth even more if owners opt for store credit (150% of cash award) or new car discount (200% of cash award) options.

PRACTICE AREAS Consumer Protection - General Class Litigation

> Equity-Indexed Annuities

Hagens Berman has sued a number of insurers, alleging that they knowingly engaged in an unethical and fraudulent scheme targeted towards senior citizens. The lawsuits allege that the insurers exploit customers' fears of outliving their assets and push them into deferred annuities that tie up their investments and savings for 10 to 20 years. These annuity products carry large surrender charges and create complications for loved ones dealing with estates when family members pass.

RESULT: In settlements valued at \$129 million and \$80 million respectively, American Equity Investment Life Insurance Company and Midland National Insurance Company agreed to significantly reduce surrender charge penalties under certain circumstances (in some instances up to a 100% reduction), refund a portion of surrender charges paid, and provide annuitization bonuses.

> Consumer Insurance Litigation

Hagens Berman has pioneered theories to ensure that in firstand third-party contexts consumers and health plans always receive the treatment and benefits to which they are entitled. Many of our cases have succeeded in expanding coverage owed and providing more benefits; recovering underpayments of benefits; and returning uninsured/underinsured premiums from the misleading tactics of the insurer.

PRACTICE AREAS Consumer Protection - Defective Product Litigation

When a product fails to meet accepted or advertised standards, the results can be costly, hazardous or even deadly. In such cases, consumers deserve relief. Hagens Berman is nationally recognized for successful prosecution of lawsuits involving a wide range of such defective products, from faulty building and home products to defective cars, computers, software, electronics, and toys.

The federal court overseeing the massive multi-district litigation against Toyota appointed the firm to co-lead one of the largest consolidations of class-action cases in U.S. history. The litigation combined more than 300 state and federal suits concerning acceleration defects tainting Toyota vehicles. Hagens Berman and its two co-lead firms were selected from more than 70 law firms applying for the role. Select firm successes representing consumers in defective product class litigation include:

> Toyota Sudden, Unintended Acceleration Litigation

Co-lead counsel for the economic loss class in this lawsuit filed on behalf of Toyota owners alleging a defect causes vehicles to undergo sudden, unintended acceleration. In addition to safety risks, consumers suffered economic loss from decreased value of Toyota vehicles following media coverage of the alleged defect. **RESULT:** Settlement package valued at up to \$1.6 billion.

> Louisiana-Pacific Siding Litigation

Served as co-lead counsel in a nationwide case involving defective siding installed on 800,000 homes that soaked up moisture, resulting in swelling and cracking. **RESULT:** More than 130,000 claims have been paid exceeding \$500 million in total.

> Polybutylene Pipe Litigation

This litigation charged Shell Oil Company, E. I. du Pont de Nemours and Hoescht Celanese with manufacturing and marketing defective polybutylene pipes and plumbing systems. Hagens Berman served as co-lead counsel for the class. **RESULT:** A settlement providing a minimum of \$950 million, which, at the time, was the largest class-action settlement of its kind.

> Nissan Quest Accelerator Litigation

Represented Nissan Quest minivan owners who alleged that their vehicles developed deposits in a part of the engine, causing drivers to apply increased pressure to push the accelerator down. **RESULT:** Settlement providing reimbursement for cleanings or replacements and applicable warranty coverage.

> Hyundai Horsepower Litigation

Co-lead counsel in a class-action lawsuit against Hyundai that claimed the company overstated the horsepower of 1.3 million vehicles and inflated the value of certain Hyundai models. **RESULT:** Owners of each vehicle will receive up to \$225 in cash or up to \$325 in credit with Hyundai dealers. The cost of the settlement to Hyundai ranges from \$76 million to \$127 million.

The firm's current cases involving product defects include:

> General Motors Ignition Switch Litigation

Co-lead counsel in high-profile case on behalf of millions of owners of recalled GM vehicles affected by a safety defect linked to over 100 fatalities. The suit alleges GM did not take appropriate measures, despite having prior knowledge of the defect.

> Lumber Liquidators

Co-lead counsel representing a class of consumers who purchased Lumber Liquidators flooring tainted will toxic levels of formaldehyde.

PRACTICE AREAS Consumer Protection - Drug and Supplement Litigation

Hagens Berman aggressively pursues pharmaceutical industry litigation, fighting against waste, fraud and abuse in healthcare. For decades, pharmaceutical manufacturers have been among the most profitable companies in America. But while pharmaceutical companies become richer, consumers, health plans and insurers pay higher costs for prescription and over-the-counter drugs and supplements. We shine the light of public scrutiny on this industry's practices and represent individuals, direct and indirect purchasers, and the nation's most forward-thinking public-interest groups.

The firm's pharmaceutical and dietary supplement litigation practice is second to none in the nation in terms of expertise, commitment and landmark results. Hagens Berman's attorneys have argued suits against dozens of major drug companies and the firm's aggressive prosecution of pharmaceutical industry litigation has recovered more than \$1 billion in gross settlement funds.

RECENT ANTITRUST RESOLUTIONS

In the last few years, Hagens Berman – as lead or co-lead class counsel – has garnered significant settlements in several antitrust cases involving prescription drugs. In each case, the plaintiffs alleged that a manufacturer of a brand-name drug violated federal or state antitrust laws by delaying generic competitors from coming to market, forcing purchasers to buy the more expensive brand name version instead of the generic equivalent. Examples of our recent successes include:

> Prograf Antitrust Litigation

Hagens Berman represented purchasers who alleged Astellas Pharma US, Inc. unlawfully maintained its monopoly and prevented generic competition for Prograf, an immunosuppressant used to help prevent organ rejection in transplant patients, harming purchasers by forcing them to pay inflated brand name prices for longer than they should have absent the anticompetitive conduct.

RESULT: The parties' motion for final approval of the \$98 million class settlement is under advisement with the court.

> Skelaxin Antitrust Litigation

The firm represented purchasers in this case alleging King Pharmaceuticals LLC and Mutual Pharmaceutical Company alleging conspired to suppress generic competition and preserve King's monopoly in the market for the brand name muscle relaxant Skelaxin.

RESULT: \$73 million class settlement

> Flonase Antitrust Litigation

Hagens Berman represented purchasers in this case alleging pharmaceutical giant GlaxoSmithKline filed petitions to prevent the emergence of generic competitors to its drug Flonase, all to overcharge consumers and purchasers of the drug, which would have been priced lower had a generic competitor been allowed to come to market.

RESULT: \$150 million class settlement

FRAUDULENT DRUG PRICING RESOLUTIONS

Hagens Berman has led many complex cases that take on fraud and inflated drug prices throughout the U.S. This includes sweeping manipulation of the average wholesale price benchmark used to set prices for prescription drugs nationwide, fraudulent marketing of prescription drugs and the rampant use of co-pay subsidy cards that drive up healthcare costs. These efforts have led to several significant settlements:

PRACTICE AREAS Consumer Protection - Drug and Supplement Litigation

> McKesson and First DataBank Drug Litigation

The firm discovered a far-reaching fraud by McKesson and became lead counsel in this RICO case against McKesson and First DataBank, alleging the companies fraudulently inflated prices of more than 400 prescription drugs.

RESULT: \$350 million settlement and a four percent rollback on the prices of 95 percent of the nation's retail branded drugs, the net impact of which could be in the billions of dollars. The states and federal government then used Hagens Berman's work to bring additional suits. Hagens Berman represented several states and obtained settlements three to seven times more than that of the Attorneys General. Almost \$1 billion was recovered from the McKesson fraud.

> Average Wholesale Price Drug Litigation

Hagens Berman served as co-lead counsel and lead trial counsel in this sprawling litigation against most of the nation's largest pharma companies, which alleges defendants artificially inflated Average Wholesale Price.

RESULT: Approximately \$338 million in class settlements. Hagens Berman's work in this area led to many state governments filing suit and hundreds of millions in additional recovery.

FRAUDULENT MARKETING RESOLUTIONS

Hagens Berman also litigates against drug companies that fraudulently promote drugs for uses not approved by the Food and Drug Administration (FDA), commonly known as "off-label" uses. We also litigate cases against dietary supplement manufacturers for making false claims about their products. Recent successes include:

> Neurontin Third Party Payor Litigation

Hagens Berman served as co-lead trial counsel in this case alleging that Pfizer fraudulently and unlawfully promoted the drug Neurontin for uses unapproved by the FDA.

RESULT: A jury returned a \$47 million verdict in favor of a single third-party payor plaintiff, automatically trebled to \$142 million, and the court recently approved a \$325 million class settlement.

> Vioxx Third Party Payor Marketing and Sales Practices Litigation

The firm served as lead counsel for third party payors in the Vioxx MDL, alleging that Merck & Co. misled physicians, consumers and health benefit providers when it touted Vioxx as a superior product to other non-steroidal anti-inflammatory drugs. According to the lawsuit,

the drug had no benefits over less expensive medications, but carried increased risk of causing cardiovascular events. RESULT: \$80 million settlement

> Serono Drug Litigation

Hagens Berman served as lead counsel for a class of consumers and third party payors in a suit alleging that global biotechnology company Serono, Inc. schemed to substantially increase sales of the AIDS drug Serostim by duping patients diagnosed with HIV into believing they suffered from AIDS-wasting and needed the drug to treat that condition.

RESULT: \$24 million settlement

> Bayer Combination Aspirin/Supplement Litigation

Hagens Berman served as lead counsel on behalf of consumers in a suit alleging that Bayer Healthcare LLC deceptively marketed Bayer® Women's Low-Dose Aspirin + Calcium, an 81 mg aspirin pill combined with calcium, and Bayer® Aspirin With Heart Advantage, an 81 mg aspirin pill combined with phytosterols. Plaintiffs alleged that Bayer overcharged consumers for these products or that these products should not have been sold, because these products were not FDA-approved, could not provide all advertised health benefits, and were inappropriate for long-term use.

RESULT: \$15 million settlement

PRACTICE AREAS Employment Litigation

Hagens Berman takes special interest in protecting workers from exploitation or abuse. We take on race and gender discrimination, immigrant worker issues, wage and hour issues, on-the-job injury settlements and other crucial workplace issues.

Often, employees accept labor abuses or a curbing of their rights because they don't know the law, respect their superiors or fear for their jobs. We act on behalf of employees who may lack the individual power to bring about meaningful change in the workplace. We take a comprehensive approach to rooting out systemic employee abuses through in-depth investigation, knowledgeable experts and fervent exploration of prosecution strategies. Hagens Berman is a firm well-versed in taking on complicated employee policies and bringing about significant results. Representative cases include:

> CB Richard Ellis Sexual Harassment Litigation

Filed a class action against CB Richard Ellis, Inc., on behalf of 16,000 current and former female employees who alleged that the company fostered a climate of severe sexual harassment and discriminated against female employees by subjecting them to a hostile, intimidating and offensive work environment, also resulting in emotional distress and other physical and economic injuries to the class.

RESULT: An innovative and unprecedented settlement requiring changes to human resources policies and procedures, as well as the potential for individual awards of up to \$150,000 per class member. The company agreed to increase supervisor accountability, address sexually inappropriate conduct in the workplace, enhance record-keeping practices and conduct annual reviews of settlement compliance by a court appointed monitor.

> Costco Wholesale Corporation Wage & Hour Litigation

Filed a class action against Costco Wholesale Corporation on behalf of 2,000 current and former ancillary department employees, alleging that the company misclassified them as "exempt" executives, denying these employees overtime compensation, meal breaks and other employment benefits. **RESULT:** \$15 million cash settlement on behalf of the class.

> Washington State Ferry Workers Wage Litigation

Represented "on-call" seamen who alleged that they were not paid for being "on call" in violation of federal and state law. **RESULT:** Better working conditions for the employees and rearrangement in work assignments and the "on-call" system.

> SunDance Rehabilitation Corporation

Filed a class action against SunDance challenging illegal wage manipulation, inconsistent contracts and other compensation tricks used to force caregivers to work unpaid overtime. **RESULT:** \$3 million settlement of stock to be distributed out of the company's bankruptcy estate.

Some of the firm's current cases in this area include:

> Swift Transportation

Hagens Berman filed suit against national trucking company Swift Transportation, alleging that it shortchanged its drivers by not paying them on the actual miles traveled when driving. The case is scheduled for trial in October 2015.

> Schneider National Carriers

The firm represents a certified class of regional drivers in a suit filed against Schneider National Carriers, claiming that the company failed to pay its workers for all of their on duty time devoted to a variety of work tasks, including vehicle inspections, fueling, and waiting on customers and assignments. The suit also claims that the company does not provide proper meal and rest breaks and the company is liable for substantial penalties under the California Labor Code.

Governmental Representation

Hagens Berman has been selected by public officials to represent government agencies and bring civil law enforcement and damage recoupment actions designed to protect citizens and the treasury. We understand the needs of elected officials and the obligation to impartially and zealously represent the interests of the public, are often chosen after competitive bidding and have been hired by officials from across the political spectrum.

Hagens Berman has assisted governments in recovering billions of dollars in damages and penalties from corporate wrongdoers and, in the process, helped reform how some industries do business. In serving government, we are often able to leverage the firm's expertise and success in related private class-action litigation. Successes on behalf of government clients include:

> Big Tobacco

We represented 13 states in landmark Medicaid-recoupment litigation against the country's major tobacco companies. Only two states took cases to trial – Washington and Minnesota. The firm served as trial counsel for the state of Washington, becoming only one of two private firms in the entire country to take a state case to trial.

Hagens Berman was instrumental in developing what came to be accepted as the predominant legal tactic to use against the tobacco industry: emphasizing traditional law enforcement claims such as state consumer protection, antitrust and racketeering laws. This approach proved to be nearly universally successful at the pleading stage, leaving the industry vulnerable to a profitsdisgorgement remedy, penalties and double damages. The firm also focused state legal claims on the industry's deplorable practice of luring children to tobacco use.

RESULT: \$206 billion for state programs, the largest settlement in the history of civil litigation in the U.S.

> McKesson Average Wholesale Price Litigation

This litigation is yet another example of fraudulent drug price inflation impacting not just consumers and private health plans, but public health programs such as Medicaid and local government-sponsored plans as well.

RESULT: Hagens Berman has started the AWP class action, which resulted in many states filing cases. HB represented several of those states in successful litigation.

> McKesson Government Litigation

On the heels of Hagens Berman's class action against McKesson, the firm led lawsuits by states (Connecticut, Utah, Virginia, Montana, Arizona).

RESULT: These states obtained recoveries three to seven times larger than states settling in the multi-state Attorneys General settlement. In addition, the firm obtained \$12.5 million for the City of San Francisco and \$82 million for a nationwide class of public payors.

> Zyprexa Marketing & Sales Practices Litigation - Connecticut

Hagens Berman served as outside counsel to then-Attorney General Richard Blumenthal in litigation alleging that Lilly engaged in unlawful offlabel promotion of the atypical antipsychotic Zyprexa. The litigation also alleged that Lilly made significant misrepresentations about Zyprexa's safety and efficacy, resulting in millions of dollars in excess pharmaceutical costs borne by the State and its taxpayers. **RESULT:** \$25 million settlement.

PRACTICE AREAS Intellectual Property

The Hagens Berman intellectual property team has deep experience in all aspects of intellectual property litigation. We specialize in complex and significant damages cases against some of the world's largest corporations.

The firm is primarily engaged in patent infringement litigation at this time. We seek to represent intellectual property owners, including inventors, universities, non-practicing entities, and other groups whose patent portfolios represents a significant creative and capital investment.

Our current and recent engagements include the following:

> Bombadier Inc.

The firm represented Arctic Cat Inc. in patent infringement litigation against Bombardier Recreational Products and BRP U.S. Inc. The complaint alleges that Bombardier's Sea-Doo personal watercraft infringe Arctic Cat's patents covering temporary steerable thrust technology used when the rider turns in offthrottle situations.

Florida U.S. District Judge Beth Bloom issued a final judgment of \$46.7 million against defendants, trebling initial damages of \$15.5 million awarded in a unanimous jury verdict.

> Oracle

The firm represents Thought Inc. against Oracle Corporation in a suit alleging infringement of seven patents covering various aspects of middleware systems providing application to database mapping, reading and persistence.

> Salesforce

The firm represents Applications in Internet Time LLC in patent litigation against Salesforce Inc. The suit alleges that our client's patents cover the core architecture of salesforce's platform for developing, customizing, and updating cloud-based software applications.

> Nintendo

The firm represented Japan-based Shinsedai Company in patent infringement litigation against Nintendo. The suit alleged that our client's patents were infringed by various sports games for the Nintendo Wii.

> Electronic Arts

The firm represents the original software developer of the Electronic Arts (EA) NFL Madden Football video game series in a suit alleging that he is owed royalties on EA Madden NFL titles as well as other derivative products. We prevailed in two trials against EA, and the verdicts were designated as the Top Verdict of the Year (2013) by The Daily Journal. The judgment is on appeal and if upheld will return for a final damages phase.

> Samsung, LG, Apple

The firm represents FlatWorld Interactives LLC in patent litigation against Samsung, LG and Apple. The complaints allege that the defendants' mobile handsets, tablets, media players and other

Unlike other intellectual property firms, Hagens Berman only represents plaintiffs. This reduces the risk of potential conflicts of interest which often create delays in deciding whether or not to take a case at larger firms.

PRACTICE AREAS Intellectual Property

devices infringe a FlatWorld patent covering the use of certain gestures to control touchscreen displays.

> Alnylam, MIT, Max Planck Institute

The firm represents the University of Utah against Alnylam Pharmaceuticals Inc., Massachusetts Institute of Technology and Max Planck Institute in a suit seeking to correct inventorship on patents covering discoveries in gene therapy involving silencing of target gene expression in cells through RNA interference. Hagens Berman defeated a motion to dismiss the case at the district court, won again on appeal to the Federal Circuit and defeated defendants' petition for certiorari by the Supreme Court. The case is set for trial in 2015.

> Alcon

The firm represents Femto-Sec Tech Inc. and its founder Joseph Neev in patent and breach of contract litigation against Alcon Laboratories and certain Alcon subsidiaries. The patents cover foundational applications of lasers in the fields of ophthalmic surgery and dermatology.

Hagens Berman is also skilled in other aspects of intellectual property law, including trademark, trade dress, trade secret and copyright litigation.

PRACTICE AREAS Investor Fraud - Individual and Class Action Litigation

Investing is a speculative business involving assessment of a variety of risks that can only be properly weighed with full disclosure of accurate information. No investor should suffer undue risk or incur losses due to misrepresentations related to their investment decisions.

Our attorneys work for institutional and individual investors defrauded by unscrupulous corporate insiders and mutual funds. The firm vigorously pursues fraud recovery litigation, forcing corporations and mutual funds to answer to deceived investors.

Hagens Berman is one of the country's leading securities litigation firms advising clients in both individual and class-action cases. The firm has experience, dedication and a team with the horsepower required to drive complex cases to exemplary outcomes. Our attorneys are authorities in an array of issues unique to federal and state securities statutes and related laws. We use a variety of highly experienced experts as an integral part of our prosecution team. Successes on behalf of our investor clients include:

> Charles Schwab Securities Litigation

Lead counsel, alleging fraud in the management of the Schwab YieldPlus mutual fund.

RESULT: \$235 million class settlement for investors.

> Oppenheimer

Additional counsel for lead plaintiffs in class action alleging Oppenheimer misled investors regarding its Champion and Core Bond Funds.

RESULT: \$100 million for the classes.

> Tremont

Co-lead counsel in a case alleging Tremont Group Holdings breached its fiduciary duties by turning over \$3.1 billion to Bernard Maddoff. On Sept. 14, 2015, after nearly two years of negotiations and mediation, the court granted final approval of the plan of allocation and fistribution of the funds which markets estimate could yield inbvestors as much as \$1.45 billion. RESULT: \$100 million settlement between investors, Tremont and its affiliates.

> Enron

Co-lead counsel in ERISA litigation. **RESULT:** More than \$250 million, the largest ERISA settlement in history.

Boeing

Uncovered critical production problems with the 777 airliner documented internally by Boeing, but swept under the rug until a pending merger with McDonnell Douglas was completed. **RESULT:** Record-breaking settlement of more than \$92.5 million.

> J.P. Morgan – Madoff

Case alleges that banking and investment giant J.P. Morgan was complicit in aiding Bernard Madoff's Ponzi scheme. Investors claim that J.P. Morgan operated as Bernard L. Madoff Investment Securities LLC's primary banker for more than 20 years. **RESULT:** \$218 million settlement amount for the class and a total of \$2.2 billion paid from JPMorgan that will benefit victums of Madoff's Ponzi scheme.

PRACTICE AREAS Investor Fraud - Individual and Class Action Litigation

> Morrison Knudsen

Filed a shareholder class action, alleging that MK's senior officers concealed hundreds of millions in losses. **RESULT:** More than \$63 million for investors.

> Raytheon/Washington Group

Charged Raytheon with deliberately misrepresenting the true financial condition of Raytheon Engineers & Constructors division in order to sell this division to the Washington Group at an artificially inflated price.

RESULT: \$39 million settlement.

> U.S. West

Represented shareholders of U.S. West New Vector in a challenge to the proposed buyout of minority shareholders by U.S. West.

RESULT: The proposed buyout was stayed, and a settlement was achieved, resulting in a \$63 million increase in the price of the buyout.

Our current casework includes:

> China MediaExpress

Hagens Berman represents investors in a case against China MediaExpress, which purported to be the owner of a network of advertising terminals on buses throughout China. The case alleges that the company and its auditor (Deloitte Touche Tohmatsu) participated in accounting fraud that ultimately led to the demise of the company. In early 2014, the court entered a default judgment in the amount of \$535 million and certified a proposed class against China Media Express Holdings Inc. The case will proceed separately against Deloitte Touche Tohmatsu.

On May 6, 2015 Hagens Berman obtained a \$12 million settlement from Deloitte Touche Tohmatsu, one of the largest settlements against an auditor in a Chinese "reverse merger" case which is now awaiting final approval from the court.

> Altisource Asset Management Corporation

The firm was appointed lead counsel in this institutional investor lawsuit brought on behalf of purchasers of Altisource Asset Management Corporation (AAMC). The complaint alleges that AAMC misrepresented or outright concealed its relationship with these companies and the extent to which the interconnected entities engaged in conflicted transactions with themselves. Estimates of class-wide damages are in the hundreds of millions of dollars. The firm recently filed the consolidated complaint and motions to dismiss are pending before the U.S. District Court for the District of the Virgin Islands.

WHISTLEBLOWERS

In an effort to curb Wall Street excesses, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act, which built vigorous whistleblower protections into the legislation known as the "Wall Street Tip-Off Law."

The law empowers the U.S. Securities and Exchange Commission to award between 10 and 30 percent of any monetary sanctions recovered in excess of \$1 million to whistleblowers who provide information leading to a successful SEC enforcement. It also provides similar rewards for whistleblowers reporting fraud in the commodities markets.

Hagens Berman represents whistleblowers with claims involving violations of the Securities Exchange Act and the Commodities Exchange Act.

Unlike traditional whistleblower firms who have pivoted into this area, Hagens Berman has a strong background and history of success in securities, antitrust and other areas of fraud enforcement, making us an ideal partner for these cases. Our matters before the SEC/CFTC include a range of claims, including market manipulation and fraudulent financial statements.

PRACTICE AREAS Investor Fraud - Institutional Investor Portfolio Monitoring and Recovery Services

Hagens Berman is a leading provider of specialized securities litigation services to public, private and Taft-Hartley pension funds. We offer proprietary and unparalleled asset protection and recovery services to both foreign and domestic institutions. Our institutional services provide participants with the ability to identify, investigate and react to potential wrongdoing by companies in which the institution invests.

PORTFOLIO MONITORING. Timely information and analysis are the critical ingredients of a successful fraud recovery program. Institutions must receive quick, reliable determinations concerning the source and extent of their losses, the likelihood of recoupment and the best manner for pursuing it. Our Portfolio Monitoring Service provides these services at no cost to participating institutions. The Hagens Berman Portfolio Monitoring Service has three primary components:

TRACKING. Alerts clients of any significant portfolio losses due to suspected fraud.

ANALYSIS. Provide clients with necessary legal and factual analyses regarding possible recovery options, removing from the institution any burden connected with scrutinizing myriad instances of potential wrongdoing and attempt to decipher whether direct, recoverable injuries have resulted.

REPORTING. Attorneys and forensic accounting fraud experts deliver a concise monthly report that furnishes comprehensive answers to these inquiries. On a case-by-case basis, the report specifies each of the securities in which the client lost a significant amount of money, and matches those securities with an analysis of potential fraud likelihood, litigation options and an expert recommendation on how best to proceed for maximum recovery.

Our Portfolio Monitoring Service performs its functions with almost no inconvenience to participating institutions. A client's custodian bank provides us with records detailing the client's transactions from the prior several years and on a regular basis thereafter. Importantly, none of the institution's own personnel is required to share in this task, as we acquire the information directly from the custodian bank.

We provide our Portfolio Monitoring service with no strings attached and allow our clients to act without cost or commitment. In instances where a litigation opportunity arises, we believe our skills make us the ideal choice for such a role, although the client is free to choose others.

When a portfolio loses money because of corporate deception, our litigation services seek to recover a substantial percentage of those losses, thereby increasing a fund's performance metric. As fiduciaries, money managers may not have the ability or desire to risk funds on uncertain litigation using typical hourly-rate law firms. Hagens Berman seeks to minimize the burden on the money manager by pursuing cases on a contingent-fee basis.

Practice areas Personal Injury and Abuse

For more than a decade, Hagens Berman's blend of professional expertise and commitment to our clients has made our firm one of the most well-respected and successful mass tort and personal injury law firms in the nation. We deliver exceptional results for our clients by obtaining impressive verdicts and settlements in personal injury litigation.

Our attorneys have experience in wrongful death, brain injury and other catastrophic injury cases, as well as deep experience in social work negligence, medical malpractice, nursing home negligence and sexual abuse cases.

Hagens Berman also has unparalleled experience in very specific areas of abuse law, recovering damages on behalf of some of the most vulnerable people in our society.

Sexual Abuse Litigation Hagens Berman has represented a wide spectrum of individuals who have been victims of sexual abuse, including children and developmentally disabled adults. We treat each case individually, with compassion and attention to detail and have the expertise, resources and track record to stand up to the toughest opponents. In the area of sexual abuse, our attorneys have obtained record-breaking verdicts, including the largest personal injury verdict ever upheld by an appellate court in the state of Washington.

Nursing Home Negligence Nursing home negligence is a growing problem throughout the nation. As our population ages, reports of elder abuse and nursing home negligence continue to rise. Today, elder abuse is one of the most rapidly escalating social problems in our society. Hagens Berman is uniquely qualified to represent victims of elder abuse and nursing home negligence. Our attorneys have secured outstanding settlements in this area of the law and have committed to holding nursing homes accountable for wrongdoing.

Social Work Negligence Social workers play a critical role in the daily lives of our nation's most vulnerable citizens. Social workers, assigned to protect children, the developmentally disabled and

elderly adults, are responsible for critical aspects of the lives of tens of thousands of citizens who are unable to protect themselves. Many social workers do a fine job. Tragically, many do not. The results are often catastrophic when a social worker fails to monitor and protect his or her vulnerable client. All too often, the failure to protect a child or disabled citizen leads to injury or sexual victimization by predators. With more than \$40 million in recoveries on behalf of vulnerable citizens who were neglected by social workers, Hagens Berman is the most experienced, successful and knowledgeable group of attorneys in this dynamic area of the law.

Workplace Injury While many workplace injury claims are precluded by workers compensation laws, many instances of workplace injury are caused by the negligence and dangerous oversight of third parties. In these instances, victims may have valid claims. Hagens Berman's personal injury legal team has successfully brought many workplace injury claims, holding third parties liable for our clients' serious bodily injuries.

Medical Malpractice Litigating a medical malpractice case takes acute specialization and knowledge of medical treatments and medicine. Notwithstanding these facts, Hagens Berman pursues meritorious medical malpractice claims in instances where clients have suffered life-altering personal injuries. Our firm's personal injury attorneys handle medical malpractice cases with the dedication and detail necessary to make victims whole. Hagens Berman is very selective in accepting medical malpractice cases and has been successful in recovering significant compensation for victims of medical error and negligence.

PRACTICE AREAS Sports Litigation

Hagens Berman has one of the nation's most highly regarded sports law practices. Our attorneys are the vanguard of new and innovative legal approaches to protect the rights of professional and amateur athletes in cases against large, well-financed interests, including the National Collegiate Athletic Association (NCAA), the National Football League (NFL) and the Fédération Internationale de Football Association (FIFA).

> NCAA: Scholarships/Grants In Aid (GIAs)

Cases of particular nationwide interest for fans, athletes and the general public involve numerous cases filed by Hagens Berman against the NCAA. The most recent, and potentially far-reaching, case involves a suit on behalf of NCAA student-athletes against the NCAA and its most powerful members, including the Pac-12, Big Ten, Big-12, SEC and ACC, claiming these entities violated federal antitrust laws by drastically reducing the number of scholarships and financial aid student-athletes receive to an amount below the actual cost of attendance and far below what the free market would bare.

> NCAA: Concussions

Hagens Berman has also taken on the NCAA for its failure to prevent concussions and protect student-athletes who suffered concussions. Currently, the firm is finalizing a proposed settlement that will make sweeping changes to the NCAA's approach to concussion treatment and prevention; provide a 50year medical-monitoring program for student-athletes to screen for and track head injuries; and establish a \$5 million fund for concussion research.

The core settlement benefits include:

A 50-year medical monitoring program overseen by a medical science committee appointed by the court that will screen and track concussions. Examinations will include neurological and neurocognitive assessments to evaluate potential injuries. The monitoring program will be funded by a \$70 million medical monitoring fund, paid by the NCAA and its insurers.

Significant changes to and enforcement of the NCAA's concussion management policies and return-to-play guidelines. All players will now receive a seasonal, baseline test to better assess concussions sustained during the season. All athletes who have sustained a concussion will now need to be cleared before returning to play, under the terms of the settlement. Additionally, a medical professional trained in the diagnosis of concussions will be present at all games involving contact-sports. The settlement also creates reporting mandates for concussions and their treatment.

> Player Likeness Rights

Hagens Berman attorneys representing student-athletes who claimed that the NCAA illegally used student-athletes' names, images and likenesses in Electronic Arts' popular NCAA Football, Basketball and March Madness video game series reached a combined \$60 million settlement with the NCAA and EA, marking the first time the NCAA has agreed to a settlement that pays student-athletes for acts related to their participation in athletics

The firm also represents NFL legend Jim Brown in litigation against videogame manufacturer Electronic Arts for improperly using his likeness in its NFL video games.

"We began this case with the knowledge that the NCAA and member schools were resolute in keeping as much control over student-athletes as possible," managing partner Steve Berman said. "But we were equally resolute that anyone – even a student-athlete playing under scholarship – should not be exploited for profit, especially by the organization that vowed to prevent the athlete from exploitation."

PRACTICE AREAS Sports Litigation

> USA Water Polo: Concussions

Hagens Berman filed a class-action suit against USA Water Polo alleging the entity has neglected to enact concussion and head injury safety measures. The case arises from USA Water Polo's failure to take steps to recognize, manage and appropriately treat head injuries and concussions. The governing body for the sport allegedly failed to implement even a scant amount of concussion management care for its participants, representing an extreme departure from the ordinary standard of care.

> FIFA/U.S. Soccer: Concussions

Several current and former soccer players filed a class action against U.S. soccer's governing bodies, which led to sweeping safety measures brought to millions of US youth soccer players. Players represented by Hagens Berman alleged these groups failed to adopt effective policies to evaluate and manage concussions.

The settlement suit against six of the largest youth soccer organizations eliminated heading for youth players and greatly diminishing risks of concussions and traumatic head injuries, and also set other benchmarks for concussion measurement and safety protocols.

> NFL Films: Player Likeness

Together with attorney and former NFL player, Bob Stein, Hagens Berman represents a group of accomplished retired NFL players who challenge the uncompensated use of the players' images by NFL Films. The firm originally filed suit on behalf of ten players in Culp v. NFL Films, but that suit was dismissed due to an injunction instituted while a previous settlement was finalized. However, U.S. District Judge Paul Magnuson lifted the injunction that would have barred further litigation for several years. This opened the doors for immediate further legal action by more than 2,000 retired players, including numerous NFL Hall-of-Famers.

> Pop Warner

Hagens Berman represents youth athletes who have suffered traumatic brain injuries due to gross negligence, and has filed a

lawsuit on behalf of former Pop Warner football player Donnovan Hill and his mother Crystal Dixon. The suit claims that the league insisted Hill use improper and dangerous tackling techniques which left the now 17-year-old paralyzed from the neck down. Pop Warner, its affiliates, Hill's coaches and members of the Lakewood Pop Warner board of directors are liable for the coaches' repeated and incorrect instruction that Hill and his teammates tackle opposing players by leading with the head.

Hagens Berman encourages Pop Warner and high school student-athletes and/or parents or guardians to contact the firm if they believe a student-athlete has suffered a brain injury due to harm sustained during Pop Warner or high school sports.

> MLB Foul Ball Injuries

Hagens Berman filed a class-action lawsuit on behalf of baseball fans, seeking to extend safety netting to all major and minor league ballparks from foul pole to foul pole. The suit alleges that tens of millions attend an MLB game annually, and every year fans of all ages, but often children, suffer horrific and preventable injuries, such as blindness, skull fractures, severe concussions and brain hemorrhages when struck by a fast-moving ball or flying shrapnel from a shattered bat.

> Other Cases

In addition to its class actions, Hagens Berman has filed several individual cases to uphold the rights of athletes and ensure a fair and safe environment. The firm has filed multiple individual cases to address concussions and other traumatic head injuries among student-athletes at NCAA schools and in youth sports. Hagens Berman continues to represent the interests of athletes and find innovative and effective applications of the law to uphold players' rights.

The firm has also brought many concussions cases on behalf of individual athletes, challenging large universities and institutions for the rights those who have suffered irreversible damage due to gross negligence and lack of even the most basic concussionmanagement guidelines.

PRACTICE AREAS Whistleblower Litigation

Hagens Berman represents whistleblowers under various programs at both the state and federal levels. All of these whistleblower programs reward private citizens who blow the whistle on fraud. In many cases, whistleblowers report fraud committed against the government and may sue those individuals or companies responsible, helping the government recover losses.

Our depth and reach as a leading national plaintiffs' firm with significant success in varied litigation against industry leaders in finance, health care, consumer products, and other fields causes many whistleblowers to seek us to represent them in claims alleging fraud against the government.

Our firm also has several former prosecutors and other government attorneys in its ranks and has a long history of working with governments, including close working relationships with attorneys at the U.S. Department of Justice. The whistleblower programs under which Hagens Berman pursues cases include:

FALSE CLAIMS ACT

Under the federal False Claims Act, and more than 30 similar state laws, a whistleblower reports fraud committed against the government, and under the law's *Qui Tam* provision, may file suit on its behalf to recover lost funds. False claims acts are one of the most effective tools in fighting Medicare and Medicaid fraud, defense contractor fraud, financial fraud, under-payment of royalties, fraud in general services contracts and other types of fraud perpetrated against governments.

The whistleblower initially files the case under seal, giving it only to the government and not to the defendant, which permits the government to investigate. After the investigation, the government may take over the whistleblower's suit, or it may decline. If the government declines, the whistleblower can proceed alone on his or her behalf. In successful suits, the whistleblower normally receives between 15 and 30 percent of the government's recovery as a reward. Since 1986, federal and state false claims act recoveries have totaled more than \$22 billion. Some examples of our cases brought under the False Claims Act include:

> In U.S. ex rel. Lagow v. Bank of America

Represented former District Manager at Landsafe, Countrywide Financial's mortgage appraisal arm, who alleged systematic abuse of appraisal guidelines as a means of inflating mortgage values.

RESULT: The case was successful, ultimately triggering a settlement of \$1 billion, and our client received a substantial reward.

> In U.S. ex rel. Mackler v. Bank of America

Represented a whistleblower who alleged that Bank of America failed to satisfy material conditions of its government contract to provide homeowners mortgage relief under the HAMP program. **RESULT:** The case succeeded and was settled as part of the 2012 global mortgage settlement, resulting in an award to our client.

> In U.S. ex rel. Horwitz v. Amgen

Represented Dr. Marshall S. Horwitz, who played a key role in uncovering an illegal scheme to manipulate the scientific record regarding two of Amgen's blockbuster drugs.

RESULT: \$762 million in criminal and civil penalties levied by the U.S. Department of Justice and an award to our client.

PRACTICE AREAS Whistleblower Litigation

SECURITIES AND EXCHANGE COMMISSION / COMMODITY FUTURES TRADING COMMISSION

Since implementation of the SEC/CFTC Dodd Frank whistleblower programs in 2011, Hagens Berman has naturally transitioned into representation of whistleblowers with claims involving violations of the Securities Exchange Act and the Commodities Exchange Act.

Unlike the False Claims Act, whistleblowers with these new programs do not initially file a sealed lawsuit. Instead, they provide information directly to the SEC or the CFTC regarding violations of the federal securities or commodities laws. If the whistleblower's information leads to an enforcement action, they may be entitled to between 10 and 30 percent of the recovery.

The firm currently represents HFT whistleblower and market expert, Haim Bodek, in an SEC fraud whistleblower case that prompted the U.S. Securities and Exchange Commission to bring record-breaking fines against two exchanges formerly owned by Direct Edge Holdings (and since acquired by Bats Global Markets, the second-largest financial exchange in the country). The exchanges agreed to pay \$14 million to settle charges that the exchanges failed to accurately and completely disclose how order types functioned on its exchanges and for selectively providing such information only to certain high-frequency trading firms.

Hagens Berman also represents an anonymous whistleblower who brought his concerns and original analysis related to the May 2, 2010 Flash Crash to the CFTC after hundreds of hours spent analyzing data and other information. Both the U.S. Commodity Futures Trading Commission (CFTC) and the Department of Justice, in separate criminal and civil enforcement actions, brought charges of market manipulation and spoofing against Nav Sarao Futures Limited PLC (Sarao Futures) and Navinder Singh Sarao (Sarao) based on the whistleblower's information.

Hagens Berman has worked alongside government officials and regulators, establishing the credibility necessary to bring a case to the SEC or CFTC. When Hagens Berman brings a claim, we work hard to earn their respect and regulators pay attention.

INTERNAL REVENUE SERVICE

Hagens Berman also represents whistleblowers under the IRS whistleblower program enacted with the Tax Relief and Health Care Act of 2006.

The IRS program offers rewards to those who come forward with information about persons, corporations or any other entity that cheats on its taxes. In the event of a successful recovery of government funds, a whistleblower can be rewarded with up to 30 percent of the overall amount collected in taxes, penalties and legal fees.

Hagens Berman helps IRS whistleblowers present specific, credible tax fraud information to the IRS. Unlike some traditional False Claims Act firms, Hagens Berman has experience representing governments facing lost tax revenue due to fraud, making us wellpositioned to prosecute these cases.

Legal Team



CONTACT

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YEARS OF EXPERIENCE

/ 30

PRACTICE AREAS

- > Antitrust/Trade Law
- > Consumer Protection
- > Securities/Investment Fraud
- > Whistleblower/Qui Tam
- > Patent Litigation

BAR ADMISSIONS

- > Washington
- > Illinois

EDUCATION

- > University of Chicago Law School, J.D., 1980
- > University of Michigan, B.A., 1976

managing partner Steve W. Berman

Served as lead counsel for the largest settlement in world history against Big Tobacco, and at the time the largest automotive, antitrust, ERISA and securities settlements in U.S. history.

Steve Berman represents consumers, investors and employees in large, complex litigation held in state and federal courts. Berman's trial experience has earned him significant recognition and led The National Law Journal to name him one of the 100 most powerful lawyers in the nation, and to repeatedly name Hagens Berman one of the top 10 plaintiffs' firms in the country. He has been named a 2016 MVP of the Year by Law360 for his class-action litigation, and was also recognized for the third year in a row as an Elite Trial Lawyer by the National Law Journal.

Steve co-founded Hagens Berman in 1993 after his prior firm refused to represent several young children who consumed fast food contaminated with E. coli—Steve knew he had to help. In that case, Steve proved that the poisoning was the result of Jack in the Box's cost cutting measures along with gross negligence. He was further inspired to build a firm that vociferously fought for the rights of those unable to fight for themselves. Berman's innovative approach, tenacious conviction and impeccable track record have earned him an excellent reputation and numerous historic legal victories. He is considered one of the nation's most successful class-action attorneys, and has been praised for securing record-breaking settlements and tangible benefits for class members. Steve is particularly known for his tenacity in pioneering consumer settlements that return a high percentage of recovery to class members.

CURRENT ROLE

> Managing Partner, Hagens Berman Sobol Shapiro LLP

RECENT SUCCESS

> Automotive Litigation

- Appointed co-lead counsel in the massive MDL alleging that Toyota vehicles contained a defect causing sudden, unintended acceleration – In re: Toyota Motor Corp. Unintended Acceleration MDL.
 Berman was selected by Judge Selna without having applied for the leadership position for his expertise in complex, sprawling class-action litigation. The case culminated in the largest automotive settlement in history that Judge Selna called, "extraordinary because every single dollar in the cash fund will go to claimants." In addition, the settlement resulted in a brake override being installed on millions of vehicles. Since then, the incidents of unintended acceleration have virtually disappeared. (\$1.6 billion settlement)
- Co-lead counsel in the high-profile ignition-switch litigation against GM, representing millions of vehicle owners who have suffered loss of vehicle value due to GM's concealment of safety defects.
- Member of the Plaintiffs' Steering Committee in the VW consumer litigation and part of the Settlement Negotiating team. In June 2016, VW agreed to \$14.7 billion settlement for more than 475,000 2.0-liter diesel vehicles including \$10 billion that will be used to compensate owners. In February 2017, the Court grated preliminary approval of a \$1 billion settlement for the more than 80,000 3.0-liter diesel

MANAGING PARTNER Steve W. Berman

vehicles. VW has agreed to buy back 20,000 of those cars. VW hopes to offer a fix for the remaining 60,000, although the fix is still pending the approval of the EPA and CARB. (\$14.7 billion & \$1 billion settlements)

- Lead counsel for VW franchise dealers suit, in which a settlement of \$1.6 billion has received final approval, and represents a result of nearly full damages for the class. (\$1.6 billion settlement)
 Steve has pioneered pursuing car manufacturers who have been violating emissions standards, including: Mercedes BlueTec vehicles, GM Chevy Cruze, Dodge Ram 2500, Dodge Ram 1500 and Jeep Cherokee. Steve and the firm's work in emissions-cheating investigations is ahead of the EPA and government regulators.
- Steve has pioneered pursuing car manufacturers who have been violating emissions standards, including: Mercedes BlueTec vehicles, GM Chevy Cruze, Dodge Ram 2500, Dodge Ram 1500 and Jeep Cherokee. Steve and the firm's work in emissions-cheating investigations is ahead of the EPA and government regulators.
- Led the firm's aggressive fight against Hyundai and Kia on behalf of defrauded consumers who alleged the automakers had misrepresented fuel economies in vehicles, securing what was believed to then be the second-largest automotive settlement in history. (\$255 million settlement)

> Sports Litigation

- Pioneered a sweeping concussion settlement with U.S. Soccer, bringing safety measures to millions
 of youth soccer players, and ending heading for U.S. Soccer's youngest and most affected players,
 diminishing the risk of traumatic brain injuries.
- Represented current and former student-athletes against the NCAA and Electronic Arts concerning illegal use of college football and basketball players' names and likenesses in video games without permission or consent from the players. (\$60 million settlement)
- Led the firm's pioneering NCAA concussions suit that culminated in a proposed settlement that will provide a 50-year medical-monitoring program for student-athletes to screen for and track head injuries; make sweeping changes to the NCAA's approach to concussion treatment and prevention; and establish a \$5 million fund for concussion research, preliminarily approved by the court.
- Co-lead counsel in the *Alston* case that challenges the NCAA's limitations on the benefits studentathletes can receive as part of a scholarship. A proposed settlement of \$208 million is pending preliminary approval. The recovery would be 100 percent of single damages in an exceptional result in an antitrust case.

> Wall Street

- Class-action securities case against Charles Schwab (\$235 million settlement)
- Represented Bernard L. Madoff investors in a suit filed against JPMorgan Chase Bank, one of the largest banks in the world (approved \$218 million settlement)
- Represented a class of tens of thousands of shareholders against Boeing, culminating in a proposed settlement that was the second-largest awarded in the Northwest. (\$92.5 million settlement)

> Antitrust

- Fought against Apple and five of the nation's top publishers for colluding to raise the price of e-books, resulting in recovery equal to twice consumers' actual damages. (\$560 million settlement)
- Represents a class of indirect purchasers against manufacturers of optical disc drives (ODDs) that allegedly colluded to stabilize the prices of ODDs worldwide. In February 2016, Judge Seeborg granted class certification.

MANAGING PARTNER Steve W. Berman

 Served as co-lead counsel in what was then the largest antitrust settlement in history: a class-action lawsuit alleging that Visa and MasterCard, together with Bank of America, JP Morgan Chase and Wells Fargo, violated federal antitrust laws by establishing uniform agreements with U.S. banks, preventing ATM operators from setting ATM access fees below the level of the fees charged on Visa's and MasterCard's networks. The case resulted in a \$27 billion settlement.

RECOGNITION

- > Awarded 2016 MVP of the Year in Class Action by Law360
- > Steve Berman named a member of the 2014-2015 Lawdragon 500 Leading Lawyers in America
- > Voted one of the 100 most influential attorneys in America by The National Law Journal three times
- > Voted most powerful lawyer in the state of Washington by The National Law Journal
- > Hagens Berman named one of the top 10 plaintiffs' firms in the country, The National Law Journal
- > Selected as a Finalist for Public Justice's 2014 Trial Lawyer of the Year

NOTABLE CASES

State Tobacco Litigation - \$206 billion settlement

Lead counsel for 13 states in cases that led to the largest settlement in world history.

> Visa/MasterCard Antitrust Litigation - \$27 billion settlement

The firm served as co-lead counsel in what was then the largest antitrust settlement in history.

> WPPSS Securities Litigation

Member of trial team that led to the then largest securities case settlement.

> McKesson Drug Litigation - \$350 million settlement

Lead counsel in an action that led to a rollback of benchmark prices of hundreds of brand name drugs, and a \$350 million settlement for third-party payers and insurers.

> Average Wholesale Price Litigation - \$338 million settlement

Steve served as lead trial counsel, securing trial verdicts against three drug companies that paved the way for a settlement of \$338 million.

> DRAM Memory Antitrust - \$345 million settlement

Forged a class-action suit against leading DRAM (Dynamic Random Access Memory) manufacturers, claiming the companies secretly agreed to reduce the supply of DRAM in order to artificially raise prices.

> Enron Pension Protection Litigation - \$250 million settlement

Lead counsel for Enron employees whose retirement accounts were wiped out by Enron's fraud. Settlement was the largest ERISA settlement in U.S. history.

> Charles Schwab Securities Litigation - \$235 million settlement

Lead counsel in securities case resulting in settlement and 45 percent and 82 percent recoveries for the class, high percentages for securities cases.

> Boeing Securities Litigation - \$92 million settlement Berman served as lead counsel in a settlement of a securities action concerning Boeing's merger with McDonnell Douglas.

MANAGING PARTNER Steve W. Berman

> Bextra/Celebrex Marketing and Products Liability Litigation - \$89 million settlement Served as court-appointed member of the Plaintiffs Steering Committee and represented nationwide consumers and third party payers who paid for Celebrex and Bextra. The firm was praised by the court for its "unstinting" efforts on behalf of the class.

> McKesson Governmental Entity Litigation - \$82 million settlement

Steve was lead counsel for a nationwide class of local governments that resulted in an \$82 million settlement for drug price-fixing claims.

> VW Emissions Litigation

Steve is currently serving as a member of the Plaintiffs Steering Committee representing owners of Volkswagen CleanDiesel vehicles that were installed with emissions-cheating software.

> VW Franchise Dealers Litigation - \$1.6 billion settlement

Steve is currently serving as a member of the Plaintiffs Steering Committee representing owners of Volkswagen CleanDiesel vehicles that were installed with emissions-cheating software.

> Mercedes Emissions Litigation

Judge Jose L. Linares appointed the firm as interim class counsel in the case against Mercedes concerning emissions of its BlueTEC diesel vehicles.

> Lumber Liquidators Flooring

Steve is court-appointed co-lead counsel in ongoing litigation against Lumber Liquidators representing consumers who unknowingly purchased flooring tainted with toxic levels of cancer-causing formaldehyde.

> Optical-Disc Price Fixing Litigation

Lead counsel in action on behalf of consumers in more than two dozen states against the manufacturers of optical disk drives. The plaintiffs allege defendants conspired to increase the price of ODDs that were sold to original equipment manufacturers. Defendants' conduct allegedly caused millions of consumer electronics products, such as computers, to be sold at illegally inflated prices.

> NCAA Concussions

Steve is lead counsel in a class action seeking to protect NCAA student-athletes in all sports.

> NCAA Grant-In-Aid Litigation

Steve is lead counsel in a case challenging the NCAA's collusion in refusing to allow student athletes to receive scholarships amounting to the full cost of attending school.

> Stericycle Overpricing Litigation

Steve is heading the firm's position as lead counsel in this class-action lawsuit on behalf of Stericycle customers for an overpricing scheme.

> Orange County and Santa Clara County Opioid Litigation

Opioid abuse is one of our nation's leading health disasters. Steve is leading the first litigation seeking to recover public costs resulting from the opioid manufacturer's deceptive marketing.

> Exxon Mobile Oil Spill

Represented clients against Exxon Mobil affected by the 10 million gallons of oil spilled off the coast of Alaska by the Exxon Valdez (multi-million dollar award)

MANAGING PARTNER Steve W. Berman

> General Motors Ignition Switch Defect Litigation

Steve serves as lead counsel seeking to obtain compensation from the millions of GM car owners whose cars have diminished in value.

PERSONAL INSIGHT

Steve was a high school and college soccer player and coach. Now that his daughter's soccer skills exceed his, he is relegated to being a certified soccer referee and spends weekends being yelled at by parents and coaches. Steve is also an avid cyclist and is heavily involved in working with young riders on the USA cycling team and who are trying to transition to the pro cycling tour.



CONTACT

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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Pharmaceutical Fraud
- Consumer Protection
- > Antitrust Litigation

BAR ADMISSIONS

- > Massachusetts
- > Rhode Island
- > First Circuit Court of Appeals
- > Second Circuit Court of Appeals
- > Supreme Court of the United States

EDUCATION

- > Boston University School of Law, J.D., cum laude, 1983
- Clark University, B.A., summa cum laude, Phi Beta Kappa, 1980

partner, executive committee member Thomas M. Sobol

Voted Massachusetts Ten Leading Litigators — The National Law Journal

CURRENT ROLE

- > Partner & Executive Committee Member, Hagens Berman Sobol Shapiro LLP
- > Leads Hagens Berman's Boston office
- > Leader in drug pricing litigation efforts against numerous pharmaceutical and medical device companies
- > Lead negotiator in court-approved settlements totaling more than \$2 billion
- > Currently court-appointed lead counsel for *In re Skelaxin Antitrust Litigation, In re Nexium Antitrust Litigation, In re Lipitor Antitrust Litigation, In re Effexor Antitrust Litigation, and In re Wellbutrin XL Antitrust Litigation*
- > Appointed lead counsel in MDL No. 2149: In re New England Compounding Pharmacy Litigation Multidistrict Litigation, representing more than 700 victims who contracted fungal meningitis or other serious health problems as a result of receiving contaminated products produced by NECC, resulting in a \$200 million settlement
- > Lead counsel to the *Prescription Access Litigation (PAL)* project, the largest coalition of health care advocacy groups that fight illegal, loophole-based overpricing by pharmaceutical companies

RECENT SUCCESS

- > Neurontin class action marketing settlement (\$325 million)
- > NECC meningitis outbreak settlement (\$200 million)
- > Flonase direct purchaser litigation settlement (\$150 million)
- > Wellbutrin XL direct purchaser litigation (\$37.5 million)
- > First Databank litigation (4% price reduction of most retail drugs)
- > McKesson litigation (\$350 million)
- > Zyprexa litigation on behalf of the State of Connecticut (\$25 million)
- > Vioxx third party payor litigation (\$80 million)
- > Paxil direct purchaser litigation (\$150 million)
- > Co-lead trial counsel in the Neurontin MDL (\$142 million RICO jury verdict)

RECOGNITION

> Massachusetts Ten Leading Litigators, The National Law Journal

EXPERIENCE

- > Seventeen years in large Boston firm handling large complex civil litigation
- > Special Assistant Attorney General for the Commonwealth of Massachusetts and the states of New Hampshire and Rhode Island
- > Private counsel for Massachusetts and New Hampshire in ground breaking litigation against tobacco industry (Significant injunctive relief and recovery of more than \$10 billion)
- > Judicial clerk for Chief Justice Allan M. Hale, Massachusetts Appeals Court, 1983-1984
- > Board Chairman, New England Shelter for Homeless Veterans, 1995-2002

PARTNER, EXECUTIVE COMMITTEE MEMBER Thomas M. Sobol

NOTABLE CASES

> \$142 Million Civil RICO Jury Verdict in Massachusetts Over Neurontin

On Mar. 25, 2010, following a four-and-a-half week trial and two days of deliberations, a jury in the U.S. District Court for Massachusetts returned a \$142 million RICO verdict against Pfizer, Warner Lambert and Parke Davis in a suit related to Pfizer's fraudulent and unlawful promotion of the drug Neurontin. The jury also found, in an advisory capacity, that defendants violated the California Unfair Competition Law. HBSS served as co-lead trial counsel for plaintiffs Kaiser Foundation Health Plans and Kaiser Foundation Hospitals. HBSS attorneys played a pivotal role in preparing the case for trial. Thomas Sobol, managing partner of the HBSS Boston office, examined seven economic and scientific experts and presented the evidence of Defendants' decade-long campaign of fraudulent and deceptive actions in his closing argument that resulted in the RICO verdict. Post-trial briefing is underway and a final judgment has not yet been entered.

Kaiser Foundation Health Plan, et al v. Pfizer, Inc., et al, D.Mass., Civil Action No. 04-cv-10739 (PBS).

angle \$150 Million Settlement for Consumers and TPPs for Purchases of Lupron

In late 2004, HBSS announced a proposed resolution on behalf of consumers and third-party payors of Lupron in the amount of \$150 million. The litigation alleged widespread fraudulent marketing and sales practices against TAP Pharmaceuticals, a joint venture between Abbott Laboratories and Takeda Pharmaceuticals, Inc., and followed TAP's agreement to pay \$875 million in combined criminal and civil penalties regarding marketing and sales practices for the prostate cancer drug Lupron. HBSS served as court-appointed Co-Lead and Liaison Counsel.

In re Lupron Marketing and Sales Practices Litigation, D.Mass., MDL No. 1430.

> \$150 Million Resolution on Behalf of Direct Purchasers of Paxil

HBSS announced a \$150 million resolution of claims in 2004 in litigation on behalf of direct purchasers of the "blockbuster" selective serotonin reuptake inhibitor Paxil, manufactured by GlaxoSmithKline Corporation. The suit alleged that GSK engaged in sham litigation with respect to certain patents, all in an effort to delay competition from the entry of a generic form of the drug. HBSS served as court-appointed Co-Lead Counsel.

In re Paxil Direct Purchaser Litigation, E.D.Pa., Civil Action No. 03-4578.

> The Major First Databank Price Rollback

The First Circuit Court of Appeals recently affirmed the approval of a settlement reached between plaintiff health benefit plans and consumers in a class action against defendants First DataBank, Inc. and Medi-Span, two leading drug pricing publishers. The settlement resulted in a rollback of benchmark prices of some of the most common prescription medications and which could save consumers and other purchasers hundreds of millions of dollars. The settlement stems from a 2005 class-action lawsuit brought on behalf of health benefit plans and consumers against First DataBank (FDB) and McKesson Corporation, a large pharmaceutical wholesaler. Plaintiffs claimed that beginning in 2001, FDB and McKesson secretly agreed to raise the markup between the Wholesale Acquisition Cost and the Average Wholesale Price from 20 to 25 percent for more than 400 drugs, resulting in higher profits for retail pharmacies at the expense of consumers and payors.

PARTNER, EXECUTIVE COMMITTEE MEMBER Thomas M. Sobol

On June 6, 2007, Judge Patti B. Saris of the District of Massachusetts preliminarily approved a settlement between the parties whereby FDB agreed to roll back pricing by five basis points, from 1.25 to 1.20, on the drugs included in the lawsuit as well as hundreds of other drugs, which should create cost-savings on a much broader range of prescription medications. An alphabet soup of associations representing pharmacies and pharmacy benefit managers fought the proposed rollback before federal trial and appellate courts, claiming either that small pharmacies would be put out of business through implementation of the rollback or that the savings to health plans and consumers would not be enough to justify the settlement. The courts rejected these claims and in a ruling on Sept. 4, 2009, the First Circuit Court of Appeals affirmed the approval of the settlement.

New England Carpenters Health Benefits Fund et al v. First DataBank, Inc. and McKesson Corp., D.Mass., Civil Action No. 05-cv-11148-PBS; District Council 37 Health and Security Plan et al v. Medi-Span, D.Mass., Civil Action No. 07-cv-10988-PBS.

> \$75 Million Resolution Against GSK and Its Predecessors for Relafen

HBSS was court-appointed liaison counsel, and the firm has helped spearhead this litigation against GlaxoSmithKline Corporation and its predecessors, alleging that GSK fraudulently obtained a patent to prevent a generic version of Relafen, a frequently prescribed brand name pharmaceutical, from coming to market. Litigated for 12 to 18 months, HBSS announced a proposed \$75 million resolution of end-payor claims in 2004.

In re Relafen Antitrust Litigation, D.Mass., Master File No. 01-12239-WGY.

> \$25 Million for the State of Connecticut for Zyprexa Fraud

On Oct. 5, 2009, Judge Jack B. Weinstein, U.S. District Court Judge in the Eastern District of New York, entered an Order for Entry of Final Judgment in State of Connecticut v. Eli Lilly and Co., approving the \$25 million settlement reached by the parties to conclude the state's Zyprexa litigation. HBSS served as outside counsel to Attorney General Richard Blumenthal in the litigation that alleged Lilly engaged in unlawful off-label promotion of the atypical antipsychotic Zyprexa and made significant misrepresentations about Zyprexa's safety and efficacy, resulting in millions of dollars in excess pharmaceutical costs borne by the state and its taxpayers.

State of Connecticut v. Eli Lilly & Co., E.D.N.Y., Civil Action No. 08-cv-955-JBW.

> \$65.7 Million Recovery in Antitrust Action Concerning Tricor

On Oct. 29, 2009, Chief Judge Sue Robinson of the District of Delaware approved a \$65.7 million recovery for consumers and third party payors who sued Abbott Laboratories and Fournier Industries in an antitrust action concerning the cholesterol drug Tricor. Plaintiffs alleged Abbott and Fournier manipulated the statutory framework regulating the market for pharmaceuticals by instituting baseless patent litigation against generic manufacturers, and manipulative switching of dosage strengths and forms, which resulted in delayed entry of generics and thus lower prices into the market. HBSS served as Co-Lead Class Counsel in the case.

In re Tricor Indirect Purchaser Antitrust Litigation, D.Del., Civil Action No. 05-cv-360.



PARTNER, EXECUTIVE COMMITTEE MEMBER Anthony D. Shapiro

Mr. Shapiro has handled hundreds of personal injury matters securing results in excess of \$1 million for his clients numerous times.

CONTACT

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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Antitrust Litigation
- > Personal Injury Litigation

BAR ADMISSIONS

> Washington State Bar

EDUCATION

- > Georgetown University Law Center, J.D., 1982
- > Colgate University, B.A., History, 1979

CURRENT ROLE

- > Partner & Executive Committee Member, Hagens Berman Sobol Shapiro LLP
- > Leads Personal Injury Group including wrongful death, brain injury and catastrophic personal injury matters resulting from construction site, workplace, automobile accidents, product liability and nursing home negligence
- > Prominent role in many of the firm's notable antitrust class actions

RECENT SUCCESS

- > Lead counsel in *In re DRAM Antitrust Litigation* (more than \$400 million)
- > Plaintiffs' executive committee in a number of prominent antitrust class actions including *In re LCD Antitrust Litigation* (\$500 million)

RECOGNITION

- > Earned AV rating by Martindale-Hubbell, the highest rating a lawyer can obtain, indicating a very high to preeminent legal ability and exceptional ethical standards as established by confidential opinions from members of the Bar
- > Washington Super Lawyer, 2000-2014

EXPERIENCE

- > King County, Washington Prosecuting Attorney's Office, where he represented the state in more than 50 serious felony jury trials, including some of the state's most high-profile cases
- > Founding Partner, Rohan Goldfarb & Shapiro
- > Schweppe Krug & Tausend

LEGAL ACTIVITIES

- > Instructor, National Institute of Trial Advocacy
- > Adjunct Professor, University of Washington Law School

NOTABLE CASES

- > Mantria Class Action
- > Air Cargo Antitrust Litigation
- > Baby Food Antitrust Litigation
- > Brand Name Prescription Drug Antitrust Litigation
- > Bromine Antitrust Litigation
- > Carbon Dioxide Antitrust Litigation
- > Carpet Antitrust Litigation
- > Commercial Tissue Products Antitrust Litigation

Anthony D. Shapiro

- > Compressors Antitrust Litigation
- > Concrete Antitrust Litigation
- > Containerboard Antitrust Litigation
- > CRT Antitrust Litigation
- > DRAM Antitrust Litigation
- > Exxon Valdez Oil Spill Litigation
- > Fasteners Antitrust Litigation
- > Flat Glass Antitrust Litigation
- > Forced Place Insurance Wind Antitrust Litigation
- > High Fructose Corn Syrup Antitrust Litigation
- > Infant Formula Antitrust Litigation
- > Lease Oil Antitrust Litigation
- > Linerboard Antitrust Litigation
- > LCD Antitrust Litigation
- > Magazine Paper Antitrust Litigation
- > Medical X-Ray Film Antitrust Litigation
- > OSB Antitrust Litigation
- > Polyurethane Antitrust Litigation
- > Scouring Pads Antitrust Litigation
- > SRAM Antitrust Litigation
- > Steel Antitrust Litigation
- > Toilet Nut Product Defect Litigation



Robert B. Carey

PARTNER. EXECUTIVE COMMITTEE MEMBER

Rob added to HB's office a built-in mock courtroom, complete with jury box, audio-visual equipment to record witnesses and lawyers, and separate deliberation rooms for two juries. Download photo »

Mr. Carey handles class-action lawsuits against many different types of organizations and companies. Recently, he has litigated the Propane Exchange Tank Litigation, Hyundai/Kia MPG Litigation, and the Swift Truckers Litigation. He has served as lead counsel in cases such as the LifeLock Sales and Marketing Litigation, Hyundai Motor America's cases on sub-frame corrosion and airbag systems, and the State of Arizona's claim against McKesson Corporation for overcharging on prescription drugs.

Mr. Carey experience extends to bad-faith insurance, personal injury, medical malpractice, with several jury trials involving verdicts with as much as \$75 million at stake. He has argued high-profile cases in federal and state courts across the country. In the '90s, he served as trial counsel on claims by counties for damages stemming from tobacco-related illnesses (and acted as special counsel for Hagens Berman in seeking to recover damages in the landmark tobacco litigation), and since then has led dozens of consumer and insurance class actions in various states.

From 1990 to 1996, as Chief Deputy Attorney General, Mr. Carey oversaw all major legal, policy, legislative, and political issues for the Arizona attorney general's office. There, Mr. Carey developed and spearheaded passage of Arizona's law requiring the DNA testing of all sex offenders and the law requiring that criminals pay the cost of victims' rights. He was a principal drafter of the first major overhaul of Arizona's criminal code, and drafted key parts of the federal Prisoner Litigation Reform Act of 1995 for Senators Dole and Kyl. He served as a campaign staffer, intern, and staff member for U.S. Senator John McCain, during and after Senator McCain's first run for public office. In the past, he served as a judge pro tempore in Maricopa County Superior Court, presiding over contract and tort jury trials. Recognized by the judges of the Superior Court of Arizona in Maricopa County for outstanding contributions to the justice system, Mr. Carey enjoys teaching law and public policy courses, most recently at the ASU's Sandra Day O'Connor College of Law.

Mr. Carey earned his bachelor's degree at Arizona State University, and received his MBA and law degree from the University of Denver. He also attended Harvard University's John F. Kennedy School of Government, where he studied in the state and local government program.

CURRENT ROLE

- > Partner & Executive Committee Member, Hagens Berman Sobol Shapiro LLP
- > Leads Hagens Berman's Phoenix and Colorado Springs offices
- > Practice focuses on class-action lawsuits, including auto defect, insurance, right of publicity and fraud cases
- > Frequently asked to handle jury trials for high-value cases

RECENT SUCCESS

- > Over the summer of 2012, Rob was lead counsel in Robin Antonick's case against Electronic Arts, where a jury heard evidence that Electronic Arts failed to pay Antonick for over 20 years for his work in coding and developing the legendary Madden NFL Football video game. This trial, held in the Northern District of California, resulted in two verdicts for Antonick and was dubbed a "Top Trial Verdict of 2013" by The Daily Journal, a leading legal publication.
- > Helped start HB's efforts against GM for its ignition system and other recall problems, which is now in the MDL with Hagens Berman leading the litigation
- > Helped originate the Toyota Sudden Unintended Acceleration case, filing the initial Hagens Berman's 40

CONTACT

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YEARS OF EXPERIENCE

> 29

PRACTICE AREAS

- > Personal Injury Litigation
- > Insurance Bad Faith
- > Breach of Contract Claims

BAR ADMISSIONS

- > Arizona
- > Colorado
- > U.S. Supreme Court
- > U.S. Court of Appeals, Fifth Circuit
- > U.S. Court of Appeals, Eighth Circuit
- > U.S. Court of Appeals, Ninth Circuit
- > U.S. Court of Appeals, Tenth Circuit
- > Various federal district courts

EDUCATION

- > University of Denver, M.B.A., J.D., 1986
- > Arizona State University, B.S., 1983
- Harvard University, John
 F. Kennedy School of
 Government, State & Local
 Government Program, 1992

PARTNER, EXECUTIVE COMMITTEE MEMBER Robert B. Carey

complaints for a case that eventually settled for \$1.6 billion

- > Prevailed in a jury trial in a copyright case about the iconic Madden NFL video game, with two jury verdicts against Electronic Arts. The effort was selected by The Daily Journal, a leading legal publication, as a Top Trial Verdict of 2013
- > Led Hagens Berman's efforts on the \$400 million settlement with Hyundai and Kia corporations over misrepresentations about MPG ratings
- > Helped secure a first-ever (\$60M) settlement for collegiate student-athletes (Keller, consolidated with O'Bannon) from Electronic Arts (EA) and the NCAA for the misappropriation of the student-athletes' likenesses and images for the EA college football video game series. This groundbreaking suit went up to the U.S. Supreme Court before a settlement was reached, providing student-athletes, even current ones, with cash recoveries for the use of their likenesses without permission.
- > Numerous jury verdicts in trials, including complex matters, phasing of threshold issues, liability and damages, trials with more than \$75M at stake and recoveries of treble and punitive damages
- > While serving as Arizona Chief Deputy Attorney General:
 - Helped secure a \$4 billion divestiture and a landmark \$165 million antitrust settlement
 - Helped revise Arizona's criminal code and authored the section of the federal Prisoner Litigation Reform Act of 1995 that virtually eliminated frivolous prisoner lawsuits

RECOGNITION

- > Recognized by the judges of the Superior Court of Arizona in Maricopa County for outstanding contributions to the justice system
- > U.S. Department of Justice, recognized for victims' rights efforts
- > Listed since 2008 as a Top 100 Trial Lawyer by Arizona's Finest Lawyers and National Trial Lawyers
- > For his work with the Hagens Berman Toyota team, Mr. Carey was selected as a Finalist for Public Justice's 2014 Trial Lawyer of the Year.

EXPERIENCE

- > Arizona Chief Deputy Attorney General
- > Adjunct Professor, Sandra Day O'Connor College of Law
- > Judge Pro Tempore, Maricopa County Superior Court

LEGAL ACTIVITIES

> Member and Former Chairman, Arizona State Bar Class Action and Derivative Suits Committee

PUBLICATIONS

> Co-author of the Arizona chapter of the ABA's "A Practitioner's Guide to Class Actions"

NOTABLE CASES

- > Toyota Unintended Acceleration Litigation
- > NCAA Student-Athlete Name and Likeness Licensing Litigation
- > Swift Truckers Litigation
- > Hyundai Subframe Defect Litigation
- > Hyundai Occupant Classification System / Airbag Litigation
- > Hyundai Horsepower Litigation
- > Arizona v. McKesson False Claims and Consumer Protection Litigation (representing State of Arizona)
- > Student-Athlete Likeness Litigation against CBS Sports and Printroom
- > Student-Athlete Likeness Litigation against T3 Media
- > LifeLock Sales and Marketing Litigation
- > Rexall Sundown Cellasene Litigation

> Insurance bad faith against major carriers and personal injury cases, including dozens of seven-figure verdicts and settlements

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YEARS OF EXPERIENCE

> 15

PRACTICE AREAS

- > Commercial Litigation
- > Mass Tort
- > Appellate Advocacy
- > Personal Injury

BAR ADMISSIONS

- > U.S. District Court, District of Arizona
- > U.S. District Court, District of Colorado

EDUCATION

- > Stanford Law School, J.D., 2001
- > Arizona State University, B.A., History and Political Science, summa cum laude, 1998

PARTNER

Leonard W. Aragon

Before attending college, Mr. Aragon fulfilled his dream as a scout for the 2/68 Armored Tank Battalion.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Practice focuses on nationwide class actions and other complex litigation
- Currently counsel for plaintiffs in the highly publicized cases Keller v. Electronic Arts and In re NCAA Student-Athlete Name and Likeness Licensing Litigation which alleges that video game manufacturer Electronic Arts, the National Collegiate Athletic Association, and the Collegiate Licensing Company used the names, images and likenesses of student-athletes in violation of state right of publicity laws and the NCAA's contractual agreements with the student-athletes. The plaintiffs reached a settlement with EA and the CLC in May for \$40 million and reached a settlement in June with the NCAA for \$20 million. The parties are in the process of seeking approval from the Court for the two settlements.

RECENT SUCCESS

- > Multimillion dollar jury verdict believed to be the largest in Columbiana County, Ohio history
- > Multimillion dollar class-action settlement on behalf of a nationwide class of student-athletes whose images were used on a website affiliated with CBS Interactive without their permission or compensation
- > Obtained two jury verdicts in favor of the original developer of the Madden Football video game franchise in phased trial over unpaid royalties

RECOGNITION

> Super Lawyers, Rising Star: Class Action/Mass Tort

LEGAL ACTIVITIES

- > Adjunct Professor, Sandra Day O'Connor College of Law, Arizona State University
- > State Bar of Arizona Bar Leadership Institute Class I
- > Pro bono work in insurance, immigration, family and contract law

NOTABLE CASES

- > In re NCAA Student-Athlete Name and Likeness Licensing Litigation
- > Keller v. Electronic Arts Inc.
- > Antonick v. Electronic Arts Inc.
- > In re Swift Transportation Co., Inc.
- > Hunter v. Hyundai Motor America
- > Jim Brown v. NCAA; Liebich v. Maricopa County Community College District

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YEARS OF EXPERIENCE

> 11

PRACTICE AREAS

- > Antitrust Litigation
- > Consumer Rights
- > Mass Torts
- > Medical Devices
- > Pharmaceuticals/Health Care Fraud

BAR ADMISSIONS

- > Massachusetts
- > U.S. District Court, District of Massachusetts
- > U.S. Court of Appeals, Second Circuit, Eleventh Circuit
- > Supreme Court of the United States

EDUCATION

- > Boston College Law School, J.D., cum laude, Articles
 Editor, Boston College Law Review, 2005
- > Williams College, B.A., International Relations, cum laude, 1998

PARTNER

Lauren Guth Barnes

Ms. Barnes was honored with a 2013 Excellence in the Law Up & Coming Lawyer award by the Massachusetts Bar Association and Mass Lawyers Weekly.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on antitrust, consumer protection and RICO litigation against drug and medical device manufacturers, in complex class actions and personal injury cases for consumers, large and small health plans, direct purchasers and state governments
- > Helped reach a \$73 million class settlement for direct purchasers in MDL No. 2343: In re. Skelaxin Antitrust Litigation
- > Co-lead class counsel for direct purchasers in In re Niaspan Antitrust Litigation
- > Liaison counsel for In re Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation
- > Co-lead class counsel for direct purchasers in the Suboxone and Solodyn MDLs
- > Represents health benefit providers in the firm's Ketek and copay subsidies class litigation, and individuals harmed by pharmaceuticals such as Yaz, Actos and Granuflo and medical devices including pelvic mesh
- > Pro bono counsel in a successful constitutional challenge to the Commonwealth of Massachusetts' exclusion of legal immigrants from the state's universal healthcare program

RECOGNITION

- > National Law Journal Boston Rising Star Award (2014)
- > Massachusetts Academy of Trial Attorneys President's Award (2014)
- > Massachusetts Bar Association Up & Coming Lawyer Award (2013)
- > AAJ New Lawyers Division Excellence Award (2009-2010, 2010-2011)
- > AAJ New Lawyers Division Above and Beyond Award (2011-2012)
- > AAJ Wiedemann & Wysocki Award (July 2012, July 2013)

EXPERIENCE

- > Active in the fights against forced arbitration federal preemption of consumer rights, working to ensure the public maintains access to the civil justice system and the ability to seek remedies when companies violate the law
- > Co-authored an amicus brief to the Supreme Court in Pliva v. Mensing on this issue on behalf of practitioners and professors who teach and write on various aspects of pharmaceutical regulation and the delivery of healthcare

PARTNER

Lauren Guth Barnes

Conflict Management Group where she worked with members of the United Nations High Commissioner for Refugees on a pilot project in Bosnia-Herzegovina designed to ease tensions and encourage reconciliation in post-conflict societies and contributed to Imagine Coexistence, a book developed out of the collaboration

LEGAL ACTIVITIES

> American Association for Justice (AAJ)

- Executive Committee, Member (2014-present)
- Board of Governors, Member (2012-present)
- Women Trial Lawyers Caucus, Former Chair (2012-2013)
- Class Action Litigation Group, Former Co-Chair (2011-2012)
- New Lawyers Division, Board of Governors (2009 to present)
- Committees (various), Member
- AAJ Trial Lawyers Care Task Force, Member (2012-present)
- > Massachusetts Academy of Trial Attorneys
 - Executive Committee, Member (2012-2013)
 - Board of Governors, Member (2011-present)
 - Women's Caucus, Co-Chair (2008 to present)
- > Boston Bar Association, Class Action Committee, Co-Chair (2014-present)
- > Public Justice, Class Action Preservation Project, Member

NOTABLE CASES

> Antitrust action for direct purchasers of Skelaxin

On Sept. 24, 2014, Judge Curtis Collier of the Eastern District of Tennessee approved a \$73 million settlement for direct purchasers of Skelaxin in litigation alleging Skelaxin's manufacturer colluded with would-be generic competitors, fraudulently delaying generic competition and leading to higher prices. Metaxalone was sold under the brand name Skelaxin since 1962, but the original patent expired in 1979. Manufacturers applied to market generic metaxalone in 2002, and generic competitors remained foreclosed from marketing generic metaxalone until 2010. Hagens Berman served as lead counsel for direct purchasers.

In re Skelaxin (Metaxalone) Antitrust Litigation, E.D.TN., Civil Action No. 1:12-md-2343.

> Health care coverage for 40,000 legal immigrants in Massachusetts

On Jan. 5, 2012, the Massachusetts Supreme Judicial Court ruled unanimously that a state law barring 40,000 low-income legal immigrants from the state's universal health care program unconstitutionally violates those immigrants' rights to equal protection under the law and must be struck down. Hagens Berman served as pro bono counsel.

Finch v. Commonwealth Health Insurance Connector Authority, Mass., Civil Action No. SJC-11025.

Lauren Guth Barnes

> \$25 million for the state of Connecticut for Zyprexa fraud

On Oct. 5, 2009, U.S. District Court Judge Jack B. Weinstein approved a \$25 million settlement reached by the parties to conclude the state's Zyprexa litigation that alleged Lilly engaged in unlawful off-label promotion and misrepresented Zyprexa's safety and efficacy, resulting in millions of dollars in excess pharmaceutical costs. Hagens Berman served as outside counsel to Attorney General Richard Blumenthal.

State of Connecticut v. Eli Lilly & Co., E.D.N.Y., Civil Action No. 08-cv-955-JBW.

PUBLICATIONS

"How Mandatory Arbitration Agreements and Class Action Waivers Undermine Consumer Rights and Why We Need Congress to Act," Harvard Law and Policy Review, August 2015

EXPERIENCE

Unlike many of her colleagues at HBSS, Lauren does not run marathons – unless chasing after her small children count. Lauren did wrestle in college but refused to don the wrestling singlet. Whenever she can, Lauren rock climbs with her in-laws, breathes deeply at yoga, and hosts dinner parties to, despite usual advice, try totally new recipes. She also keeps the pizza delivery guy on speed dial as back-up for such occasions.

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YEARS OF EXPERIENCE

PRACTICE AREAS

> Personal Injury Litigation> Civil Rights

BAR ADMISSIONS

- > Washington
- > U.S. District Court, Western District of Washington
- > U.S. District Court, Eastern District of Washington
- > United State Bankruptcy Court for the Western District of Washington
- > Ninth Circuit Court of Appeals

EDUCATION

- > Connecticut College, B.A., 1999
- > Seattle University School of Law, J.D., magna cum laude, 2004

PARTNER

Ian M. Bauer

Mr. Bauer has been at the forefront of child and social welfare policymaking and litigation in Washington State over the past decade, and has extensive experience in litigation involving abuse, neglect and exploitation of children and vulnerable adults.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on personal injury and civil rights cases

RECENT SUCCESS

Mr. Bauer has litigated numerous multi-million dollar cases involving children and vulnerable adults who have suffered profound abuse, neglect or exploitation. Recent recoveries include:

- > Settlement on behalf of five children abused and neglected by their biological parents (\$9.75 million)
- > Settlement on behalf of a developmentally-disabled woman who was abused, neglected and financially exploited by her state-paid, in-home caregiver (\$5.52 million)
- > Settlement on behalf of an infant abused in day care setting (\$2.84 million)
- > Settlement on behalf of a developmentally-disabled woman abused and neglected by her state-paid, in-home caregiver (\$2.5 million)

RECOGNITION

- > Mr. Bauer has received an AV rating from Martindale-Hubbell, the highest peer-reviewed national rating a lawyer can obtain, reflecting a preeminent legal ability and exceptional ethical standards.
- > Rising Star, Washington Law & Politics Magazine (2009, 2016, 2017)

EXPERIENCE

Prior to joining Hagens Berman, Mr. Bauer's served as an Assistant Attorney General with the Washington State Attorney General's Office. In this role, Mr. Bauer coordinated the defense of civil rights and tort litigation against DSHS, WSDOT, WSP and other state agencies, and supervised two teams of highly-experienced attorneys and professional staff. Mr. Bauer also carried a significant caseload of high-profile tort and civil rights cases, as well as cases involving the operation and funding of Washington's foster care, mental health and public assistance systems. Mr. Bauer also advised executive-level agency staff and state risk managers on a wide variety of complex legal issues, including tactical litigation decisions, the implications of legislative, judicial, political and policy decisions, and emergent situations involving the risk of significant exposure.

LEGAL ACTIVITIES

> Member, Washington Association for Justice

> Member, American Association for Justice

PERSONAL INSIGHT

Mr. Bauer is a former collegiate soccer player who continues to follow the game religiously.



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YEARS OF EXPERIENCE

PRACTICE AREAS

Securities Litigation
 Antitrust Litigation

BAR ADMISSIONS

- > California
- > Illinois

COURT ADMISSIONS

- > Supreme Court of the United States
- > Supreme Court of California
- > Supreme Court of Illinois
- > U.S. District Court for the Northern District of California
- > U.S. District Court for the
- Central District of California > U.S. District Court for the
- Northern District of Illinois
- > U.S. District Court of Colorado
- > U.S. District Court for the Eastern District of Wisconsin
- > U.S. District Court for the Western District of Wisconsin
- > U.S. Court of Appeals, Ninth Circuit

EDUCATION

- > Southern Illinois University at Carbondale, J.D., 1996
- > DePauw University, B.A., 1992

Partner Peter E. Borkon

Providing institutional investors practical advice and solutions.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice is focused on complex civil litigation, particularly securities and antitrust class actions and shareholder derivative suits

RECENT SUCCESS

- > Key team member in *In re Homestore Securities Litigation* (more than \$100 million settlement)
- > Team member in several securities class actions including:
- In re Charles Schwab Corp. Securities Litigation (\$235 million settlement)
- In re China Media Express Holdings, Inc. Securities Litigation (\$12 million settlement)
- In re Northwest Biotherapeutics Securities Litigation (\$1 million settlement)
 - In re BigBand Networks Securities Litigation (\$11 million settlement)
 - In re Reserve YieldPlus Fund Securities Litigation (currently in mediation)
 - In re JP Morgan Madoff Litigation (\$218 million settlement)
- In re Oppenheimer Core & Champion Bond Funds (\$100 million settlement)

RECOGNITION

- > Northern California Rising Star, Super Lawyers Magazine, 2010, 2011
- > Super Lawyer, Super Lawyers Magazine, 2012, 2015 2017
- > Steinberg Leadership Fellow with the Anti-Defamation League

EXPERIENCE

- > Clerk, Chief Judge of the Southern District of Illinois
- > Staff Attorney, Ninth Circuit Court of Appeals
- > Adjunct Professor at the University of California Hastings College of Law

LEGAL ACTIVITIES

> Director, U.S. District Court for the Northern District of California's Federal Practice Program Board (2015 - 2018)

> Member, Ninth Circuit Lawyer Representatives Committee for the Northern District of California (2015 - 2018)

> Co-Chair, Ninth Circuit Lawyer Representatives for the Northern District of California (2016 - 2017)

- > Member, Council of Institutional Investors (CII)
- > Member and Speaker, Michigan Association of Public Employee Retirement Systems (MAPERS)
- > Member, State Association of County Retirement Systems (SACRS)
- > Member, California Association of Public Retirement Systems (CALAPRS)

Partner Peter E. Borkon

> Member and Speaker, Illinois Public Pension Fund Association (IPPFA)

> Member and Speaker, Georgia Association of Public Pension Trustees (GAPPT)

> Member, Alternative Investments working group, National Association of Public Pension Attorneys (NAPPA)

- > Chair, SEC working group, National Association of Public Pension Attorneys (NAPPA)
- > Member and Speaker, National Conference on Public Employee Retirement Systems (NCPERS)
- > Member, National Association of Securities Professionals (NASP)
- > Member, National Council on Teacher Retirement (NCTR)
- > Co-Chair of the Board of Directors of the AIDS Legal Referral Panel
- > Co-Chair of the Bay Area Lawyers for Individual Freedom's Judiciary Committee
- > Trained to serve as a Judge Pro Tem in San Mateo County
- > Serves as a Judge Pro Tem in the City and County of San Francisco Superior Court
- > Member, Federal Bar Association, Northern District of California Chapter
- > Member, Alameda County Bar Association
- > Member, Bar Association of San Francisco

PRESENTATIONS

- > "The New Normal: Potential Revisions to the Securities Law and Regulations Under the New Administration," NCPERS Legislative Conference, January 2017
- > "Recent Legal Developments A Panel Discussion," GAPPT Annual Conference, September 2016
- > "Top Ten Practices of High Performing Public Retirement Plan Boards," NCPERS Public Safety Employees Pension & Benefits Conference, October 2015
- > "Fee Shifting, Bylaws and Courts: The Ever-Shrinking World of Investor Protections!," GAPPT Annual Conference, September 2015
- > "Funds, Fees & Affiliates (Oh, My!) SEC OCIE's Examination of the Private Fund World," NAPPA 2015 Legal Education Conference, June 2015
- > "Securities Litigation: A Panel Discussion," MAPERS Spring Conference, May 2014
- "Who Wants To Be A Fiduciary?," NCPERS, Trustee Educational Seminar, April 2014 Annual Securities Litigation & Enforcement 2014 Update Panel Discussion, April 2014
- > "A Different Kind of Income Pick-Up Strategy," CFA Society of New Mexico, December 2013
- > "SEC Announces Its 'Top Priorities' Include Enforcement Against States Issuing Municipal Bonds; Are County Issuers Next?," CACTTC, Annual Conference, June 2013
- * Avoiding a Front Page Scandal at Your Pension Fund: Learning by Example," NCPERS, Annual Conference, May 2013
- > Board Ethics Training at the Ohio Police and Fire Pension Fund, April 2013
- > "International Investment after Morrison," GAPPT, Annual Conference, September 2012
- > Legal Round Table, MAPERS, Spring Conference, May 2012
- "Opportunities to Recover Fund Assets Using Securities Litigation," IPPFA, Spring Conference, May 2012

Partner Peter E. Borkon

- > "The Good, the Bad and the Ugly –The Safety Pension Edition," NCPERS, TEDS Conference, May 2012
- > "Occupy Wall Street through Reform of the Securities Law," NCPERS, Legislative Conference, February 2012
- > "The Good, the Bad and the Ugly The Safety Pension Edition," NCPERS, Public Safety Employee Pension & Benefit Conference, October 2011
- "Protection vs. Interference What the New Federal Regulations Mean to Institutional Investors," NCPERS, Annual Conference, May 2011
- "The Immediate Need for Congress to Act on Investor Friendly Legislation," NCPERS, Annual Conference, May 2010

PUBLICATIONS

- "Post-Morrison: The Global Journey Towards Asset Recovery," Reed R. Kathrein, Peter E. Borkon, Nick S. Singer, contributing members, NAPPA Morrison Working Group, June 2016
- "Omnicare: It's Not a Lie if I Believe What I Say, Right?," Hagens Berman, HBSS Securities News, Fall 2015
- "Fasten Your Seatbelts, Supreme Court Creating a Bumpy Ride... or, Is it?," Hagens Berman, HBSS Securities News, Summer 2014
- SEC's Message: Bond Issuers Must Provide Full, Accurate and Timely Information About Their Financial Condition or Face Prosecution," Hagens Berman, HBSS Securities News, November 2013
- > "Court Limits SEC's Foreign Reach," Hagens Berman, HBSS Securities News, May 2013
- "Living in a Post-Morrison World: How to Protect Your Assets Against Securities Fraud," Reed R. Kathrein, Peter E. Borkon, contributing members, NAPPA Morrison Working Group, 2012
- > "Say-On-Pay More Bark Than Bite?," Hagens Berman, HBSS Securities News, November 2012
- "Citizens United and the Assault on Public Pensions," NCPERS, PERSist Article, Summer 2012, Volume 25, Number 3, August 2012
- Citizens United and The Assault on Public Pensions, Marin County Association of Retired Employees / A member of CRCEA-California Retired County Employees Association, Keeping in Touch Letter", June 2012
- "Citizens United and the Assault on Public Pensions," Hagens Berman, HBSS Securities News, May 2012
- "Investors Need Private Enforcement of Securities Law," Hagens Berman, HBSS Securities News, November 2011
- "Balancing Sensible Governance Against Failed Principles: Is this the End to the Wild West of Investing?," NAPPA, The NAPPA Report, October 2008



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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Securities / Investor Fraud
- > Consumer Rights
- > Products Liability

BAR ADMISSIONS

- > Supreme Court of Washington
- > USDC, Western District of Washington
- > U.S. Court of Appeals, Third Circuit

EDUCATION

- > University of Maryland Law School, J.D., Notes and Comments Editor, Maryland Law Review
- > Georgetown University, B.A.

Jeniphr A.E. Breckenridge

Ms. Breckenridge has practiced with the firm since its founding in 1993.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP, where she has practiced since the firm's founding.
- > Practice concentrates on class actions, including consumer, automobile defects, securities litigation fraud, and wage and hour claims

NOTABLE CASES

- > Metropolitan Securities Litigation
- > Boeing Securities Litigation
- > Raytheon Securities Litigation
- > Average Wholesale Price Litigation
- > In re Pet Food Products Liability Litigation
- > Toyota Unintended Acceleration Litigation
- > State Tobacco cases

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YEARS OF EXPERIENCE

> 14

PRACTICE AREAS

- > Consumer Protection
-) Qui Tam
- > Antitrust Litigation
- > Appellate

BAR ADMISSIONS

- > State Bar of California> U.S. District Court for the
- Central District of California
- > U.S. District Court for the Northern District of California
- > U.S. District Court for the Southern District of California
- > U.S. Court of Appeals for the Ninth Circuit
- > U.S. District Court for the Eastern District of California

EDUCATION

- > Harvard Law School, J.D., cum laude, 2002
- > University of Southern California, B.S., Public Policy, summa cum laude, 1999

PARTNER Elaine T. Byszewski

Involved in firm's representation of the city of Los Angeles and other municipalities in litigation against major banks for discriminating against minority borrowers

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Ms. Byszewski has litigated a number of complex class actions on behalf of consumers, employees and whistleblowers resulting in multi-million dollar settlements, including cases against Toyota, Ford, AstraZeneca Pharmaceuticals, Berkeley Premium Nutraceuticals, Solvay Pharmaceuticals, Costco, Apple and KB Homes.
- > Currently, Ms. Byszewski is involved in:
 - Hagens Berman's representation of the city of Los Angeles and other municipalities in litigation against major banks for discriminating against minority borrowers.
 - Multi-state antitrust action against major dairy cooperatives for colluding in the premature slaughter of a half a million cows to drive up the price of milk.
 - Deceptive advertising case against SeaWorld involving its undisclosed mistreatment of orcas.
 - Deceptive advertising case against SunRun.

RECENT SUCCESS

> Member of team led by Steve Berman that settled *Toyota Unintended Acceleration Litigation* for \$1.6 billion and was a finalist for Public Justice's Trial Lawyer of the Year award

NOTABLE CASES

- > Municipal Lending Discrimination Litigation
- > Dairy Cooperatives Antitrust Litigation
- > SeaWorld Consumer Lawsuit
- > Toyota Unintended Acceleration
- > Ford Spark Plugs
- > SunRun, Inc. Advertising Litigation
- > AstraZeneca Pharmaceuticals (Nexium) Litigation
- > Merck (Vioxx) Litigation
- > Berkeley Nutraceuticals (Enzyte) Litigation
- > Solvay Pharmaceuticals (Estratest) Litigation
- > Apple iPod Litigation
- > Costco Wage and Hour Litigation

EXPERIENCE

Prior to joining Hagens Berman, Ms. Byszewski focused her practice on labor and employment litigation and counseling. During law school she worked in the trial division of the office of the Attorney General of Massachusetts.

PARTNER Elaine T. Byszewski

PUBLICATIONS

- > "Valuing Companion Animals in Wrongful Death Cases: A Survey of Current Court and Legislative Action and A Suggestion for Valuing Loss of Companionship," Animal Law Review, 2003, Winner of the Animal Law Review's 5th Annual Student Writing Competition
- > "What's in the Wine? A History of FDA's Role," Food and Drug Law Journal, 2002
- > "ERISA and RICO: New Tools for HMO Litigators," Journal of Law, Medicine & Ethics, 2000

PERSONAL INSIGHT

Ms. Byszewski's proudest moment was teaching her older son to swim. Tennis is next on the agenda. Her biggest challenge is keeping her two year old out of trouble.

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YEARS OF EXPERIENCE

PRACTICE AREAS

) Qui Tam

- > Antitrust Litigation
- > Consumer Protection

BAR ADMISSIONS

- > Colorado
- > Illinois
- > District of Columbia

EDUCATION

- > University of Denver College of Law, J.D., 1998
- University of Chicago, B.A.,
 High Honors, Special Honors
 in English, 1993

Jennifer Fountain Connolly

Successfully litigates complex fraud cases involving all types of industries.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Leads Hagens Berman's Washington D.C. office
- > Practice focuses on pharmaceutical pricing fraud cases, *qui tam* litigation, antitrust class actions and other types of complex litigation
- > Specializes in cases with complex factual or procedural questions, many of which have related proceedings pending in multiple jurisdictions

RECENT SUCCESS

- > Significant role in litigation against McKesson Corporation alleging the company engaged in a scheme that raised the prices of more than 400 brand name prescription drugs (\$350 million settlement)
- > Public payor case for municipalities throughout the United States (\$82 million settlement)
- > Represented numerous state attorneys general in similar claims against McKesson
- > Key member of the Hagens Berman-led team that successfully tried the *Average Wholesale Price litigation* against four pharmaceutical company defendants, obtaining a verdict that was subsequently affirmed in all respects by the First Circuit Court of Appeals

EXPERIENCE

- > Partner, Wexler Wallace LLP
- > Associate, Netzorg McKeever Koclanes & Bernhardt LLP (now Sherman & Howard, LLC)
- > Assistant Attorney General, Business Regulation Unit, Colorado Attorney General's Office

NOTABLE CASES

- > McKesson Corporation Litigation
 - Private class action (\$350 million settlement)
 - Municipal class action (\$82 million settlement)
 - Multiple state attorney general actions were favorably resolved
- > AWP Litigation

Represented classes of consumers and third-party payors in a groundbreaking pharmaceutical fraud case in which the court approved a total of \$338 million in settlements

> Opioids Litigation

Representing the Orange County District Attorney's office in a case alleging five pharmaceutical companies orchestrated a false and misleading marketing scheme designed to reverse the popular and medical understanding of the serious risks of long-term opioid use for chronic, non-cancer pain

PARTNER

Jennifer Fountain Connolly

> Fannie Mae/Freddie Mac Takings Litigation

Representing shareholders in the Court of Federal Claims alleging that, in imposing the conservatorships over Fannie Mae and Freddie Mac in September 2008, the Government took private property without just compensation

> ATM Antitrust Litigation

Representing consumers challenging illegal agreements among Visa, MasterCard and member banks to charge inflated ATM access fees, in violation of the federal antitrust laws

> Qui Tam matters

Currently working on numerous qui tam matters that are under seal in multiple jurisdictions

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YEARS OF EXPERIENCE

> 21

PRACTICE AREAS

- > Antitrust
- > Insurance Fraud
- > Consumer Rights
- > Employment Discrimination

> Products Liability

BAR ADMISSIONS

- > Second, Third, Seventh, Eighth and Ninth Circuit Courts of Appeals
- > U.S. District Court, Northern, Central and Southern Districts of Illinois
- > District of Colorado

EDUCATION

> Loyola University Chicago School of Law, J.D., Editor of Loyola Law Journal

PARTNER

Elizabeth A. Fegan

"I have found working with you on this case one of the more interesting, challenging and, at some level, uplifting things that I have been able to do..." – Hon. Wayne Andersen (Ret.) at final approval of a nationwide sexual harassment settlement on behalf of 16,000 women.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Leads Hagens Berman's Chicago office
- > Practice focuses on complex commercial class-action cases in the areas of antitrust, consumer protection and product liability

RECENT SUCCESS

- > American Equity Senior Annuities Fraud (\$129 million settlement)
- > Midland Senior Annuities Fraud (\$79.5 million settlement)
- > Baby Products Antitrust Settlement (\$35 million settlement)
- > Pre-Filled Propane Tank Marketing And Sales Practices (\$35 million settlement);
- > Bayer Combination Aspirin Consumer Fraud (\$15 million settlement);
- > Aurora Dairy Organic Milk Consumer Fraud (\$7.5 million settlement);
- > "Thomas the Tank Engine" Toys Lead Paint Products Liability (\$30 million settlement of federal and state cases)

RECOGNITION

- > Illinois Super Lawyer, Super Lawyers Magazine (2016-17)
- > The National Trial Lawyers: Top 100 (2014-15)
- > Time, Treasure & Talent Award, St. Giles CCW (2014)
- > AAJ, Civil Rights Section, Outstanding Section Newsletter of the Year (2006)

EXPERIENCE

- > Partner, The Wexler Firm
- > Associate, Shefsky & Froelich Ltd.
 - Appointed Special Assistant Corporation Counsel on behalf of the City of Chicago, the Chicago Park District, and the Public Building Commission of Chicago
 - Appointed to the Special Master teams in *In re Waste Mgmt. Sec. Litig. (N.D. III.)* and *Wolens et al. v. American Airlines (Cir. Ct. Cook County, III.)*
- > Legal Writing Instructor, Loyola University Chicago School of Law

Elizabeth A. Fegan

PUBLICATIONS

- > "You Have Class! How to Identify Potential Class Actions in Your Everyday Practice," Keynote Speaker, West Suburban Bar Association (Sept. 2016)
- > At Sidebar column: "FBA Convention and Ohio Spotlight," The Federal Lawyer (August 2016)
- "An Opportunity Or Landmine: Promoting Gender Diversity From The Bench," The Federal Lawyer (pending pub. May 2016)
- > "Post-Certification Strategies," Class Action Litigation in America A National Symposium, American Bar Association (March 2016)
- > Articles Editor (2016-17), Proof Editor (2015-16), Editorial Board Committee, Federal Bar Association (appt. 2015-18)
- > Co-Chair, HarrisMartin's MDL Conference: Herbal Supplements Litigation (2015)
- Contributing Editor, 2013 Annual Review of Antitrust Law Developments (ABA 2014) and 2007 Annual Review of Antitrust Law Developments (ABA 2008)
- > Newsletter Editor, Civil Rights Section of the American Trial Lawyers Association (n/k/a American Association for Justice) (2005-06) and received an award for Outstanding Section Newsletter of the Year
- > "Home Rule Hits the Road in Illinois: American Telephone & Telegraph Company v. Village of Arlington Heights," Loyola Law Journal (1995)
- > Editor, Loyola University Chicago Law Journal (1994-95)

NOTABLE CASES

- > NCAA Student-Athlete Concussion Litigation
- > NCAA Student-Athlete Scholarship Cap Antitrust Litigation
- > Nationwide class action alleging sexual harassment on behalf of 16,000 current and former female employees of a commercial property brokerage firm. The settlement required changes to human resource policies and a streamlined claims process that provided the potential for individual awards up to \$150,000 per class member.
- > Multiple cases against annuities insurers for targeting seniors with deferred annuities that lock seniors' savings up for their lifetimes
- > Actiq Off-Label Marketing Fraud

PERSONAL INSIGHT

- > Beth is still "leaning in" with five kids while training for her tenth marathon.
- > Once interviewed Barry Sanders in the Detroit Lions locker room while working as a sports stringer at the Lansing State Journal.



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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Consumer Rights
- > Antitrust Litigation> Privacy Rights
- > Securities Litigation
- 0

BAR ADMISSIONS

- > California
- > Central District of California
- > Northern District of California
- > U.S. Court of Appeals for the Ninth Circuit

EDUCATION

- Santa Clara University School of Law, J.D., magna cum laude, 1994
- > University of Washington, B.A., Political Science, 1991

Jeff D. Friedman

Mr. Friedman is extensively involved in the firm's representation of government entities, successfully recovering hundreds of millions of dollars.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Specializing in class actions against some of the largest companies in the United States, Mr. Friedman litigates cases involving securities fraud, consumer protection and antitrust violations including litigation against technology companies and cutting-edge competition policy issues
- > Extensively involved in the firm's representation of government entities, successfully recovering hundreds of millions of dollars
- > Licensed to practice law in California and admitted in the Central and Northern Districts of Federal court and the U.S. Court of Appeals for the Ninth Circuit
- > Involved in firm's position as lead counsel on behalf of purchasers of millions of electronics products, including laptop computers and cell phones, against several multinational corporations alleged to have fixed the prices of lithium ion battery cells for more than a decade

RECOGNITION

> Northern District of California Super Lawyer, 2013, 2014

EXPERIENCE

- > General Counsel, public fiber-optic component company in Silicon Valley
- > Assistant U.S. Attorney, Criminal Division, Central District of California (Los Angeles)
- > Clerk for the Honorable Manuel L. Real, U.S. District Court Judge, Central District of California

NOTABLE CASES

- In re Electronic Books Antitrust Litig., No. 11-md-02293 (DLC) (S.D.N.Y.) A nationwide class of e-book consumers allege five of the largest book publishers in the United States and Apple conspired to raise the prices of e-books and restrain competition.
- > In re Optical Disk Drive Prods. Antitrust Litig., No. 3:10-md-2143 RS (N.D. Cal.)
 - An action on behalf of consumers in more than two dozen states against the manufacturers of optical disk drives. The plaintiffs allege defendants conspired to increase the price of ODDs that were sold to original equipment manufacturers. Defendants' conduct allegedly caused millions of consumer electronics products, such as computers, to be sold at illegally inflated prices.

> Pecover et al. v. Electronic Arts Inc., No. 3:08-cv-02820-CW (N.D. Cal.)

A nationwide certified class of consumers who bought interactive football video games. Plaintiffs allege Electronic Arts entered into a series of exclusive licenses with football intellectual property owners,

Jeff D. Friedman

such as the NFL, in order to lock-up the market. A \$27 million settlement in the case has been agreed to by the parties, but awaits approval by the court.

- San Francisco Health Plan v. McKesson Corp., No. 1:08-CV-10843-PBS (D. Mass.); State of Utah v. McKesson Corp., No. CV 10-04743 SI (N.D. Cal.); The Commonwealth of Virginia v. McKesson Corp. et al., No. CV-11-02782 SI (N.D. Cal.); State of Oregon v. McKesson Corp., No. CV-11-5384-SI (N.D. Cal.)
- > In re eBay Seller Antitrust Litigation, action on behalf of millions of eBay sellers, claiming eBay monopolized the online auction market and attempted to monopolize the person-to-persons payment systems market (Paypal)
- > Dell Inc. Bait-And-Switch Sales Litigation, negotiated multimillion dollar settlement on behalf of nearly one million consumers

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YEARS OF EXPERIENCE

10

PRACTICE AREAS

- > Employment Law
- > Securities Litigation
- > Antitrust Litigation
- > Investor Protection> Consumer Protection
- / Consumer Protection

BAR ADMISSIONS

> California

EDUCATION

- Anderson Graduate School of Management at UCLA, M.B.A., with Honors, 2002
- > Harvard Law School, J.D., with honors, 1994
- > University of California at Los Angeles, B.A., Philosophy, summa cum laude, 1990

Partner Lee Gordon

Mr. Gordon's casework reflects his broad experience in diverse practice areas and his effectiveness playing a lead role in class-action litigation.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Practice focuses on on complex class actions including securities litigation, unfair competition and deceptive business practice cases against investment companies, antitrust litigation, consumer class actions against product manufacturers and retailers, and employee protection class actions
- Experience includes litigation in a number of cases on behalf of employees and consumers resulting in multimillion-dollar settlements, including cases against Costco Wholesale Corporation, Solvay Pharmaceuticals, Inc., Apple, Inc. and Citibank, N.A.
- Represents class members who invested in funds managed by Tremont Group Holdings, Inc., funds that were allegedly decimated as a result of the now-infamous Madoff Ponzi scheme. Mr. Gordon also represents investors against TD Ameritrade and The Reserve for various securities violations and breaches of fiduciary duty.

EXPERIENCE

- Prior to joining Hagens Berman in 2005, Mr. Gordon's practice covered a broad spectrum of complex litigation matters. He represented and advised clients in antitrust litigation, employment litigation, class actions, breach of contract and breach of warranty litigation, intellectual property cases, real estate and land use disputes, and matters involving challenges to government regulations.
- > Early work included race discrimination, wrongful termination, disability discrimination and compensation disputes. His class action work included complex securities and unfair business practices litigation involving multimillion-dollar claims against major public financial institutions.
- > Associate, Howard Rice Nemerovski Canady Falk & Rabkin
- > Associate, Gibson, Dunn & Crutcher

NOTABLE CASES

- > Tremont Group Holdings, Inc. Litigation Representing investors whose funds were allegedly decimated in the Madoff Ponzi scheme
- Solvay Pharmaceuticals, Inc., Litigation Represented consumers against a drug company that allegedly wrongly marketed a hormone drug as "FDA-approved"
- > Costco Wholesale Corporation Litigation Represented a certified class of California employees who claim they were wrongly denied overtime compensation, breaks and other benefits
- Schneider National Carriers, Inc., Litigation Representing two certified classes of California employees (truck drivers and mechanics) in separate cases seeking to address alleged unfair pay schemes

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YEARS OF EXPERIENCE

>9

PRACTICE AREAS

- > Consumer Rights
- > RICO
- > Antitrust

BAR ADMISSIONS

- > Massachusetts
- > U.S. District Court, District of Massachusetts
- > First Circuit Court of Appeals

EDUCATION

- > Boston College Law School, J.D.
- > Dartmouth College, cum laude, B.A.

Kristen A. Johnson

Public Justice nominated Ms. Johnson and the rest of the Neurontin trial team for Trial Lawyer of the Year for securing a \$142 million verdict against Pfizer for suppressing and manipulating results of scientific studies.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Practice focuses combating waste, fraud and abuse in the healthcare industry
- Personally appointed alternate lead counsel in the In re New England Compounding Pharmacy Litigation Multidistrict Litigation (MDL 2419). During the nascent stages of the MDL, Ms. Johnson was appointed liaison counsel to speak for the hundreds of victims who contracted fungal meningitis or suffered other serious health problems as a result of receiving contaminated products produced by NECC.
- > Actively involved in In re Nexium Antitrust Litigation (D. Mass., MDL No. 2409); In re Loestrin Antitrust Litigation (D.R.I., MDL No. 2472); and In re Celebrex Antitrust Litigation, (E.D. Va. 14-cv-00361).

RECENT SUCCESS

- > Lead counsel for plaintiffs who contracted fungal infections from contaminated steroids compounded by New England Compounding Center (\$200+ million settlement)
- > One of four attorneys who presented and cross examined witnesses for the plaintiffs during the 2014 Nexium Antitrust trial
- \$142 million civil RICO verdict against Pfizer for suppressing and manipulating results of scientific studies
- Instrumental in the recent Neurontin marketing (\$350 million), Prograf antitrust (\$98 million), Flonase antitrust (\$150 million) and Wellbutrin XL antitrust (\$37.5 million, partial) settlements

RECOGNITION

- > In 2014 and 2015, the National Law Journal honored Ms. Johnson as one of Boston's Rising Stars, one of 40 outstanding lawyers under 40.
- In 2011, Public Justice nominated Ms. Johnson and the rest of the Neurontin trial team for Trial Lawyer of the Year for their work in securing a \$142 million verdict against Pfizer for suppressing and manipulating the results of scientific studies that showed Neurontin did not work to treat the off-label indications Pfizer was heavily promoting.

LEGAL ACTIVITIES

- > Public Justice, Class Action Preservation Committee
- > American Association for Justice

partner Kristen A. Johnson

NOTABLE CASES

- > Neurontin class action marketing settlement (\$325 million)
- > In re Prograf Antitrust Litigation (\$98 million)
- > Pfizer Neurontin RICO Litigation (\$142 million jury verdict)
- > In re Flonase Antitrust Litigation (\$150 million settlement)
- > In re Nexium Antitrust Litigation (trial October 2014)
- > In re Prograf Antitrust Litigation (trial fall 2014)

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YEARS OF EXPERIENCE

PRACTICE AREAS
> Securities Litigation

BAR ADMISSIONS

- > State of California
- > State of Illinois
- > State of Florida

COURT ADMISSIONS

- > Supreme Court of California
- > Supreme Court of Florida
- > Supreme Court of Illinois
- > U.S. District Court for the Northern District of California
- > U.S. District Court for the Northern District of Illinois
- > U.S. District Court of Colorado
- > U.S. Court of Appeals, Ninth Circuit

EDUCATION

- > University of Miami, J.D., 1977
- > University of Miami, B.A., 1974

Reed R. Kathrein

Mr. Kathrein represents institutional, government and individual investors in securities fraud, and corporate governance cases.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Regular public speaker on securities, class action and consumer law issues

CURRENT ROLE

> Super Lawyer, Super Lawyers Magazine, 2007 - 2015

EXPERIENCE

- > Litigated over 100 securities fraud class actions
- > Worked behind the scenes in shaping the Private Securities Litigation Reform Act, the Securities Litigation Uniform Standards Act and the Sarbanes-Oxley Act
- > Lawyer Representative, Ninth Circuit Court of Appeals
- > Lawyer Representative, U.S. District Court for the Northern District of California, 2008-2011
- > Chaired the Magistrate Judge Merit Selection Panel, U.S. District Court, Northern District of California, 2006-2008
- > Co-chaired the Securities Rules Advisory Committee, U.S. District Court, Northern District of California, 2004-2006

LEGAL ACTIVITIES

- > Member, National Association of Public Pension Attorneys (NAPPA)
- > Member and Speaker, National Conference on Public Employee Retirement Systems (NCPERS)
- > Member, Council of Institutional Investors (CII)
- > Member, State Association of County Retirement Systems (SACRS)
- > Member, National Council on Teacher Retirement (NCTR)
- > Member, California Association of Public Retirement Systems (CALAPRS)
- > Member, Michigan Association of Public Employee Retirement Systems (MAPERS)
- > Member, Illinois Public Pension Fund (IPPFA)
- > Member, Standing Committee on Professional Conduct, U.S. District Court, Northern District of California (Term expires 2017)
- > Expedited Trial Rules Committee, U.S. District Court, Northern District of California, 2010-2012
- > Lawyer Representative to the Ninth Circuit Court of Appeals, U.S. District Court, Northern District of California, 2008-2011
- > Chair/ Member, Magistrate Judge Merit Selection Panel, U.S. District Court, Northern District of California, 2006-2008

Reed R. Kathrein

PUBLICATIONS

- > "A Look at Recent Demographics and Other Statistics in Securities Fraud Class Actions," The NAPPA Report, October 2016
- > "Post-Morrison: The Global Journey Towards Asset Recovery," Reed R. Kathrein, Peter E. Borkon, Nick S. Singer, contributing members, NAPPA Morrison Working Group, June 2016
- > "Interview with Bernie Madoff," Hagens Berman, HBSS Securities News, Fall 2015
- > "Is Your Fund Prepared for Halliburton?," March 2014
- "O Securities Fraud, Where Art Thou?, Enter Robocop," Hagens Berman, HBSS Securities News, November 2013
- > "Professor Coffee to SEC: Hire Plaintiffs Bar!," Hagens Berman, HBSS Securities News, May 2013
- "Living in a Post-Morrison World: How to Protect Your Assets Against Securities Fraud," Reed R. Kathrein, Peter E. Borkon, contributing members, NAPPA Morrison Working Group, 2012
- SEC Action Necessary, But Not Sufficient to Protect Investors," Hagens Berman, HBSS Securities News, November 2012
- > "Are You Watching Your Private Equity Valuations?" Hagens Berman, HBSS Securities News, May 2012
- "What Do Trustees Need to Know When Investing In Foreign Equities?," Hagens Berman, HBSS Securities News, November 2011

PRESENTATIONS

- > "Occupy Wall Street through Reform of the Securities Law," NCPERS, Legislative Conference, February 2012
- > "Legal Issues Facing Public Pensions," Opal, Public Funds Summit, January 2012
- > "Protection vs. Interference What the New Federal Regulations Mean to Institutional Investors," NCPERS, Annual Conference, May 2011"The Immediate Need for Congress to Act on Investor Friendly Legislation," NCPERS, Annual Conference, May 2010
- > "Investor Friendly Legislation in Congress," NCPERS, Legislative Conference, February 2010

NOTABLE CASES

- Litigated over 100 securities fraud class actions including cases against 3Com, Adaptive Broadband, Abbott Laboratories, Bank of America, Capital Consultants, CBT, Ceridian, Commtouch, Covad, CVXT, ESS, Harmonics, Intel, Leasing Solutions, Nash Finch, Northpoint, Oppenheimer, Oracle, Pemstar, Retek, Schwab Yield Plus Fund, Secure Computing, Sun Microsystems, Tremont (Bernard Madoff), Titan, Verifone, Whitehall, and Xoma
- Litigated many consumer, employment and privacy law cases including AT&T Wiretapping Litigation, Costco Employment, Solvay Consumer, Google/Yahoo Internet Gambling, Vonage Spam, Apple Nano Consumer, Ebay Consumer, LA Cellular Consumer, AOL Consumer, Tenet Consumer and Napster Consumer

Reed R. Kathrein

PERSONAL INSIGHT

Reed is a recovering rock-and-roll drummer and banjo ukulele player. His rock band, the Stowaways, was voted 4th best in the State of Illinois out of 300 bands in the Jaycees Battle of the Bands. Reed's mother made his band costume of blue jean bell bottoms, sailor shirts and hats. The next year everyone wore blue jean bell bottoms to Woodstock. His prized possession is a 30lb Jeff Ocheltree snare drum made by Led Zeppelin John Bonham's drum technician. The rest of his kit is patterned after Dave Matthews Band's drummer, Carter Beauford. In his spare time, Reed works on playing Stairway to Heaven (drums) in his garage or Somewhere Over the Rainbow (banjo ukulele) in the High Sierra mountains.



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YEARS OF EXPERIENCE

> 10

PRACTICE AREAS

- > Securities Litigation
- > Antitrust Litigation
- > Pharmaceutical Fraud

CLERKSHIPS

- > Hon. Paul E. Plunkett, Northern District of Illinois
- > Hon. Maria Valdez, Northern District of Illinois

BAR ADMISSIONS

- > Illinois
- > U.S. Court of Appeals, Seventh Circuit
- > U.S. District Court, Northern District of Illinois
- > U.S. District Court, Central District of Illinois
- > U.S. District Court, Southern District of Illinois

EDUCATION

- John Marshall Law School, J.D., cum laude, 2005
- Loyola University Chicago,
 B.B.A., with Honors, 2002

Partner Daniel J. Kurowski

Recognized as a 2015 "Rising Star" in Illinois by Super Lawyers

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Mr. Kurowski has litigated many aspects of cases throughout the country, often in consolidated multidistrict litigation proceedings. His current work with the firm includes a variety of complex cases including:
- Contesting a prominent financial company's deferred annuity sales practices in RICO litigation, including practices negatively impacting senior citizens.
- Representing student-athletes in both individual personal injury and class-action litigation pertaining to concussions/traumatic brain injuries suffered during sporting activities, including in In Re National Collegiate Athletic Association Student-Athlete Concussion Injury Litigation (N.D. III.).
- Representing student-athletes in antitrust litigation regarding the NCAA's Division I football scholarship policies.
- Suing on behalf of a putative class of third-party payors of prescription cancer pain drugs allegedly marketed and sold for non-cancer/off-label uses.
- Representing retail purchasers with consumer fraud claims against dietary supplement sellers and manufacturers.

RECENT SUCCESS

- > In re Pre-Filled Propane Sales & Marketing Practices Litigation (W.D. Mo.) (\$35 million in settlements involving multiple defendants)
- > In re Bayer Combination Aspirin Sales & Marketing Practices Litigation (E.D.N.Y.) (\$15 million settlement)
- > In re Aurora Dairy Organic Milk Marketing & Sales Practices Litigation (E.D. Mo.) (\$7.5 million settlement)

RECOGNITION

> Illinois Rising Star, Super Lawyers Magazine, 2015, 2016

EXPERIENCE

- > Federal judicial law clerk, Hon. Paul E. Plunkett and Hon. Maria Valdez
- > Intern, U.S. Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity, the U.S. Attorney's Office for the Northern District of Illinois and with Hon. Ronald A. Guzman and his staff
- > During law school, Mr. Kurowski received multiple academic scholarships, served as a staff member and Lead Articles Editor for The John Marshall Law Review, and received an award for an appellate brief submitted in a national moot court competition

LEGAL ACTIVITIES

- > Seventh Circuit Electronic Discovery Pilot Program Committee
- > Member of American Association for Justice, Illinois State Bar Association, Chicago Bar Association

PARTNER Daniel J. Kurowski

NOTABLE CASES

- > Aurora Dairy Corporation Organic Milk Marketing & Sales Practices Litigation (E.D. Mo.)
- > Bayer Corp. Combination Aspirin Product Marketing & Sales Practices Litigation (E.D.N.Y.)
- > Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation (W.D. Mo.)
- > Pre-Filled Propane Tank Marketing & Sales Practices Litigation (W.D. Mo.)
- > RC2 Corp. Toy Lead Paint Products Liability Litigation (N.D. III.)

PERSONAL INSIGHT

Dan enjoys staying active by competing in cyclocross races and equally intense races chasing after his two small children. Before called to practice law, Dan's work included delivering flowers, selling architecture river cruise tickets and retailing compact discs... back when people still bought CDs.

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YEARS OF EXPERIENCE

> 17

PRACTICE AREAS

- > Consumer Rights
- > False Claims Act/*Qui Tam*
- Government Fraud
 Corporate Fraud
- Corporate i radu
 Doto Brooch /Idopti
- Data Breach/Identity Theft and Privacy

BAR ADMISSIONS

- > Washington
- > California
- > District of Columbia
- > U.S. District Court for the District of Columbia
- > U.S. District Court for the Northern District of California
- > U.S. District Court for the Southern District of California
- > U.S. District Court for the Central District of California
- > U.S. District Court for the Western District of Washington
- > Ninth Circuit Court of Appeals

partner Thomas E. Loeser

Mr. Loeser obtained judgments in cases that have returned tens of millions of dollars to hundreds of thousands of consumers and more than \$100 million to the government.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on class actions, False Claims Act and other whistleblower cases, consumer protection and data breach/identity-theft/privacy cases
- > Successfully litigated class-action lawsuits against mortgage lenders, appraisal management companies, automotive manufacturers, national banks, home builders, hospitals, title insurers, technology companies and data processors
- > Currently prosecuting consumer protection class-action cases against banks, automobile manufacturers, lenders, loan servicing companies, technology companies, national retailers, payment processors and False Claims Act whistleblower suits now under seal
- > Obtained judgments in cases that have returned tens of millions of dollars to hundreds of thousands of consumers and more than \$100 million to the government

RECOGNITION

> Martindale-Hubbell® AV Preeminent rating, 2015

EXPERIENCE

- > Experience trying cases in federal and state courts in San Francisco, Los Angeles and Seattle
- > Served as lead or co-lead counsel in 12 federal jury trials and has presented more than a dozen cases to the Ninth Circuit Court of Appeals
- > As a federal prosecutor in Los Angeles, Mr. Loeser was a member of the Cyber and Intellectual Property Crimes Section and regularly appeared in the Central District trial courts and the Ninth Circuit Court of Appeals
- > Assistant U.S. Attorney, U.S. Department of Justice
- > Wilson Sonsini Goodrich & Rosati

NOTABLE CASES

- > Volkswagen Emissions Defect Litigation
- > Shea Homes Construction Defect Litigation
- > Meracord/Noteworld Debt Settlement Litigation
- > Defective RV Refrigerators Litigation
- > New Jersey Medicare Outlier Litigation
- > Center for Diagnostic Imaging Qui Tam Litigation
- > Countrywide FHA Fraud Qui Tam Litigation

partner Thomas E. Loeser

EDUCATION

- > Duke University School of Law, J.D., magna cum Laude, Order of the Coif, Articles Editor Law and Contemporary Problems, 1999
- > University of Washington, M.B.A., cum laude, Beta Gamma Sigma, 1994
- Middlebury College, B.A.,
 Physics with Minor in Italian,
 1988

> Chicago Title Insurance Co. Litigation

- > KB Homes Captive Escrow Litigation
- > Aurora Loan Modification Litigation
- > Wells Fargo HAMP Modification Litigation
- > JPMorgan Chase Force-Placed Flood Insurance Litigation
- > Wells Fargo Force-Placed Insurance Litigation
- > Target Data Breach Litigation
- > Cornerstone Advisors Derivative Litigation
- > Honda Civic Hybrid Litigation
- > Hyundai MPG Litigation

LANGUAGES

> French> Italian

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PRACTICE AREAS

- > Complex Commercial Litigation
- > Health Care &
- Pharmaceuticals Litigation
- > Intellectual Property Litigation
- > Privacy Litigation
- > Antitrust Litigation
- > Securities Litigation
- > Qui Tam Litigation

BAR ADMISSIONS

- > Washington
- > Western District of Washington
- > Eastern District of Washington
- > U.S. Court of Appeals for the Ninth Circuit

EDUCATION

- Gonzaga University, B.A.,
 English Literature; Arnold
 Scholar
- > University of Washington School of Law, J.D.

Robert F. Lopez

Mr. Lopez continues practice on qui tam matters at the firm, representing whistleblowers in cases involving violations of federal and state laws that prohibit the making of false claims for government payments.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- Health care and pharmaceuticals litigation

- > Offers a broad range of legal experience in the fields of:
 - Complex commercial litigation

- Product defect litigation

- False Claims Act litigation

- Privacy litigation
 Securities litigation
 - Antitrust litigation
 - Creditor-debtor litigation
- Intellectual property litigation
- > Member of firm's In re Carrier IQ, Inc. Consumer Privacy Litigation team
- Member of the firm's team representing the plaintiffs and proposed class in *Free Range Content Inc.* v. *Google Inc.*, an class-action case based on allegations that Google unlawfully denies payments to thousands of website owners and operators who place ads on their sites sold through Google AdWords
- > Continues practice on *qui tam* matters at the firm, representing whistleblowers in cases involving violations of federal and state laws that prohibit the making of false claims for government payments

EXPERIENCE

- > Experienced in prosecuting and defending appeals in the federal and state courts of appeal; representing institutions and consumers in nationwide class-action lawsuits, including in the federal multidistrict litigation setting; advising clients in non-litigation settings with respect to trademark, trade-name, copyright and Internet-communications law
- > Member of firm's team representing one of the relators in the 2012 settlement with Amgen Inc., in which the company agreed to pay \$612 million to the U.S. and various state governments in order to resolve claims that it caused false claims to be submitted to Medicare, Medicaid and other government insurance programs
- > Member of the firm's team that prosecuted *In re Charles Schwab Corp. Securities Litigation*
- > Experienced in class-action litigation against DaimlerChrysler Corporation relating to product defects in its Neon automobiles, nationwide class-action cases against Trex Company, Inc. and Fiber Composites, Inc.
- > Founding Member and Partner, Socius Law Group PLLC
- > Partner, Betts, Patterson & Mines, P.S.

partner Robert F. Lopez

- > In re Pharmaceutical Industry Average Wholesale Price Litigation
- > Amgen Inc. Qui Tam Litigation
- > In re Metropolitan Securities Litigation
- > In re Charles Schwab Corp. Securities Litigation
- > In re Carrier IQ, Inc. Consumer Privacy Litigation

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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Civil RICO
- Consumer Rights
- > State False Claims

BAR ADMISSIONS

- > Washington
- > U.S. District Court, Western District of Washington
- > U.S. District Court, Eastern District of Washington
- > Ninth Circuit Court of Appeals

EDUCATION

- > University of Washington, J.D., 2001
- > Universität Freiburg, PhD,
 philosophy, magna cum laude,
 1993

Barbara Mahoney

Ms. Mahoney received her doctorate in philosophy from the Universität Freiburg (Germany), where she graduated magna cum laude.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Focused primarily on national class actions and pharmaceutical litigation
- Extensively involved in several lawsuits against McKesson Corporation relating to allegations that the company engaged in a scheme that raised the prices of more than 400 brand-name prescription drugs. That litigation has resulted in two separate national class-action settlements for \$350 million and \$82 million and several settlements by individual Medicaid agencies. Ms. Mahoney is currently involved in related litigation on behalf of the commonwealth of Virginia and the state of Arizona.

RECOGNITION

> Rising Star, Washington Law & Politics, 2005

EXPERIENCE

- > Worked in several areas of commercial litigation, including unlawful competition, antitrust, securities, trademark, CERCLA, RICO, FLSA as well as federal aviation and maritime law
- > Associate, Calfo Harrigan Leyh & Eakes LLP (formerly Danielson Harrigan Leyh & Tollefson)
- > Law Clerk, Justice Sanders, Washington Supreme Court
- > Law Clerk, Judge Saundra Brown Armstrong, U.S. District Court, N.D. California

LEGAL ACTIVITIES

- > Downtown Neighborhood Legal Clinic
- > Q Law
- > Cooperating Attorney with American Civil Liberties Union of Washington

NOTABLE CASES

- > New England Carpenters v. First DataBank (\$350 million class-action settlement)
- > Douglas County v. McKesson (\$82 million class-action settlement)

LANGUAGES

- > Fluent in German
- > Reads Swedish and French

PERSONAL INSIGHT

Ms. Mahoney lives in West Seattle with her partner and is very active in local athletic organizations. She is a former board member of Rain City Soccer, where she also organized a summer-long program on basic skills. She is also active in Seattle Frontrunners, a masters track club. She enjoys reading, running, soccer, and studying foreign languages. Ms. Mahoney is fluent in German and reads Swedish and French.

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YEARS OF EXPERIENCE

7 24

PRACTICE AREAS

- > Securities Litigation
- > Consumer Rights
- > Antitrust Litigation
- > Insurance > Products
- /110000015

BAR ADMISSIONS

- > Supreme Court of Washington
- > U.S. District Court, Western District of Washington
- > U.S. District Court, District of Colorado
- > Ninth Circuit U.S. Court of Appeals

EDUCATION

- Indiana University, B.S.,
 Finance, Highest Distinction,
 1988
- University of Oregon School of Law, J.D., Order of the Coif (top 10%), Associate Editor of the Law Review, 1992

PARTNER

Sean R. Matt

Leads the firm's innovation in organizing and prosecuting individual class cases across many states involving the same defendants and similar factual and legal issues, an approach that continues to be a key factor in the firm's success

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP, since its founding in 1993
- Practice focuses on multi-state and nationwide class actions and complex commercial litigation encompassing securities and finance, consumer, antitrust, insurance and products
- > Diverse experience in most of the firm's practice areas, involving appearances in state and federal courts across the country at both the trial and appellate levels
- > Key member of the firm's securities litigation team, most recently co-leading the prosecution and settlement of the *In re Charles Schwab Securities Litigation*, the *In re Oppenheimer Champion Income Fund Securities Class Actions* and the *Oppenheimer Core Bond Fund Class Action Litigation*
- Key member of the firm's pharmaceutical litigation team that confronts unfair and deceptive pricing and marketing practices in the drug and dietary supplement industries including Average Wholesale Price Litigation, the First Databank/McKesson Pricing Fraud Litigation and the Enzyte Litigation
- > Key member of the firm's automobile defect litigation team

RECOGNITION

> In 2014, Public Justice nominated Mr. Matt and the *In re Toyota Motor Corp. Sudden, Unintended Acceleration* team for their work in securing a \$1.6 billion settlement of car owners.

PUBLICATIONS

Providing a Model Responsive to the Needs of Small Businesses at Formation: A Focus on Ex Ante Flexibility and Predictability, 71 Oregon Law Review 631, 1992

- > In re Charles Schwab Securities Litigation (\$235 million settlement)
- > In re Oppenheimer Champion Income Fund Securities Fraud Class Actions (\$52.5 million proposed settlement)
- > Oppenheimer Core Bond Fund Class Action Litigation (\$47.5 million settlement)
- > Morrison Knudsen and Costco Wholesale Corp. Securities Litigation
- > In re Pharmaceutical Industry Average Wholesale Price Litigation (\$338 million settlement)
- > In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation
- > In re Checking Account Overdraft cases pending against many of the country's largest banks
- > Washington State Ferry Litigation, which resulted in one of the most favorable settlements in class litigation in the history of the state of Washington

PARTNER Sean R. Matt

- > Microsoft Consumer Antitrust cases
- > State Attorneys General *Tobacco Litigation*, assisted with client liaison responsibilities, working closely with assistant attorneys general in Oregon, Ohio, Arizona, Alaska and New York, as well as assisting in all litigation matters

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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Personal Injury
- > Civil Rights
- > Insurance Bad Faith
- > Public Records Act

BAR ADMISSIONS

- > U.S. District Court for the Western District of Washington
- > U.S. District Court for the Eastern District of Washington
- > Ninth Circuit Court of Appeals
- > Supreme Court of Washington

EDUCATION

> Seattle University School of Law, J.D., cum laude, 2002

Martin D. McLean

Mr. McLean is a true trial attorney having tried more than 20 cases to verdict in various state and federal courts.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Represents individuals who have suffered catastrophic personal injury or loss
- > Clientele includes a wide range of individuals, including children who have suffered harm while in state care, elderly adults who have experienced abuse or neglect in nursing homes and individuals harmed by medical negligence.
- > Mr. McLean has been at the forefront of litigation involving the Washington Public Records Act.

RECENT SUCCESS

> During his tenure with Hagens Berman's personal injury team, Mr. McLean has contributed to numerous lawsuits resulting in multi-million dollar recoveries on behalf of the firm's clients.

EXPERIENCE

> Mr. McLean is a seasoned trial attorney, with extensive experience in all phases of litigation.

NOTABLE CASES

- > Marx v. DSHS, \$3 million judgment on behalf of developmentally-disabled patient sexually abused at state-run hospital
- > Tamas v. State of Washington, \$525,000 judgment on behalf of three children seeking publicrecords from state agency
- > Wright v. DSHS, \$2,850,000 judgment against the state of Washington for negligent child abuse investigation
- > Rudolph v. DSHS, \$900,000 judgement on behalf of family of a vulnerable adult severely neglected in state-licensed adult family home

PERSONAL INSIGHT

Mr. McLean spent a year living in Italy studying art, history, Italian and wine-drinking. When not practicing law, Mr. McLean enjoys his new favorite hobby: raising his young son with his wife.

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YEARS OF EXPERIENCE

PRACTICE AREAS

> Personal Injury Litigation> Civil Rights

BAR ADMISSIONS

- > Washington
- > U.S. Supreme Court
- > U.S. Court of Appeals, Ninth Circuit

EDUCATION

- > George Washington University School of Law, J.D., 1993
- > University of Washington, B.A., 1990

PARTNER David P. Moody

Mr. Moody has successfully secured many multi-million dollar recoveries on behalf of vulnerable citizens who have been abused, neglected or exploited.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

> A trial attorney with a passion for representing children, the disabled, elderly and incapacitated citizens

NOTABLE CASES

- > Mr. Moody has secured many multi-million dollar recoveries on behalf of vulnerable citizens who have been abused, neglected or exploited, including:
 - Largest jury verdict ever upheld against the State of Washington, DSHS (\$17.8 million)
 - Largest single-plaintiff settlement against the State of Washington, DSHS (\$8.8 million)
 - Largest recovery on behalf of three foster children (\$7.3 million)
 - Largest single-plaintiff settlement on behalf of a child in Snohomish County, Washington (\$5 million)
 - Largest judgment on behalf of an incapacitated child in Spokane County, Washington (\$4 million)
 - Judgment for a disabled woman in Santa Clara County, California (\$4 million)
 - Largest judgment ever obtained against Eastern State Hospital (\$3 million)
 - Largest judgment ever obtained against the State of Washington, Child Study and Treatment Center (\$3 million)
 - Judgment for a boy neglected and abused in Snohomish County, Washington (\$2.85 million)
 - Judgment for a girl neglected and abused in Pierce County, Washington (\$2.85 million)
 - Settlement on behalf of brain-injured infant abused in day care setting (\$2.84 million)
 - Largest single-plaintiff jury verdict on behalf of an incapacitated adult in Kitsap County, Washington (\$2.6 million)
 - Judgment in the amount of \$2.5 million for a client abused at Eastern State Hospital
 - Largest single-plaintiff settlement on behalf of a developmentally disabled male in eastern Washington (\$2.25 million)
 - Several additional settlements in excess of \$1 million

PERSONAL INSIGHT

David is proud to be a native Washingtonian and enjoys strong ties to the eastern side of the state. David's grandfather Jack Edward Moody was born and raised in Dayton, Washington, and David's greatgrandfather Edward Maple Moody was the Sheriff of Columbia County, Washington. David's maternal grandmother, Eva Armstrong, was one of the first female graduates of Whitman College in Walla Walla, Washington.

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YEARS OF EXPERIENCE

> 31

PRACTICE AREAS

- > Pharmaceuticals and Medical Devices
- > Antitrust Litigation
- > Consumer Rights
- > Securities Litigation

BAR ADMISSIONS

- > Massachusetts
- > New York

EDUCATION

- New York University School of Law, J.D., 1985; Senior Research Editor, Annual Survey of American Law; Recipient, Philip Cohen award for greatest contribution by an editor to Annual Survey of American Law
- > University of Pennsylvania,
 B.A., English, magna cum laude, 1980

PARTNER

David S. Nalven

Extensive experience in prosecution of antitrust, fraudulent marketing and unfair pricing claims against manufacturers of pharmaceutical products and medical devices, representing prescription drug wholesalers and retailers, health insurers and consumers in these matters

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on prosecution of federal and multi-state class actions involving the pharmaceutical and medical device industries
- > Served in leadership roles in nationwide antitrust class actions against the manufacturers of Ovcon 35, OxyContin, Tricor, Wellbutrin XL, Toprol XL, Norvir, Doryx, Prograf, Nexium and others
- > Prosecuted fraudulent marketing class actions against the manufacturers of Serostim, Nexium, Actimmune and Zyprexa, as well as substantial matters against medical device manufacturers DePuy Spine, Inc. and Becton Dickinson
- > Worked extensively on the nationwide Average Wholesale Price Litigation and in the representation of the state of Connecticut in multiple prescription drug pricing matters

EXPERIENCE

- > Chief of Business and Labor Protection Bureau, Massachusetts Attorney General's Office, Commonwealth of Massachusetts, 1999-2004
- > Partner, Prince, Lobel & Tye, LLP, Boston, MA, 1991-1999
- Private practice representing plaintiffs and defendants in civil and criminal business litigation, New York and Massachusetts, 1986-1991
- > Clerk to John R. Gibson, U.S. Court of Appeals for the Eighth Circuit, 1985-1986

- > Average Wholesale Price Litigation
- > Tricor Antitrust Litigation
- > Wellbutrin XL Antitrust Litigation
- > DePuy Spine Artificial Disc Litigation



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YEARS OF EXPERIENCE

1 29

PRACTICE AREAS

- > Antitrust Litigation
- > Consumer Rights
- > Tax Law
- > Securities Litigation
- > Pharmaceutical Fraud

BAR ADMISSIONS

- > Washington
- > Arizona
- > U.S. Court of Appeals, Ninth Circuit

EDUCATION

> University of Washington,
 B.A., Political Science, French
 Language and Literature, 1987

> Seattle University School of Law, J.D., cum laude, 1993

Christopher A. O'Hara

Plays key role in working with notice and claims administrators on all the firm's class settlements and class notice programs

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on antitrust, consumer, tax and securities class actions
- > Serves as plaintiffs' counsel in Hotel Occupancy Tax litigation against major online travel companies in various jurisdictions across the country
- > Active member of firm's Microsoft defense team negotiating claims administration policy and processing rules in twenty consumer and antitrust class-action state settlements around the country
- > Key role in working with claims administrators on all class settlements and class notice programs

RECENT SUCCESS

- > Worked on related litigation against Expedia on behalf of a nationwide class of consumers who purchased hotel reservations and paid excessive "taxes and fees" charges. That case resulted in summary judgment in plaintiffs' favor and an eventual settlement for cash and credits totaling \$134 million. Mr. O'Hara also played a leading role for the firm on the \$235 million settlement of *In re Charles Schwab Securities Litigation* and the \$1.6 billion settlement of *In re Toyota Motor Corp. Unintended* Acceleration Marketing, Sales Practices and Products Liability Litigation.
- > Mr. O'Hara deposed more than a dozen of Big Tobacco's expert witnesses, research scientists and marketing executives for the tobacco litigation, focusing predominantly on the state of Arizona case. Coordinated Arizona's national and local expert witnesses, while contributing to all aspects of discovery and motion practice. Mr. O'Hara played a leading role in the firm's successful defense of the state of Arizona against claims brought by several Arizona counties in the aftermath of the state's tobacco litigation.

RECOGNITION

> Rising Star, Washington Law and Politics, 2003

EXPERIENCE

- > Crowell & Moring, Paralegal, 1988-1990
- > Cozen & O'Connor, Associate, 1993-1997

NOTABLE CASES

- > Tobacco Litigation (\$206 billion multi-state settlement)
- > Expedia Litigation (\$134 million settlement)
- > Charles Schwab Yieldplus Funds Litigation (\$235 million settlement)
- > Toyota Unintended Acceleration Litigation (\$1.6 billion settlement)
- > Microsoft Antitrust Litigation

LANGUAGES

> French



Shana E. Scarlett

Northern California Super Lawyer, 2013 & 2014

CONTACT

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YEARS OF EXPERIENCE

> 15

PRACTICE AREAS

- > Antitrust Litigation
- Consumer Protection

> Securities Litigation

- BAR ADMISSIONS
- > California
- > U.S. District Court for the Northern District of California
- > U.S. District Court for the Southern District of California
- > U.S. District Court for the Eastern District of California
- > U.S. District Court for the Central District of California
- > U.S. Court of Appeals, Second Circuit
- > U.S. Court of Appeals, Ninth Circuit
- > U.S. Court of Appeals, Federal Circuit

EDUCATION

- > Stanford Law School, J.D.
- > University of British Columbia, B.A.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice is devoted entirely to representing plaintiffs in complex litigation, and primarily in the areas of antitrust and unfair competition
- > One of the team of litigators representing indirect purchaser plaintiffs in the *In re Optical Disk Drive Antitrust Litigation*, alleging a price-fixing conspiracy to stabilize the prices of optical disk drives throughout the United States, in violation of federal and state antitrust laws
- > One of the team of co-lead counsel representing indirect purchaser plaintiffs in the *In re Lithium Ion Batteries Antitrust Litigation*
- > Represents a class of consumers in the *In re Electronic Books Antitrust Litigation*, pending in the Southern District of New York, where attorneys from Hagens Berman Sobol Shapiro have worked closely with numerous State Attorneys General in representing the rights of consumers

RECOGNITION

- > Northern District of California Super Lawyer, 2013, 2014
- > Rising Star Award for Northern California, Super Lawyers, 2009, 2010, 2011

EXPERIENCE

- > Extensive experience representing shareholders in securities matters throughout the country
- Represented investors against defendants in a variety of industries, such as pharmaceutical manufacturers, (In re Impax Sec. Litig., In re CV Therapeutics, Inc. Sec. Litig., In re Alkermes Sec. Litig.), Internet companies (including In re Verisign, Inc. and In re Northpoint Communications Group, Inc. Sec. Litig.) and other manufactured products (Ryan v. Flowserve Corp.)

LEGAL ACTIVITIES

> Serves on executive committee of the Antitrust Section of the Bar Association of San Francisco

- > In re Optical Disk Drive Antitrust Litigation, MDL No. 2143
- > In re Electronic Books Antitrust Litigation, MDL No. 2293
- > Pecover v. Electronic Arts, Inc., MDL No. 2420

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YEARS OF EXPERIENCE

PRACTICE AREAS

Consumer Rights

BAR ADMISSIONS

- > California State Bar Association
- > Illinois State Bar Association> Washington State Bar
- Association

EDUCATION

- > Harvard Law School, J.D., cum laude, 1979
- > St. Olaf College, B.A., summa cum laude, 1975

PARTNER

Craig R. Spiegel

After helping obtain recent substantial settlements in cases against drug companies for deceptive marketing, Mr. Spiegel now helps in the firm's attempt to obtain justice for thalidomide victims.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

> Practice primarily focuses on class actions concerning unfair pricing of pharmaceutical drugs. Recent cases include actions against AstraZeneca and Merck

- > Helped obtain a substantial settlement for the state of New York and New York City in their litigation against Merck for losses suffered from deceptive marketing of the prescription drug Vioxx
- > Instrumental in obtaining a settlement for a class of Massachusetts consumers and third-party payors in their litigation against AstraZeneca, in which the class claimed that AstraZeneca deceptively marketed the prescription drug Nexium as superior to Prilosec
- > Deeply involved in the firm's lawsuits on behalf of thalidomide victims, who suffered severe personal injuries when their mothers ingested thalidomide during their pregnancies in the late 1950s and early 1960s, without knowing that thalidomide had not been approved by the FDA

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YEARS OF EXPERIENCE

PRACTICE AREAS
> Antitrust Litigation

BAR ADMISSIONS

- > Washington
- > Pennsylvania
- > U.S. District Court, Eastern District of Pennsylvania
- > U.S. District Court, Western District of Washington

EDUCATION

- > Temple University Beasley School of Law, J.D., Temple Law Review (Research Editor), 1994
- > Boston University, B.A., International Relations, 1990

Ronnie Seidel Spiegel

Ms. Spiegel has played a key role in litigating some of the largest antitrust cases in history, working on all aspects of these cases from filing through trial.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Extensive complex litigation experience with a particular focus on antitrust price-fixing cases
- > Specializes in managing large-scale and foreign discovery
- > Member of the American Bar Association's Antitrust Section

EXPERIENCE

- > Lead Antitrust Attorney and Manager of firm's North Carolina office, Spector Roseman Kodroff & Willis, Philadelphia, PA, Attorney, 1994-2000
- > Central Piedmont Community College, Charlotte, NC, Business Law Instructor, 2000-2001

NOTABLE CASES

- > In re DRAM Antitrust Litigation
- > In re SRAM Antitrust Litigation
- > In re Cathode Ray Tube (CRT) Antitrust Litigation
- > In re TFT-LCD (Flat Panel) Antitrust Litigation
- > In re Lithium Ion Batteries Antitrust Litigation
- > In re Brand Name Prescription Drugs Antitrust Litigation
- > In re NASDAQ Market-Makers Antitrust Litigation
- > In re Vitamins Antitrust Litigation
- > In re High Fructose Corn Syrup Antitrust Litigation
- > In re Commercial Tissue Paper Antitrust Litigation
- > In re Flat Glass Antitrust Litigation
- > In re Linerboard Antitrust Litigation
- > In re Automotive Parts Antitrust Litigation
- > In re Air Cargo Antitrust Litigation
- > In re Fasteners Antitrust Litigation
- > In re Korean Air Antitrust Litigation
- > In re Polyether Polyols Antitrust Litigation
- > In re OSB Antitrust Litigation

PERSONAL INSIGHT

Ronnie was a competitive figure skater and skating instructor. Now, she proudly enjoys playing the role of soccer mom to her three girls. On evenings and weekends, you can find her cheering at the field.



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YEARS OF EXPERIENCE

> 16

PRACTICE AREAS

- > Whistleblower Law (False Claims Act, SEC, IRS, CFTC)
- Appellate Litigation
 Human Rights/Public Interest

Law

BAR ADMISSIONS

> Washington

CLERKSHIPS:

- > Honorable Betty B. Fletcher, Ninth Circuit Court of Appeals, 2001-02
- > Honorable Charles S. Haight, Jr., Southern District of New York, 2000-01

EDUCATION

- > Yale Law School, J.D., 2000
- Gonzaga University, B.A., Philosophy and Political Science, Truman Scholar, summa cum laude (first-inclass), 1996

PARTNER

Shayne C. Stevenson

Since fighting against sweatshops and the exploitation of undocumented workers with the workers' rights organization he founded at Yale, Shayne has focused his legal career on prosecuting cases against individuals and businesses who victimize others by violence, deception and fraud.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Leads the firm's whistleblower practice
- > Litigated and argued cases in federal district courts and at the courts of appeal across the country and is handling whistleblower and other matters in several jurisdictions
- > His whistleblower practice includes, among other areas of focus, off-label promotion of drugs and medical devices, illegal kickbacks, Medicare and Medicaid reimbursement and coding abuse, home health care and hospice fraud, financial fraud, various forms of market manipulation, securities and bond market fraud, mortgage fraud, tax fraud, education fraud, defense industry and other government contractor fraud.
- > Experienced in handling False Claims Act and other whistleblower cases against some of America's largest financial companies, medical device and pharmaceutical companies, hospitals, mortgage companies and others
- > Currently handling *qui tam* litigation under the False Claims Act in several federal and state courts, while also handling whistleblower actions under the SEC, CFTC and IRS whistleblower programs
- > Litigates select human rights and other public interest matters, including litigation against the Rio Tinto mining conglomerate that reached the Supreme Court in 2013 in a suit under the Alien Tort Statute for war crimes and genocide on the island of Bougainville, in Papua New Guinea
- > Litigated and settled class-action cases on behalf of consumers and workers, and was previously a prosecutor who successfully tried several felony cases to juries and argued several cases in trial and appellate courts

RECENT SUCCESS

Mr. Stevenson handled the settlement of both False Claims Act whistleblower cases against Bank of America that culminated in the historic \$1 billion settlement between the Department of Justice and Bank of America addressing mortgage fraud. First, whistleblower client Mr. Kyle Lagow (in U.S. ex rel. Lagow v. Countrywide Financial Corp.) received \$14,625,000 million for his help in sparking a Department of Justice investigation of Countrywide and Bank of America's fraudulent mortgage origination and appraisal practices. Second, whistleblower client Mr. Gregory Mackler (in U.S. ex rel. Mackler v. Bank of America) helped the Department of Treasury recover several million dollars from Bank of America for allegedly violating its agreement with the Department to properly administer the Home Affordable Mortgage Program (HAMP) for struggling homeowners.

PARTNER Shayne C. Stevenson

EXPERIENCE

- > King County Prosecuting Attorney's Office, Felony Prosecutor
- > U.S. Attorney's Office, District of Connecticut, Intern

PUBLICATIONS

> Author, "The Honorable Betty B. Fletcher: A Tribute to a Legal Trailblazer," Federal Bar Association, November 2012

PRESENTATIONS

- > Speaker: "Financial Fraud," National Qui Tam Conference. Los Angeles, CA. Nov. 3-4, 2016
- > Speaker: "Representing Dodd-Frank Whistleblowers," Taxpayers Against Fraud Education Fund, Annual Conference. Washington, D.C. Nov. 16, 2015.
- > Speaker: "Secrets from the Plaintiff's Bar," Hospital and Health Care Law Conference. Seattle, WA. April 24, 2015.
- > Speaker: "False Claims in the Financial Sector," False Claims and Qui Tam Enforcement Conference. New York, New York. January 21-22, 2015.
- > Lecture: "Access to Civil Remedy," Business, Social Responsibility, & Human Rights, University of Washington School of Law. Seattle, Washington. November 4, 2014.
- > Speaker: "Enforcement of Financial Fraud," False Claims Act: National Qui Tam Conference. San Francisco, California. October 27-28, 2014.
- > Lecture: "Human Rights Law After Kiobel," University of Washington School of Law. Seattle, Washington. November 12, 2013.
- > Speaker: "Financial Fraud Enforcement," False Claims Act: All Points of View, National Conference. San Francisco, California. April 18-19, 2013.
- > Lecture: "Strategy after Kiobel and Bauman," International Human Rights Seminar, University of Washington School of Law. Seattle, Washington. April 17, 2013.
- > Lecture: "Alien Tort Statute and Human Rights Litigation," University of Washington School of Law. Seattle, Washington. November 13, 2012.
- > Speaker: "Protecting Whistleblowers, Protecting the Public," Whistleblowing: Law, Compliance, and the Public Interest. Government Accountability Project. Seattle University School of Law. Seattle, Washington. March 23, 2012.

MEDIA INTERVIEWS

- "What SEC Whistleblowers Should Know About Insider Trading," (Guest Column) ValueWalk, Oct. 20, 2016 <u>view »</u>
- > "SeaWorld Urges Judge to Toss Whale Abuse Class Action," Law360, Oct. 6, 2015 view »
- > "9th Circuit's FCA Ruling to Spark More Whistleblower Fights," Law360, July 9, 2015 view »
- > "Flash Crash' Case Gets Scrutinized," Automated Trader, May 4, 2015. view »
- > "Flash Crash Whistleblower May Get Millions of Dollars," Reuters, Apr. 23, 2015. view »
- > "'Flash Crash' Arrest Shakes Investors' Confidence," USA Today, Apr. 23, 2015. view »

PARTNER Shayne C. Stevenson

- > "UK Trader Arrested Over 2010 Flash Crash," Financial Times, Apr. 22, 2015. view »
- > "'Flash Crash' Charges Filed," The Wall Street Journal (front-page), Apr. 21, 2015. <u>view »</u>
- > "UK Speed Trader Arrested," Reuters, Apr. 21, 2015. view »
- > "How a Mystery Trader May Have Caused the Flash Crash," Bloomberg, Apr. 21, 2015. view »
- > "CFTC, Feds Accuse UK HFT Trader of Role in Flash Crash," Law360, Apr. 21, 2015. view »
- "BATS to Pay \$14 Million to Settle Direct Edge Order-Type Case: A Record Amount," The Wall Street Journal, Jan. 12, 2015. <u>view »</u>
- > "BATS Exchange to Pay Record \$14 Million SEC Fine," Reuters, Jan. 12, 2015. view »
- SEC Issues Largest Fine Ever to Exchange Over High-Frequency Trading Infractions," Value Walk, Jan. 12, 2015. <u>view »</u>
- "IRS Releases Comprehensive Whistleblower Final Regs.," Standard Fed. Tax Reports, Aug. 14, 2014. <u>view »</u>
- > "Bank of America Whistleblower's Payday Lead to Calls for Reform," Law360, Aug. 6, 2014. view »
- > "UBS Whistleblower Ruling Reignites Arbitration Debate," Law360, Jan. 30, 2014. view »
- > "With \$2B J&J Deal, FCA Proves It's Still The Anti-Fraud King," Law360, Nov. 4, 2013. view »
- > "Bank of America Fraud Trial Spotlights Whistleblower Awards," Reuters, Sept. 27, 2013. view »
- > "FCPA Whistleblower Bounty May Turn Tide For SEC Program," Law360, Aug. 20, 2013. view »
- > "Whistleblower Attorneys Eye DOJ Fraud Theory for New Bounties," Law360, Aug. 7, 2013. view »
- > "SEC's Second Whistleblower Award is Tip of the Iceberg," Law360, June 14, 2013. view »
- > "UBS Ruling Allays Fear Factor for SEC Whistleblowers," Law360, May 22, 2013. view »
- > "Five Tips for Building Bridges with Whistleblowers," Law360, Mar. 20, 2013. view »
- "For Superfast Stock Traders, a Way to Jump Ahead in Line," Wall St. Journal (front-page) Sept. 19, 2012. <u>view »</u>
- > "UBS Whistleblower Nets \$104 Million Award," CNN Money, Sept. 12, 2012. view »
- > "Whistleblower Takes Home \$14.5M in BoA Mortgage Deal," Law360, May 29, 2012. <u>view »</u>
- > "BoA Denied Homeowners Access to HAMP: Whistleblower," Law360, Mar. 7, 2012. view »
- > "Countrywide Inflated Home Values: Whistleblower Suit," Law360, Feb. 24, 2012. view »
- > "Killers of Somali Cabbie Get Longest Sentences Allowed," Seattle P-I, Mar. 24, 2006. view »

- > U.S. ex rel. Lagow v. Bank of America, Eastern District of New York (False Claims Act FHA fraud)
- > U.S. ex rel. Mackler v. Bank of America, Eastern District of New York (False Claims Act HAMP fraud)
- > U.S. ex rel. Nowak v. Medtronic, Inc., District of Massachusetts (False Claims Act off-label marketing)
- > U.S. ex rel. Kite v. Besler Consulting, et al., District of New Jersey (False Claims Act Medicare "outlier" fraud)
- > U.S. ex rel. Polansky v. Pfizer, Inc., Eastern District of New York (False Claims Act off-label marketing)
- > Sarei v. Rio Tinto, Central District of California (Alien Tort Statute international human rights litigation)
- > Tittle v. United States Postal Service, Western District of Washington (Privacy Act employee class action)
- > Hutchinson v. British Airways Plc, Eastern District of New York (Montreal Convention consumer class action)

Case 4:13-md-02420-YGR Document 1810 Filed 05/26/17 Bage 412 of 460 SHAPIRO LLP



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YEARS OF EXPERIENCE

> 14

PRACTICE AREAS

- > Antitrust
- > Consumer Rights
- > Environmental Law
- > Employment Law
- > Intellectual Property

BAR ADMISSIONS

> Washington

EDUCATION

- > Georgetown University Law Center, J.D., Georgetown International Environment Law Review, 2000
- Princeton University, B.A., History, Certificate African-American Studies, cum laude, 1997

PARTNER Ivy Arai Tabbara

Ms. Tabbara worked on a multimillion dollar settlement for uninsured individuals against Tenet Healthcare.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on complex class-action lawsuits in the areas of antitrust, consumer protection, employment, environmental and product liability
- > Also specializes in patent litigation

RECENT SUCCESS

- > Baby Products Antitrust (\$35 million settlement)
- > Bayer Combination Aspirin Consumer Fraud (\$15 million settlement)
- > "Thomas the Tank Engine" Toys Lead Paint Products Liability (\$30 million settlement of federal and state cases)
- > Tenet Healthcare Cases II for uninsured patients nationwide (multimillion-dollar recovery, including significant non-monetary relief such as discounted rates, financial counseling, reasonable payment schedules and uniform collection policies)

LEGAL ACTIVITIES

> Member, Federal Bar Association of the Western District of Washington; Trustee, 2009-2010

NOTABLE CASES

- > Domestic Drywall Antitrust Litigation representing indirect and direct purchasers of wallboard in the United States
- > Checking Account Overdraft Litigation representing banking customers whose accounts were allegedly charged repeated overdraft fees
- > Patent litigation representing inventors in Shinsedai v. Nintendo (patent involving sports-themed motion control games in several Nintendo Wii games) and Flatworld v. Apple (patent involving the swipe function of all Apple products)
- > Optical Disk Drive Antitrust Litigation
- > DRAM Antitrust Litigation

PUBLICATIONS

> "The Silent Significant Minority: Japanese-American Women, Evacuation, and Internment During World War II," in *Women and War in the Twentieth Century: Enlisted with or Without Consent*, 1999

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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Patent Litigation
- > ERISA Litigation
- > Hotel Tax Litigation

BAR ADMISSIONS

- > New York
- > Oregon
- > Washington

EDUCATION

- Cornell Law School, J.D., cum laude, Articles Editor for Cornell International Law Review, 1991
- > Columbia University, B.A., English, 1986

Andrew M. Volk

Worked extensively on consumer claims against Expedia resulting in the largest summary judgment award in Washington state history

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on consumer litigation, including automobile defect litigation against General Motors and Kia
- > Works on hotel tax collection cases against the major online travel companies (OTC). To date, the firm has achieved settlements on behalf of Brevard County, Florida and the village of Rosemont, Illinois, and a finding against the OTCs in administrative proceedings on behalf of the city of Denver, Colorado. that is currently on appeal
- Extensively involved in ERISA cases for breach of fiduciary duties, including settlements of claims on behalf of employees of Enron, Washington Mutual Bank, General Motors, the Montana Power Company and Sterling Savings Bank

RECENT SUCCESS

> Worked on litigation against Expedia on behalf of a nationwide class of consumers who purchased hotel reservations and paid excessive "taxes and fees" charges. That case resulted in summary judgment in plaintiffs' favor and an eventual settlement for cash and credits totaling \$134 million.

EXPERIENCE

- > Mr. Volk was extensively involved in the tobacco litigation in the late 1990s.
- > Legal Writing and Research, University of Oregon School of Law, Instructor
- > Attorney, Legal Aid Society, New York City

- > Expedia Litigation (\$134 million settlement)
- > Tobacco Litigation on behalf of States (resolved in \$206 billion settlement)
- > Enron ERISA Litigation (\$265 million settlement)
- > Washington Mutual Bank ERISA Litigation (\$49 million settlement)
- > General Motors ERISA Litigation (\$37.5 million settlement)

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YEARS OF EXPERIENCE

> 17

PRACTICE AREAS

- > Consumer Rights
- > Patent Litigation
- > Antitrust Litigation
- > Securities / Investor Fraud

BAR ADMISSIONS

- > Washington
- > Oregon

EDUCATION

- > University of California Berkeley, Boalt Hall School of Law, J.D., 1996
- > University of Oregon, B.A., English, cum laude, 1992

PARTNER

Tyler S. Weaver

Tyler has successfully represented clients and classes as far-ranging as securities investors, homeowners, patent holders, business owners and protestors.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Litigates in a wide variety of practice areas; his cases have varied from litigation over the civil rights of protesters to securities fraud cases on behalf of investors to consumer protection litigation to patent litigation
- > Admitted to practice in Washington and Oregon, and has made numerous appearances in United States district courts and appellate courts, as well as the trial and appellate courts of the state of Washington

EXPERIENCE

> Clerk, Honorable Justin L. Quackenbush in the U.S. District Court for the Eastern District of Washington, 1999-2001

- > Bank of America Mortgage Modification Litigation (ongoing litigation)
- > Metropolitan Securities Litigation (recovered \$38 million)
- > Raytheon Securities Litigation (recovered \$39 million)
- > Diamond Parking Litigation (recovered \$2.2 million)
- > WTO Wrongful Arrest Litigation (recovered \$1 million and non-monetary relief)



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YEARS OF EXPERIENCE

> 16

PRACTICE AREAS

- > Consumer Protection
- > Securities Litigation
- > Unfair Competition

BAR ADMISSIONS

- > Washington
- > California

EDUCATION

- > University of Washington School of Law, J.D., 2000
- > University of Washington, B.A., English, 1997

Garth Wojtanowicz

Named a "Rising Star" by Super Lawyers Magazine in 2006, 2007, 2010

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on consumer protection cases
- > Currently working on cases against Fresenius Medical Care, N.A. and DaVita, Inc., the first and second largest dialysis companies in the United States, relating to those companies' use of GranuFlo.> Also working on a nationwide class action against medical waste disposal company Stericycle, Inc., challenging that company's pricing practices which resulted in hundreds of millions of dollars in over-charges to doctors' offices, dentist offices, hospitals and similar businesses

RECOGNITION

> "Rising Star" by Super Lawyers Magazine in 2006, 2007 and 2010

EXPERIENCE

- > Member, Cornerstone Law Group, PLLC
- > Associate, Danielson Harrigan Leyh & Tollefson, LLP
- > Assistant City Attorney, Seattle City Attorney's Office, Civil Division

NOTABLE CASES

> Toyota Sudden, Unintended Acceleration (SUA) class-action lawsuit on behalf of Toyota owners and lessees, which resulted in an historic settlement recovery valued at \$1.6 billion

PERSONAL INSIGHT

Mr. Wojtanowicz volunteers his time as a non-profit director for Girls Giving Back and the Blossoming Hill Montessori School and has worked as a volunteer attorney for the Northwest Immigrant Rights Project.

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YEARS OF EXPERIENCE

> 18

PRACTICE AREAS

- > Complex Litigation
- > Securities Litigation
- Antitrust Litigation
 Consumer Protection

BAR ADMISSIONS

- > U.S. Department of Veterans Affairs
- > New York
- > U.S. District Court
- Southern District of New York
- Eastern District of New York
- Eastern District of Michigan
- Eastern District of Wisconsin
- U.S. Court of Appeals
- Second Circuit
- Third Circuit

EDUCATION

- Columbia Law School, J.D.,
 Executive Editor for Columbia Journal of Environmental Law,
 1998
- > Indiana University, B.S., 1995

PARTNER

Jason A. Zweig

Mr. Zweig was a key member in the High Fructose Corn Syrup Antitrust Litigation which resulted in a \$531 million recovery—one of the largest antitrust and securities class actions in history.

CURRENT ROLE

- > Partner, Hagens Berman Sobol Shapiro LLP
- > Leads the firm's New York office
- > Extensively experienced in representing plaintiffs in antitrust, securities, consumer and other complex litigation
- > Experience representing large entities in opt-out litigation, as well as plaintiffs in class-action litigation
- > Key member in some of the largest antitrust and securities class actions in history including the *High Fructose Corn Syrup Antitrust Litigation* which resulted in a \$531 million recovery
- > Leads the firm's representation of a number of airlines and other merchants who have opted out of the class in *In re Payment Card Interchange Fee and Merchant Discount Litigation, MDL No. 1720 (E.D.N.Y.)*
- > Leads the firm's efforts in the *New Jersey Tax Sales Certificates Antitrust Litigation*, an antitrust class action in which the firm has been appointed co-interim class counsel (more than \$8 million recovered)
- > Co-led the firm's representation of payphone owners who sued a large national telecommunications carrier over unpaid dial-around compensation

EXPERIENCE

- > Partner, Kaplan Fox & Kilsheimer LLP in New York, 2003-2010
- > Associate, Proskauer Rose LLP in New York where he practiced in all areas of civil and criminal litigation
- > Judicial intern to the Honorable Jed S. Rakoff, U.S. District Court Judge for the Southern District of New York

RECOGNITION

> Rising Star, New York Super Lawyers Magazine, 2011 & 2013

PRESENTATIONS

- > "Class Action Settlements and Attorneys' Fees," Presentation to the Cleveland Metropolitan Bar Association, October 2008
- "Class Actions in the Wake of AT&T v. Concepcion," Presentation to the New Jersey Association for Justice November 2011

PARTNER

Jason A. Zweig

LEGAL ACTIVITIES

- > The Association of the Bar of the City of New York
- > The American Bar Association Sections of Litigation, Antitrust Law and International Law
- > Advisory Board of the Cartel and Criminal Practice Committee of the ABA Section of Antitrust Law
- > The New York State Bar Association
- > The Indiana University Student Foundation Board of Associates
- > The Jewish Board of Family and Children's Services, Children & Adolescents in Residence Divisional Board
- > Former Co-Chair of the Young Lawyer's Division of the UJA Federation-New York

- > Hill v. J.P. Morgan Madoff-related Litigation (\$218 million recovered)
- > High Fructose Corn Syrup Antitrust Litigation (\$531 million recovered)
- > In re Air Cargo Antitrust Litigation (Over \$500 million recovered—case still pending)
- > In re Polyether Polyols Antitrust Litigation (Over \$150 million recovered—case still pending)
- > Hydrogen Peroxide Antitrust Litigation (\$97 million recovered)
- > Plastics Additives Antitrust Litigation (\$46 million recovered)
- > NBR Antitrust Litigation (\$34 million recovered)
- > Linens Antitrust Litigation (\$11 million recovered)
- > In re Merrill Lynch & Co., Inc. Securities, Derivative & ERISA Litigation (\$475 million recovered)
- > Merrill Lynch Research Reports Securities Litigation (\$125 million recovered)
- > Salomon Analyst Metromedia Litigation (\$35 million recovered)



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YEARS OF EXPERIENCE

> 21

PRACTICE AREAS

- > Appellate
- > Consumer Rights
- > Securities
- > Employment Litigation

BAR ADMISSIONS

- > California
- > United States Supreme Court
- United States Courts of Appeals for the Third, Seventh, Eighth, Ninth, Tenth and District of Columbia Circuits
- United States District Courts for the Northern, Central, Eastern and Southern Districts of California

EDUCATION

> Notre Dame Law School, J.D., 1995

> University of California at Berkeley, B.A., 1989, with honors and distinction

CLERKSHIPS

- Supreme Court of Indiana (Hon. Theodore R. Boehm, Associate Justice)
- U.S. District Court for the Southern District of California (Hon. Barry T. Moskowitz, now Chief Judge)

senior counsel Kevin K. Green

Mr. Green is a career appellate lawyer. He has litigated class and other representative actions in the federal circuits, argued in ten states and six state supreme courts, and obtained multiple appellate reversals leading to significant settlements.

CURRENT ROLE

- > Senior Counsel, Hagens Berman Sobol Shapiro
- > Concentrates on appeals as well as consumer rights, securities and employment litigation
- > Certified Appellate Specialist, State Bar of California Board of Legal Specialization (since 2006)

NOTABLE DECISIONS

- > George v. Urban Settlement Serv., 2016 833 F.3d 1242 (10th Cir. 2016) (reinstating RICO class complaint against Bank of America)
- > Bristol-Myers Squibb v. Superior Court, 2016 1 Cal. 5th 783 (2016) (CAOC amicus curiae addressing personal jurisdiction in mass actions)
- > Garza v. Gama, --- P.3d ---, 2016 379 P.3d 1004 (Ariz. Ct. App. 2016) (reversing decertification of wage-and-hour class action)
- > McCormack v. Cao, 636 F. App'x 945 (9th Cir. 2016) (affirming "excellent result" valued at \$129 million for senior citizen class)
- > Duran v. U.S. Bank, 59 Cal. 4th 1 (2014) (CAOC amicus curiae addressing representative evidence in class actions)
- > Wong v. Accretive Health, 773 F.3d 859 (7th Cir. 2014) (upholding \$14 million securities settlement and elaborating loss causation element)
- > Harris v. Superior Court, 207 Cal. App. 4th 1225 (2012) (settled for \$65 million for employee class after reversal on liability and class certification)
- > Lynch v. Rawls, 429 F. App'x 641 (9th Cir. 2011) (settled for \$15 million after first Ninth Circuit reversal on presuit demand requirement)
- > Kwikset Corp. v. Superior Court, 51 Cal. 4th 310 (2011) (rejecting stringent interpretation of UCL standing prerequisites)
- > Luther v. Countrywide Fin. Corp., 195 Cal. App. 4th 789 (2011) (Securities Act class actions permitted in state court, leading to \$500 million settlement)
- > In re F5 Networks, Inc. Derivative Litig., 207 P.3d 433 (Wash. 2009) (Washington follows demand futility standard, not universal demand rule)
- > Troyk v. Farmers Group, 171 Cal. App. 4th 1305 (2009) (auto insurance policy not specifying premium on declarations page violated UCL
- > Alaska Elec. Pension Fund v. Brown, 941 A.2d 1011 (Del. 2007) (en banc) (intervening shareholders who show corporate benefit may seek fee award)
- > McKell v. Wash. Mutual, 142 Cal. App. 4th 1457 (2006) (UCL complaint not preempted by federal real estate and banking regulations)
- > In re Guidant S'holders Derivative Litig., 841 N.E.2d 571 (Ind. 2006) (Indiana also follows demand futility, not universal demand)
- > Lebrilla v. Farmers Group, 119 Cal. App. 4th 1070 (2004) (reversing and ordering class certification of UCL claims)
- > Lavie v. Procter & Gamble Co., 105 Cal. App. 4th 496 (2003) (leading precedent on California's reasonable consumer standard under UCL and related statutes)

senior counsel Kevin K. Green

RECOGNITION

- > Top 100 California Appellate Lawyers, American Society of Legal Advocates, 2015-2016
- > California Academy of Appellate Lawyers
- > Super Lawyer, 2008-2016
- > Legal Aid Society of San Diego, Outstanding Service Award, 2015
- > Consumer Attorneys of California, Presidential Award of Merit, 2013

LEGAL ACTIVITIES

- > Appellate Advisory Committee, Judicial Council of California (appointed by Chief Justice)
- > Magistrate Judge Merit Selection Panel, Southern District of California (appointed by Chief Judge)
- > Co-Chair, CAOC Amicus Curiae Committee
- > Co-Founder, Civil Appellate Self-Help Workshop (California Court of Appeal, San Diego)
- > Appellate Court Committee, San Diego County Bar Association (Chair, 2010)
- > California State Bar Committee on Appellate Courts (2006-09)

PUBLICATIONS

- > Amicus Curiae Update, Forum (regular column for CAOC's periodical)
- > Forfeiture at the Pleading Stage: Ask Permission First, Don't Apologize Later, California Litigation (Vol. 28, No. 1, 2015) (with Rupa G. Singh) (Journal of State Bar Litigation Section)
- > Closing the Appellate Justice Gap, Los Angeles Daily Journal (Feb. 10, 2015)
- > Appellate Review in California Class Actions, California Litigation (Vol. 24, No. 2, 2011) (Journal of State Bar Litigation Section)
- > A Tool for Mischief: Preemptive Defense Motions Under BCBG Overtime Cases to Reject Class Certification, Forum (Vol. 39, No. 1, Jan./Feb. 2009) (with Kimberly A. Kralowec)
- > The Unfair Competition Law After Proposition 64: The California Supreme Court Speaks, Competition (Vol. 15, No. 2, Fall/Winter 2006) (Journal of State Bar Antitrust & Unfair Competition Law Section)

PRESENTATIONS

- > CAOC Webinar (Ninth Circuit Practice: Everything but the Brief, Nov. 2016)
- > Bridgeport Class Action Litigation Conference (Objectors, Sept. 2016)
- > University of San Diego School of Law (Legal Writing in Practice Seminar, Feb. 2015)
- > CAOC Annual Convention (Class Action Update, Nov. 2014)
- > San Diego County Bar Association (Moderator, Pleasing the Court: Making Your Oral Argument Count, Oct. 2014)
- > State Bar of California Annual Meeting (Forfeiture: A Four-Letter Word in the Court of Appeal, Sept. 2014)
- Consumer Attorneys of San Diego, Class Action Symposium (Appellate Perspective on Class Actions, May 2014)
- > State Bar of California Golden State Institute (California Supreme Court Panel, Oct. 2012)
- > State Bar of California Annual Meeting (Moderator, Preparing an Appellate Record, Sept. 2009)
- > CAOC Annual Convention (Employment Litigation Panel, Nov. 2008)

PERSONAL INSIGHT

Concerned a legal career meant taking life too seriously, Kevin spent several years before law school blending work and travel. He toiled as a luggage porter in Australia and scaled a live volcano in Guatemala. He taught English in Switzerland and ran with the bulls at Pamplona before easing into a monastic life of appellate practice.

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(617) 475-1954 office (617) 482-3003 fax grega@hbsslaw.com

YEARS OF EXPERIENCE

PRACTICE AREAS

> Antitrust Litigation

> Personal Injury Litigation

BAR ADMISSIONS

- > Massachusetts
- > U.S. District Court, District of Massachusetts
- > Court of Appeals, 2nd Circuit

EDUCATION

- > Fairfield University, B.S., Marketing, 1991
- > Villanova University School of Law, J.D., 1996 (served on Law Review)

Gregory T. Arnold

Led efforts on behalf of three law firms protecting the interests of more than 25,000 asbestos sufferers, resulting in the denial of the debtors' proposed plan of reorganization and a substantial payment to the claimants.

CURRENT ROLE

- > Of Counsel, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on prosecution of large-scale, nationwide class actions, primarily against the pharmaceutical industry
- > Works on behalf of large health care providers, seeking recoveries from tortfeasors associated with payments the providers make as a result of the harm they have caused
- > Works on the Direct Purchaser Class Action cases in Lipitor and Effexor

RECENT SUCCESS

- > Represented a variety of states, including the Commonwealth of Massachusetts, in their cases against the tobacco industry
- > Led efforts on behalf of three law firms protecting the interests of more than 25,000 asbestos sufferers, resulting in the denial of the debtors' proposed plan of reorganization and a substantial payment to the claimants
- Prior bankruptcy experience included representing an Ad Hoc Committee of Trade Creditors in the In re WorldCom matter, resulting in a near 50% increase in the clients' recovery
- > Represented large groups of investors in litigation brought against offshore hedge funds, pursuing the recovery of hundreds of millions of dollars
- > Represented national and international clients on a full range of patent litigation issues, including proceedings before the International Trade Commission
- > Successful eminent domain trials, representing companies and individuals on a variety of labor and employment issues including non-compete agreements and various intellectual property matters

EXPERIENCE

> Income Partner, Litigation Department for a large Boston-based law firm

NOTABLE CASES

> Bankruptcy-related litigation

- Lead efforts on behalf of three law firms protecting the interests of more than 25,000 claimants suffering from asbestos-related diseases, to block a proposed plan of reorganization. During more than 5 years of litigation, succeeded in forcing numerous changes to the proposed plan, including the voting methodology, amount of contribution and distributions. Pursued several interlocutory appeals throughout the case. Oversaw and managed all aspects of this complex litigation, culminating in a successful 20-day bench trial conducted in the Bankruptcy Court for the Southern District of New

of counsel Gregory Arnold

York, after which the Court rejected the proposed bankruptcy plan, thereby securing a substantial benefit for the clients.

- One of a team of lawyers representing the interests of The Ad Hoc Committee of Trade Creditors in the *In re* WorldCom matter, resulting in increasing our clients' recoveries by nearly 50%.

> Mass Torts/Class Actions

- Played pivotal role in representing the Commonwealth of Massachusetts in landmark litigation against the Tobacco Industry, including establishing personal jurisdiction in Massachusetts over the United Kingdom-based parent company to Brown & Williamson. This work product, as well as the resulting Court decision, was relied upon by Attorneys General throughout the country in their cases against the Tobacco Industry.
- Following the Commonwealth of Massachusetts' action, lead Brown Rudnick's efforts in pursuing a Successfully defended a class action case brought against a major credit card issuer, obtaining a denial of class certification and dismissal of individual's claims.
- > Complex Financial Litigation
 - Successfully represented a group of more than 65 investors in offshore hedge funds, pursuing recoveries for over \$600 million of invested capital lost due to fraudulent practices of hedge fund manager.
- > General Commercial Litigation
 - Represented former attorney whose malpractice insurer had refused defense and indemnity after an office worker embezzled millions of dollars in client funds. Following a five-week Superior Court trial, secured a verdict in favor of the client, holding the insurance company responsible for more than \$2 million in liability to the insured's former client. Successfully defended insurer's appeal of the trial court decision in the Appeals Court. Subsequently brought a case against the insurance company under Chapter 93a, resulting in a multi-million dollar recovery for the client.
 - Obtained a substantial recovery for a client whose intellectual property was wrongfully assigned to a third-party. Achieved a pre-trial settlement with the assigning party while pursuing a bench trial in Middlesex Superior Court against the party using the software.
- Served as "first chair" in a complex, multi-week bench trial in federal court over breach of multimillion dollar commercial contract concerning sale of radiology equipment, including prevailing on counter-claim seeking to impose multi-million dollar liability.

> Patent Litigation

Represented national and international clients on a full range of patent litigation issues, including trials.
 Successful litigator before the United States International Trade Commission, including obtaining favorable outcome for a client protecting their intellectual property rights against an infringer based in Sweden.

> Labor and Employment Litigation

- Defended client interests in a variety of matters, including those involving non-competition agreements, wrongful terminations, and harassment claims.
- Successfully represented companies enforcing non-compete agreements against former employees, as well as new employers/former employees in avoiding the terms of non-compete agreements.

of counsel Gregory Arnold

Handled trials before administrative bodies, including the U.S. Department of Labor, including defending a client against claims made under the Surface Transportation Assistance Act ("STAA") following the termination of an employee/truck driver.

- > Other Litigation
 - Represented client in an eminent domain trial, resulting in a jury award more than 10 times the Commonwealth's pro tanto offer.

of counsel Karl Barth

Key member on firm's securities fraud cases against companies such as Boeing, Einstein Noah Bagel Corp., Pepsi Puerto Rico Bottling Co., PriceCostco, Templeton Vietnam Opportunities Fund and Wall Data.

CURRENT ROLE

> Of Counsel, Hagens Berman Sobol Shapiro LLP

- > Previously with the firm from 1994 through 2004 before he rejoined in 2010
- > Key member on firm's securities fraud cases against companies such as Boeing, Einstein Noah Bagel Corp., Identix, Midcom Communications, MidiSoft, Oppenheimer Delta Partners, Pepsi Puerto Rico Bottling Co., PriceCostco, Templeton Vietnam Opportunities Fund and Wall Data
- > Represents investors seeking to protect assets and recover investment losses from companies engaged in securities and accounting wrongdoing

EXPERIENCE

- > Certified Public Accountant
- > Certified Fraud Examiner
- > Certified in Financial Forensics
- > Consultant at a national financial consulting firm specializing in expert witness testimony on accounting and financial issues
- > Graduated from Georgetown University Law Center, and from the University of Virginia with a B.S. in Accounting

CONTACT

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YEARS OF EXPERIENCE

PRACTICE AREAS

> Securities Litigation> Investor Rights

BAR ADMISSIONS

> Washington

EDUCATION

- > Georgetown University Law Center, J.D.
- > University of Virginia, B.S. Accounting, Certified Public Accountant



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YEARS OF EXPERIENCE

BAR ADMISSIONS

> Arizona

COURT ADMISSIONS:

- > U.S. District Court, District of Arizona
- > U.S. Court of Appeals for the 9th Circuit

EDUCATION

- University of Arizona, James
 E. Rogers College of Law,
 J.D., Tucson, Arizona, 2007
- University of Southern
 California, B.A., Summa Cum
 Laude, Phi Beta Kappa, Los
 Angeles, California, 2004

of counsel Molly A. Booker

Ms. Booker has a depth of commercial litigation experience across a variety of industries including business litigation, financial services, trademark and business torts.

CURRENT ROLE

> Of Counsel, Hagens Berman Sobol Shapiro LLP

EXPERIENCE

- > Shareholder, Litigation Attorney, Ryley, Carlock & Applewhite, P.A., Phoenix, AZ, 2007 2016
- > Legal Intern, Federal Public Defender's Office Phoenix, Phoenix, AZ, Summer 2005

LEGAL ACTIVITIES

- St. Mary's Food Bank Alliance, Advisory Board Member and Mission & Means Committee Member, 2014-Present
- > Arizona Asian American Bar Association, Member, 2009-Present
- > State Bar of Arizona Committee on Minorities and Women in the Law, Past Chair

PRESENTATIONS

- > "Current Legal Landscape," University of Arizona Law School Board of Visitors, Panelist, April 2014
- > "The Pen is Mightier than the Sword: Tips for Drafting and Enforcing Your Business Contracts," Better Business Bureau Accredited Business Seminar, August 2013
- > "Arbitration in Arizona and the Revised Uniform Arbitration Act," Better Business Bureau Accredited Business Seminar, June 2011
- > "How to Turn Your Summer Job Into a Full-Time Position," Arizona State University College of Law, Sponsored by the State Bar of Arizona Committee on Minorities and Women in the Law, April 2011
- > "Mechanics" and Materialmen's Liens: Understanding and Protecting Your Rights as a Contractor, Supplier, Property Owner, or Tenant," Better Business Bureau Legal Series Seminar, May 2009
- > "Lock It Up: Protecting Your Trade Secrets and Preventing Unfair Competition," Trade Secrets and Restrictive Covenants Seminar, September 2008

LANGUAGES

> Spanish

PERSONAL INSIGHT

Molly enjoys athletic challenges and her favorite pastimes are soccer, cycling and running. Endurance is her forte, and with good fortune, because she is a mom to triplets. Molly also has a penchant for learning foreign languages. She is fluent in Spanish and lived in Madrid, Spain.



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YEARS OF EXPERIENCE

PRACTICE AREAS

> Patent Infringement

- > Trademark and Trade Dress Infringement
- > Trade Secret Misappropriation
- > Complex Litigation

BAR ADMISSIONS

- > Washington
- > U.S. District Court, Western District of Washington
- > U.S. Court of Appeals, Federal Circuit
- > Numerous other jurisdictions pro hac vice

EDUCATION

- > University of Puget Sound School of Law, J.D., cum laude, 1987
- > University of Washington, B.A., History, 1984

of COUNSEL Mark S. Carlson

Mr. Carlson is an active member of the legal community frequently making presentations to legal forums and industry groups on intellectual property law.

CURRENT ROLE

- > Of Counsel, Hagens Berman Sobol Shapiro LLP
- > Working in intellectual property since 1987, handling a full range of intellectual property litigation focused primarily on patent infringement disputes
- Currently representing FlatWorld Interactives in patent infringement litigation against Apple, Samsung and LG involving touch screen gesture recognition technology in the iOS and Android operating systems, Thought Inc. against Oracle involving software application data persistence technology, and the University of Utah in patent infringement litigation regarding RNA interference therapies for genetic diseases
- > Active member of the legal community making presentations in legal forums and industry groups on intellectual property law
- > Active participant in the Seattle Intellectual Property Inn of Court and Washington State Patent Law Association

RECENT CASES

- > Twice litigated against AT&T on wireless handset, network and telematics patents
- > Twice litigated on behalf of The Nautilus Group in patent, trademark, false advertising and unfair competition cases involving the BowFlex exercise machine and other exercise equipment
- > Represented the owner of tradedress rights to the Stanley Classic vacuum bottle in trade dress litigation against Thermos
- > Represented a software patent licensor in litigation against Microsoft over the scope of a license for relational database technology

EXPERIENCE

- > Dorsey & Whitney, Patent Litigation Group
- > Bogle & Gates, Intellectual Property Litigation Group

PUBLICATIONS/PRESENTATIONS

- > "The European Privacy Directive for Personal Data," American Electronics Association Newsline for the Washington State Council
- > "Recovery of Pure Economic Loss in Product Liability Actions: An Economic Comparison of Three Legal Rules," University of Puget Sound Law Review
- > "Patent Litigation and the Non-Practicing Entity," ITRI IP Executives Conference, University of Washington Foster School of Business, 2012

of counsel Mark S. Carlson

- > "Vernor v. Autodesk, the Future, or Demise, of the First Sale and Essential Step Defenses in Copyright," Seattle Intellectual Property Inn of Court, 2011
- "What Are My Odds? A Disciplined Approach to Assessing Case Value and Litigation Risk," Seattle Intellectual Property Inn of Court, 2010
- > "Medimmune v. Genentech: Consequences for Patent Licenses, Litigation and Settlements," 2009
- > "E-Discovery and the New Federal Rules," 2008
- > "Recent Developments in Pharmaceutical Patents," 2008

LEGAL ACTIVITIES

- > Seattle Intellectual Property Inn of Court
- > Washington State Patent Law Association
- > American Intellectual Property Law Association

- > Thought v. Oracle
- > FlatWorld v. Apple; v. Samsung; v. LG
- > University of Utah v. Max Planck Institute, et al.
- > Airbiquity v. AT&T, et al.
- > Timeline v. Microsoft; v. Oracle; v. Sagent
- > The Nautilus Group v. Icon Health and Fitness



Philip J. Graves

Mr. Graves brings to the firm more than 20 years of experience as a patent and intellectual property litigator, having represented companies in patent cases in many technical fields.

CONTACT

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(213) 330-7147 office (213) 330-7152 fax phillipg@hbsslaw.com

YEARS OF EXPERIENCE

PRACTICE AREAS

> Intellectual Property

BAR ADMISSIONS

- > U.S. Supreme Court
- > Supreme Court of California
- > U.S. Court of Appeals, Federal Circuit
- > U.S. Court of Appeals, Ninth Circuit
- > U.S. District Court, Central District of California
- > U.S. District Court, Northern District of California
- > U.S. District Court, Eastern District of California
- > U.S. District Court, Southern District of California

EDUCATION

- Columbia University School of Law (J.D., 1990)
 Harlan Fiske Stone Scholar
 Writing and Research Editor,
 Columbia Business Law
 Review
- University of Washington (B.A., cum laude, 1987)
 Phi Beta Kappa
 Robert A. Dahl Award

CURRENT ROLE

OF COUNSEL

- > Of Counsel, Hagens Berman Sobol Shapiro, head of the firm's intellectual property practice
- > Practice focuses on intellectual property, including cases involving trademark infringement, copyright infringement, unfair competition and misappropriation of trade secrets

EXPERIENCE

> Before joining Hagens Berman, Mr. Graves' practice focused on represented technology companies in patent cases involving network security, web-hosting, image capture, digital signature and encryption technologies, nano-scale manufacturing and biotech, among many other technical fields.

LEGAL ACTIVITIES

- > State Bar of California
- > Alaska Bar Association
- > Los Angeles Intellectual Property Law Association
 - 2015 Judges' Night, Chair
 - 2011 Spring Seminar, Chair
- > American Intellectual Property Law Association
- > Federal Circuit Bar Association

AWARDS & RECOGNITION

- > Pasadena Top Attorney, Pasadena Magazine (2016)
- > 40 Angelenos to Know in Intellectual Property Law, Los Angeles Business Journal (2012)
- > Southern California Super Lawyers®, Intellectual Property Litigation, Business Litigation (2004-2016)

PUBLICATIONS

- > Preparing to Defend a Section 337 Action: What District Court Litigators Need to Know, Lead Author, New Matter (Fall 2014)
- Intellectual Property: It's Not Just for Specialists Anymore, Co-Presenter, Association of Corporate Counsel (Southern California Chapter), Long Beach, CA (June 19, 2014)
- > Section 337: Whether to Respond or Default, Lead Author, Intellectual Property Today (June 9, 2014)
- > U.S. Patent Litigation under Section 337, Presenter, Shijingshan Scientific and Technological Services Alliance/Beijing Intellectual Property Office/Zhongguancun Scientific and Technological Park, Beijing,

of COUNSEL Philip Graves

China (May 6, 2014)

- > Double Exposure: Keeping Your Confidential Information Out of the Public Eye in the Wake of Apple v. Samsung, Lead Author, ABA Landslide Magazine (May/June 2013 Issue)
- > Potential Ramifications of Already v. Nike, Lead Author, Law360 (September 6, 2012)
- > U.S. Patent Litigation Involving Pharmaceutical Patents, Co-Presenter, Taiwan Medical and Pharmaceutical Industry Technology and Development Center, Taipei, Taiwan (May 25, 2012)
- > Developments in Trademark Law and the Internet: Domain Name Disputes, Banner Ads, Pop-Ups, and Related Issues, Author, 2004 Intellectual Property Institute of the State Bar of California
- > Damages in Copyright and Patent Infringement Actions, Author, Intellectual Property Law Section of the Alaska Bar Association

NOTABLE CASES

- > Stamps.com, several patent infringement cases involving online postage generation and delivery, network security, digital signature and encryption technology. As lead trial counsel, obtained a jury verdict in Stamps.com's favor, avoiding over \$30 million in damages.
- Web.com Group, patent infringement suits in Arizona and Texas concerning a variety of backend and client-facing content hosting and delivery functionalities, as well as several business litigation matters in California in which Mr. Graves obtained a dismissal of one suit on summary judgment and affirmance of another favorable judgment on appeal.
- > Fotona d.d., a European manufacturer of medical lasers, in a patent infringement action involving dental laser surgery technology. Following a three day evidentiary hearing, Mr. Graves obtained a favorable resolution of the case and a full award of attorneys' fees for the client.
- > Developer of motion capture technology, breach of contract action involving rights in the technology. As lead trial counsel, obtained a verdict in favor of the client as well as an award of all of the client's attorneys' fees.
- > Designer and importer of consumer electronics products, represented in a patent infringement action venued in the International Trade Commission. The complainant dismissed its complaint on the eve of trial, following the filing of the parties' pretrial briefs and witness statements.
- > Large publicly traded company, in several patent infringement suits in California and Texas involving rapid prototyping technology.
- > Technology development company, represented in a patent infringement suit involving imaging systems used at tourist attractions and theme parks.
- > Cosmetics company, represented in consolidated suits alleging unfair competition and infringement of patents covering various prostaglandin analogs.

PERSONAL INSIGHT

Phil took a break from his judicial clerkship in 1991 to travel a war zone (Croatia, Serbia, Kosovo) and was chased down a mountainside by Kosovar rebels.



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YEARS OF EXPERIENCE

> 13

PRACTICE AREAS

- > Commercial Litigation
- > Complex Civil Litigation

BAR ADMISSIONS

- > Arizona
- > U.S. District Court for the District of Arizona

EDUCATION

- Arizona State University
 College of Law, J.D., magna
 cum laude, 2003
- > Arizona State University, B.A., 1997

of counsel Michella A. Kras

State Bar of Arizona President's Volunteer Service Award, 2010

CURRENT ROLE

> Of Counsel, Hagens Berman Sobol Shapiro LLP

- > Practice focuses on class actions and complex litigation
- > Extensive expertise in complex litigation in a variety of commercial contexts, including actions involving various contractual breaches, RICO violations, securities fraud, negligent and intentional torts, and federal and state employment law

RECOGNITION

- > State Bar of Arizona President's Volunteer Service Award, 2010
- > Rising Star, Southwest Super Lawyers, 2014

EXPERIENCE

- > Member of the commercial and securities litigation group in the Phoenix office of an international law firm where she worked on complex litigation matters involving private securities offerings, private lending, asset purchase agreements, shareholder and member disputes, and federal and state wage and hour disputes
- > Associate, Steptoe & Johnson LLP, 2007-2013
- > Associate, Gammage & Burnham, work included civil litigation, employment law, election law, health care law and estate planning, 2004-2007
- > Judicial Law Clerk, Arizona Supreme Court, work consisted of a variety of appeals, including civil cases, criminal actions and attorney discipline, 2003-2004

LEGAL ACTIVITIES

- > Consistent commitment to pro bono work. She's worked on several pro bono matters, including obtaining Special Juvenile Immigrant Status for a teenager that was brought to the United States as a toddler and later abandoned by her parent
- > Volunteer and member of the steering committee for Wills for Heroes, an organization that provides free estate planning for Arizona's first responders

NOTABLE CASES

> Successfully litigated and obtained summary judgment on multiple matters involving breach of contract, conversion, intentional interference and breach of fiduciary duty, even successfully piercing the corporate veil



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YEARS OF EXPERIENCE

> 27

PRACTICE AREAS

- Consumer Protection
- > Complex Commercial
- > Antitrust Litigation

BAR ADMISSIONS

- > Massachusetts
- > U.S. District Court, District of Massachusetts

EDUCATION

- > Boston University, J.D., with Honors, 1994, served on the Boston University Public Interest Law Review
- > Brown University, B.A., 1989

of COUNSEL Ed Notargiacomo

Mr. Notargiacomo is involved in a number of large class-action suits against large pharmaceutical manufacturers in both the consumer protection and antitrust areas.

CURRENT ROLE

- > Of Counsel, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on complex consumer, commercial and antitrust litigation

RECENT SUCCESS

- > Relafen Antitrust Litigation (\$85 million settlement)
- > In re Lupron Marketing and Sales Practices Litigation (\$150 million settlement)
- > In re Pharmaceutical Manufacturers Average Wholesale Price Litigation (\$300 million in settlements)
- > In re Vytorin/Zetia Marketing, Sales Practices, and Products Liability Litigation (\$80 million settlement)
- > In re Flonase Antitrust Litigation (\$150 million settlement)
- > In re Wellbutrin Antitrust Litigation (\$21 million settlement)
- > In re Skelaxin Antitrust Litigation (settlement pending)

EXPERIENCE

- > Served as Special Assistant Attorney General for Massachusetts in its suit against the tobacco industry to recoup funds expended to treat smoking-related illnesses
- > Helped represent Rhode Island, New Hampshire and Maine in their suits against the tobacco industry
- > Represented the city of Boston in its suit against gun manufacturers and distributors in order to force them to take responsibility for violence perpetrated with firearms that they negligently and illegally distributed in cities like Boston
- > Experience also includes consumer class actions against predatory lenders and employment litigation against a major retail chain, as well as intense involvement in high-profile impact litigation against cigarette manufacturers and the firearms industry
- > Lieff, Cabraser, Heimann & Bernstein, LLP, Boston, MA

Litigation of consumer class actions to redress major corporate misconduct. Co-lead effort on behalf of the City of Boston and the Boston Public Health Commission in suit against major firearms manufacturers in an effort to recover the cost of gun violence to the City of Boston and its citizens. Heavily involved in extended negotiations to settle municipal gun suits on behalf of the City of Boston. Engaged in the litigation of several suits against major pharmaceutical manufacturers for illegal activities that artificially inflate the price of prescription drugs paid by consumers.

> Law Offices of Edward Notargiacomo, Boston, MA

Primary focus in civil litigation, including construction and contract claims, employment disputes as well as some personal injury. Represented clients in commercial and residential real estate conveyancing as well as advised clients on land use and zoning issues. Experience with mediation, arbitration and

of COUNSEL Ed Notargiacomo

negotiation and settlement of a wide range of disputes. Drafted and negotiated contracts, commercial leases and settlement agreements. Provided aggressive representation to clients in construction and contract disputes, copyright actions, zoning and land use matters, and commercial and residential lease disputes.

> Brown, Rudnick, Freed & Gesmer, P.C., Boston, MA

Experience in real estate conveyancing and finance, including representation of international investment funds seeking to acquire investment grade commercial property in the United States. Provided legal representation in a wide range of practice areas including real estate development and complex real estate finance, zoning regulations, and commercial lease negotiation. Two years concentrating in commercial litigation, representing a wide range of business clients in state and federal courts.

PUBLICATONS

> Boston University Public Interest Law Review, 1994

NOTABLE CASES

- > In re Relafen Antitrust Litigation (\$85 million settlement)
- > In re Lupron Marketing and Sales Practices Litigation (\$150 million settlement)
- > In re Pharmaceutical Manufacturers Average Wholesale Price Litigation (\$300 million in settlements)
- > State of Connecticut v. Eli Lilly (\$25 million settlement)
- > Pfizer Neurontin Promotions Litigation (jury verdict and judgment for \$142 million)
- > In re Wellbutrin SR Antitrust Litigation
- > In re Vytorin/Zetio Marketing, Sales Practices and Products Liability Litigation
- > In re Flonase Antitrust Litigation

PERSONAL INSIGHT

Ed once had a one-on-one lunch with Cher while working as an investigator for the public defender's office in Washington, D.C. Cher was researching her role as a public defense attorney in the movie Suspect. He also once owned a pot-bellied pig who could sit, play dead and turn in a circle on command (and for a tasty treat).

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YEARS OF EXPERIENCE

PRACTICE AREAS

> Antitrust Litigation

- Racketeering
- > Pharmaceutical Fraud

BAR ADMISSIONS

- > Washington
- > New York
- > District of Columbia

CLERKSHIPS:

- > The Hon. Louis F. Oberdorfer, U.S. District Court for D.C.
- > U.S. Senate Judiciary Committee (Sen. Leahy) Washington, D.C.

EDUCATION

- > University of California,
 Berkeley School of Law (Boalt Hall), J.D., May 2002; top 15%
 of graduating class
- Johns Hopkins University, School of Advanced International Studies
 (SAIS) M.A. in International Economics and International Relations, December 1997, Graduated with distinction (top 10%)
- > Brown University A.B. in International Relations, May 1995, magna cum laude

Jerrod C. Patterson

Served as federal prosecutor for over nine years, prosecuting tax cases, fraud, and other financial crimes. Extensive experience trying complex cases to verdict.

CURRENT ROLE

> Of Counsel, Hagens Berman Sobol Shapiro LLP

> Mr. Patterson brings to the firm extensive trial experience and a history of prosecuting complex fraud cases, including tax fraud, bank fraud, wire fraud, money laundering and prescription fraud.

RECOGNITION

- > FDA Commendation Award 2013
- > Organized Crime and Drug Enforcement Task Force "Best Financial Investigation in the Nation" 2012
- > IRS "Outstanding Contribution Award" 2011
- > U.S. Attorney General "Outstanding Performance as a Special Assistant U.S. Attorney" 2010
- > Assistant Attorney General "Outstanding Tax Division Attorney" 2009
- > Assistant Attorney General "Outstanding Tax Division Attorney" 2008

NOTABLE CASES

> Led or co-chaired 11 federal criminal jury trials, one local jury trial, and 22 bench trials.

EXPERIENCE

- Prior to joining Hagens Berman, Mr. Patterson served as an Assistant United States Attorney at the U.S. Attorney's Office in Seattle, WA.
 - Prosecuted complex fraud cases, including tax fraud, bank fraud, wire fraud, money laundering, and prescription fraud
 - Served as Project Safe Childhood Coordinator; led efforts to investigate and prosecute child pornography and child exploitation cases
 - Led prosecution of large-scale drug trafficking organizations, including cartels and street gangs, to interdict drug smuggling and investigate money laundering
- > Trial Attorney, U.S. Department of Justice Washington, D.C., Tax Division, Northern Criminal Enforcement Section
 - Co-chaired prosecution of two defendants, in separate trials, for scheme to defraud the Cleveland Catholic Diocese
- > Special Assistant U.S. Attorney, U.S. Attorney's Office for D.C. Nov. 2006 May 2007
 Prosecuted 22 bench trials in Sex Offense/Domestic Violence Section
- > Associate, Wilmer Cutler Pickering (WilmerHale)

Jerrod C. Patterson

PERSONAL INSIGHT

Although not a Washington state native, Mr. Patterson has quickly adopted Seattle as his hometown. In his spare time, he and his family enjoy the local wineries, lakes and hiking trails.



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YEARS OF EXPERIENCE > 19

PRACTICE AREAS

- > Complex Commercial
- > Intellectual Property
- > Patent Litigation
- > Trademark and Trade Dress Infringement
- > Trade Secret Misappropriation

BAR ADMISSIONS

- > California
- > Arizona
- > Massachusetts

COURT ADMISSIONS

- > U.S. Court of Appeals, Federal Circuit
- > U.S. Court of Appeals, Ninth Circuit
- > U.S. Court of Appeals, First Circuit
- > U.S. District Court, Central District of California
- > U.S. District Court, Northern District of California
- > U.S. District Court, Eastern District of California
- > U.S. District Court, Southern District of California
- > U.S. District Court, District of Arizona

Greer N. Shaw

Greer works hard for every client, large and small, with integrity and creativity.

CURRENT ROLE

> Of Counsel, Hagens Berman Sobol Shapiro LLP

RECOGNITION

> Southern California Super Lawyers®, Intellectual Property Litigation, 2014-2016

EXPERIENCE

- > Snell & Wilmer LLP, 2011-2015
- > Graves & Shaw LLP, 2009-2011
- > Kirkland & Ellis LLP, 2004-2009
- > Goodwin Procter LLP, 1998-2003
- > U.S. Court of Appeals, First Circuit, 1997-1998

LEGAL ACTIVITIES

- > Intellectual Property Owners Association; Litigation Committee (2014-2015)
- > Los Angeles Intellectual Property Law Association; Board of Directors (2012-2015)
- > USC Intellectual Property Institute; 2015 Planning Committee
- > The Judge Paul R. Michel Intellectual Property American Inn of Court; Reporter (2008-2009), Team Captain (2009, 2012); Program Chair (2012-2014)

> American Intellectual Property Law Association

PRESENTATIONS

- > "Nautilus, Ariad, and Beyond; The Current State of § 112's Definiteness, Enablement, and Written Description Requirements in Litigation and Prosecution," Co-Presenter, Webinar produced by the State Bar of California, Patent Interest Group (March 18, 2015)
- > "LAIPLA Goes to Court Settlement of IP Disputes," Moderator (with Hon. George Wu, Hon. Gary Feess (Ret.) and Hon. Suzanne Segal, U.S. District Court, Central District of California), presented by the Los Angeles Intellectual Property Law Association (January 13, 2015)
- > "Careers in Intellectual Property and Entertainment Law," Panelist, sponsored by the Los Angeles Intellectual Property Law Association and Pepperdine University School of Law (October 1, 2014)
- > "Intellectual Property: It's Not Just for Specialists Anymore," Co-Presenter, Association of Corporate Counsel (Southern California Chapter), Long Beach, CA (June 19, 2014)

of counsel Greer Shaw

- > U.S. District Court, District of Massachusetts
- > U.S. District Court, District of Nebraska
- > U.S. District Court, Eastern District of Texas

CLERKSHIPS:

> Honorable Bailey Aldrich, United States Court of Appeals for the First Circuit

EDUCATION

- Boston University School of Law, J.D., magna cum laude; Managing Editor, Boston University Law Review
- > University of California, Berkeley, B.A.

- > "Hot Topics for In-House Patent Practitioners," Moderator, "Washington in the West 2014" conference, presented by Los Angeles Intellectual Property Law Association (January 24, 2014)
- > "Hot Topics and Notable Developments in IP Law," Co-Presenter, Association of Corporate Counsel (Mountain West Chapter), Salt Lake City, UT (June 28, 2013)
- > "Design Patent Infringement 2013," Co-Presenter, Webinar produced by The Knowledge Group, LLC (January 29, 2013)
- > "Litigating Patents in the Central District: Local Practices and the Patent Pilot Program from the Practitioner's Perspective," Moderator, Litigation Roundtable, Los Angeles Intellectual Property Law Association, Los Angeles, CA (May 30, 2012)
- > "U.S. Patent Litigation Involving Pharmaceutical Patents," Co-Presenter, Taiwan Medical and Pharmaceutical Industry Technology and Development Center, Taipei, Taiwan (May 25, 2012)
- > "Washington in the West Conference," Chairperson, sponsored by Los Angeles Intellectual Property Law Association (February 14, 2012)
- > "Dual Actor Infringement: Drafting and Enforcing Telecommunication and Computer Science Claims Following BMC, Muniauction, SiRF and Akamai," Panelist, Los Angeles Intellectual Property Law Association, 2011 Spring Seminar (June 4, 2011)
- "IP Law Where Do I Fit In?," Panelist, Sponsored by The Palmer Center, the Los Angeles Intellectual Property Law Association, and the Pepperdine University Career Development Office (October 28, 2008)
- > "Patents & The Supreme Court," Moderator, Panel presentation of the 10th Annual "Washington in the West" Conference presented by the Los Angeles Intellectual Property Law Association (January 31, 2007)
- > "Recent Developments In False Designation of Origin and Willful Patent Infringement," Panelist, Fifth Annual Technology Law Conference, Pepperdine University School of Law, Sponsored by the Association of Corporate Counsel (June 25, 2004)

PERSONAL INSIGHT

When he is not helping clients who have been ripped off or wrongly accused, Greer enjoys scaling mountains, exploring canyons, and rappelling down waterfalls with the Altadena Mountain Rescue Team of the Los Angeles County Sheriff's Department.



(206) 268-9329 office (206) 623-0594 fax jeffs@hbsslaw.com

YEARS OF EXPERIENCE

PRACTICE AREAS

> Antitrust Litigation

/ Annu dot Enigation

- BAR ADMISSIONS
- > Washington
- > District of Columbia

EDUCATION

- > University of Michigan, B.A., magna cum laude, 1981
- > University of Chicago Law School, J.D., 1984

Jeffrey T. Sprung

Mr. Sprung led the fight to pass laws in Washington rewarding whistleblowers for recovering taxpayer money stolen by private companies, resulting in the 2012 enactment of the Washington Medicaid Fraud False Claims Act.

CURRENT ROLE

> Partner, Hagens Berman Sobol Shapiro LLP

- > Specializes in government fraud *qui tam* suits brought under the False Claims Act, representing whistleblowers serving as private Attorneys General
- > Key expertise in prosecuting antitrust class actions involving claims of price-fixing
- \$120 million recovered for purchasers of oriented-strand board
- \$139 million recovered for purchasers of polyether polyols
- > Key expertise in prosecuting cases against pharmaceutical manufacturers and national health care companies for health care fraud; a major bank for fraud in the securitization of mortgage loans; an ambulance company that resulted in what at the time was the second-largest recovery in the ambulance industry's history; a big-four accounting firm for defrauding the U.S. Department of Justice; contractors for the U.S. Department of Energy concerning accounting fraud at the nuclear clean-up site in Hanford, Washington; and military contractors for procurement fraud

EXPERIENCE

- > Assistant U.S. Attorney, U.S. Attorney's Office for the District of Columbia
 - Specialized in civil fraud matters
 - Won first civil suit for mail, wire and bank fraud brought in the District of Columbia, the first civil suit brought by the government to punish insider trading in the mortgage-backed securities market

LEGAL ACTIVITIES

- > Presented on the False Claims Act to various law schools, including the University of Washington School of Law, and at meetings of Seattle and national bar associations
- > Past editor and contributing author of a leading practitioners' guide on civil legal remedies in United States courts for hate crimes
- > Current board vice president of Planned Parenthood Votes Northwest
- > Past president of Seattle non-profit the Kavana Cooperative
- > Member of the Washington Progress Alliance

PRESENTATIONS

- > "How To Represent Whistleblowers Under Washington's New Qui Tam Law," Washington State Association for Justice, May 2012
- > Testimony before the Judiciary Committee of the Washington State House of Representatives on House Bill 2246, Proposed Washington State Medicaid Fraud False Claims Act, January 2012
- > Testimony before the Health and Long Term Care Committee of the Washington State Senate on Senate Bill 5978, Proposed Washington State Medicaid Fraud False Claims Act, December 2012

of counsel Jeffrey T. Sprung

- > Testimony before the Judiciary Committee of the Washington State House of Representatives on Proposed Washington State Medicaid Fraud False Claims Act, December 2012
- > "What To Say If A Whistleblower Calls," WSAJ Roundtable, November 2011

PUBLICATIONS

- > "State could recoup millions under Fraud False Claims Act," The Olympian, March 2012 <u>download »</u>
- > "'Obamacare' is constitutional. But will the Supreme Court care?," Crosscut.com, September 2011) <u>download »</u>
- Striking Back At Bigotry: Remedies Under Federal and State Law for Violence Motivated by Racial, Religious, and Ethnic Prejudice," National Institute Against Prejudice & Violence, 1986

NOTABLE CASES

> Amgen

Whistleblower played a key role in uncovering an alleged illegal scheme organized by pharmaceutical giant Amgen. The whistleblower, a research scientist and medical doctor, alerted authorities that Amgen was manipulating the scientific record regarding two of its blockbuster drugs, triggering prescriptions for off-label uses of the drugs. (\$762 million recovered)

> Sound Physicians

Brought on behalf of former regional vice president of operations for Sound Physicians, a leading provider of primary care physicians. Whistleblower claimed that Sound senior management was aware of significant upcoding of patient bills, causing Medicare to overpay for services by tens of millions of dollars. (\$14.5 million settlement)

> Oriented Strand Board

Suit alleged that the manufacturers of oriented strand board (OSB) conspired in violation of federal antitrust law to restrict the supply of OSB structural panel products and raise prices. (\$120.7 millions settlement)

> Polyether Polyols

Complaint alleged that the defendant manufacturers unlawfully agreed to fix, raise, maintain, or stabilize the prices of, and allocate the customers and markets for, Polyether Polyol Products sold in the United States and its territories between Jan. 1, 1999 and Dec. 31, 2004, in violation of the federal antitrust laws. The case is ongoing, with settlements to date of \$139.3 million. In May 2013, after trial, Dow Chemical Co. was ordered to pay \$1.2 billion in damages. That order is currently on appeal.



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YEARS OF EXPERIENCE

/ 2 7

PRACTICE AREAS

> Human Rights

- > Environmental Protection
- > Consumer Rights

BAR ADMISSIONS

- > Washington State Bar Association
- > Australian State Bars including Victoria, NSW, and WA
- > Supreme Court of Papua New Guinea

EDUCATION

> University of Melbourne

of COUNSEL Nick Styant-Browne

Served as lead counsel in the trial against Australia's major newspaper publishers, including "News," which resulted in the deregulation of the system of distribution of newspapers and magazines throughout Australia.

CURRENT ROLE

- > Of Counsel, Hagens Berman Sobol Shapiro LLP
- > Practiced class-action and multi-plaintiff litigation since 2001
- > Current projects include Rio Tinto Litigation for human rights and environmental abuses at the Panguna mine on the Pacific island of Bougainville
- > Has been lead counsel in both bench and jury class action trials in Federal Court

EXPERIENCE

> Senior partner (one of five) at Australia's largest plaintiff law firm working on class actions, environmental litigation and antitrust litigation

LEGAL ACTIVITIES

> Past elected member, Council of Greenpeace, Australia

NOTABLE CASES

Served as co-counsel on Australia's then-largest class action against a wholly owned subsidiary of Exxon, arising out of a gas plant explosion which shut down the gas supply to Melbourne and most of the State of Victoria for 10 days

> Rio Tinto Litigation

Mr. Styant-Browne's practice has involved several projects in the Pacific Rim, acting principally on behalf of the indigenous peoples of poor developing Pacific nations claiming environmental and human rights abuses. His successes and passion for the causes of indigenous peoples have led to him being retained by the national governments of Pacific States including Tuvalu and the Kingdom of Tonga

> BHP Environmental Litigation

Mr. Styant-Browne's meticulous outlining of the environmental devastation caused by the Ok Tedi mine in Papua New Guinea helped force mining companies adopt stricter environmental standards in developing countries

- > Toyota Unintended Acceleration Litigation
- > Thalidomide Drug Litigation

of COUNSEL Nathaniel A. Tarnor

Mr. Tarnor has litigated a wide variety of legal matters and takes pride in pursuing justice on behalf of his clients for as long as it takes to win.

CURRENT ROLE

- > Of Counsel, Hagens Berman Sobol Shapiro LLP
- > Represents American terrorism victims against Chiquita Brands International for violations of U.S. antiterrorism laws in Columbia
- > Practice concentrates on complex federal litigation

EXPERIENCE

- > Milberg LLP, New York, NY, 2009-2016
- > Practice areas include antitrust, class actions, consumer protection, contractual disputes, securities and whistleblower representation in conjunction with the U.S. Department of Justice and the U.S. Securities & Exchange Commission
- > Pro Bono: Represented families of American terrorism and torture victims before the U.S. Supreme Court and Second Circuit.
- > Previously provided legal assistance to human rights victims from around the world in conjunction with other prominent law firms.

RECOGNITION

- > Chicago-Kent International Law Moot Court Honor Society, 2002-2004
- > Captain, Chicago-Kent International Law Moot Court Team, 2002-2004
- > Highest Oralist Score 2003 Philip C. Jessup International Law Moot Court Regional Competition Chicago-Kent Moot Court Team

> CALI Award Commercial Payment Systems Law

PERSONAL INSIGHT

Nathaniel enjoys competing in endurance sports and hiking with his family.

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YEARS OF EXPERIENCE

> 12

BAR ADMISSIONS

- > State of Illinois
- > State of New York

> District of Columbia

PRACTICE AREAS

- > Antitrust Litigation
- > Anti-Terrorism
- Consumer Rights
- > Investor Fraud
- > Whistleblower Litigation

COURT ADMISSIONS

- > U.S. Supreme Court
- > U.S. Courts of Appeals for the 2nd and 7th Circuits, and for the District of Columbia
- > U.S. District Court for the District of Columbia
- > U.S. District Courts for the Northern & Central Districts of Illinois
- > U.S. District Court for the Eastern & Southern District of New York

EDUCATION

- > Chicago-Kent College of Law, J.D., CALI Award, 2004
- > University of Illinois, B.A., Phi Beta Kappa, summa cum laude, Milton Ravoke Award, 2000



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YEARS OF EXPERIENCE

PRACTICE AREAS

> Consumer Protection

BAR ADMISSIONS

> Washington

- > U.S. Court of Appeals, Ninth Circuit
- > U.S. District Court, Western District of Washington
- > U.S. District Court, Eastern District of Washington

EDUCATION

- > Pepperdine University, School of Law J.D., cum laude, 2008
- Pepperdine University, Editorin-Chief, Journal of Business, Entrepreneurship & The Law
- > University of Southern California, B.A. with honors, cum laude, 2005

Ashley A. Bede

Ms. Bede has successfully secured recoveries for clients in high-profile complex class actions, focusing on antitrust, consumer protection, and sports litigation.

CURRENT ROLE

> Associate, Hagens Berman Sobol Shapiro LLP

> Focuses on antitrust, consumer protection, and sports litigation

NOTABLE CASES

- > In re Electronic Books Antitrust Litigation, successfully represented e-book consumers against Apple Inc. and other publishers for fixing the price of e-books, resulting in a \$400 million settlement.
- In re NCAA Grant-In-Aid Antitrust Litigation, representing college athletes against the NCAA and Division I Conferences, claiming these entities violated antitrust laws to cap the value of athletic scholarships far below what the free market would support.
- > Animation Workers Antitrust Litigation, representing animators and other artistic workers against Pixar, Lucasfilm entities, The Walt Disney Company, Sony Pictures entities, and others, alleging these companies have conspired to restrain competition to deprive thousands of animators and other works of better compensation.

RECENT SUCCESS

- > Part of a team that recently secured a settlement requiring Apple, Inc. to pay consumers \$400 million for its involvement in an alleged price-fixing scheme with e-books publishers.
- > Ms. Bede was the key drafter of an amicus curiae brief in the Ninth Circuit Court of Appeals case McCormack v. Hiedeman in September 2012, on behalf of Legal Voice and other organizations. The Ninth Circuit adopted her analysis and research directly into its published opinion.

EXPERIENCE

- > Associate, Perkins Coie LLP, 2008-2013
- > Judicial Extern, United States Ninth Circuit Court of Appeals for the Hon. Arthur Alarcón
 - > Summer Associate, Ryan, Swanson, & Cleveland LLP
 - > Extern, Los Angeles County District Attorney's Office
 - > While in law school, Ms. Bede was the Editor-In-Chief of the Journal of Business, Entrepreneurship & the Law; the 2008 National Champion in the American Bar Association Labor and Employment Advocacy Competition; and received multiple academic scholarships.

LEGAL ACTIVITIES

- > Committee Member, Diversity & Community Committee, University Prep Academy
- > Member, Mother Attorneys Mentoring Association of Seattle
- > Past President and past Vice President, Board of Directors, Eastside Legal Assistance Program
- > Active pro bono practice, including repeated successful representation of domestic violence survivors in obtaining protection orders and dissolutions
- > Coach of nationally competitive high school mock trial team

PERSONAL INSIGHT

www.hbsslaw.com

Ms. Bede was an internationally competitive springboard diver and coach, and now regularly runs marathons and half-marathons. She is also an avid sports fan, in particular college football, NFL, and NBA and WNBA.

ASSOCIATE Joshua C. Benson

CONTACT

CURRENT ROLE

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YEARS OF EXPERIENCE >13

PRACTICE AREAS

- > Intellectual Property
- > Patent Litigation

EDUCATION

- > Pepperdine University, School of Law J.D., cum laude, 2008
- > U.C. Davis School of Law, J.D. 2003, Managing Editor, Law Review
- California Polytechnic State University, B.S. in Materials Engineering, 1997

> Associate, Hagens Berman Sobol Shapiro LLP

EXPERIENCE

- > Shearman & Sterling LLP, San Francisco, CA (2005-07, 2012-15)
- > Dechert LLP, Mountain View, CA (2007-12)
- > Jones Day, Los Angeles, CA (2003-05)

PUBLICATIONS

- > "Recent Developments in the Inequitable Conduct Defense to Patent Infringement," Patent Law Institute, 2007
- > Note, "Resuscitating the Patent Utility Requirement, Again: A Return to Brenner v. Manson," 36 U.C. Davis L. Rev. 267, 2002

Case 4:13-md-02420-YGR Document 1810 Filed 05/26/17 Bage A42 of 460 SHAPIRO LLP



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BAR ADMISSIONS

> Washington

COURT ADMISSIONS

> U.S. District Court for the Western District of Washington

EDUCATION

- > WSBA Law Clerk Program, 2014
- > University of Washington, B.A. Criminal Justice, 1992

ASSOCIATE Dawn Cornelius

Ms. Cornelius is committed to protecting consumers from unfair and deceptive corporate practices, and has assisted in obtaining recoveries for homeowners, investors and protestors.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro
- > Practice focuses on class actions involving consumer-related claims, predatory lending practices, and claims on behalf of people harmed by pollution from neighboring power plants.

EXPERIENCE

- Prior to becoming an attorney, Dawn worked as a senior paralegal at Hagens Berman for 20 years, managing cases and developing extensive civil procedure experience in jurisdictions across the United States.
- > Ms. Cornelius also worked in the legal department of Mercedes Benz U.S. International, Inc. in Tuscaloosa, Alabama, and for the firm of Oven, Gwynn & Strickland in Tallahassee, Florida.

NOTABLE CASES

- > Expedia Litigation, assisted in recovering \$134 million settlement for consumers
- > Little et al. v. Louisville Gas & Electric Co.: Part of team representing residents living next to a coal-fired power plant emitting coal ash and dust containing toxic metals in violation of state regulations and federal law
- > In re Bank of America Home Affordable Modification Program (HAMP) Contract Litigation: Part of team representing homeowners to whom the defendant allegedly promised mortgage modifications as part of a federal program
- > In re Checking Account Overdraft Litigation: Part of team representing banking customers whose accounts were allegedly charged repeated overdraft fees based on the way the banks manipulated transactions
- > WTO Wrongful Arrest Litigation: assisted in recovering \$1 million and non-monetary relief for protestors

PERSONAL INSIGHT

Dawn is a native Washingtonian, an avid hiker and music buff. For years, she covered the Washington Huskies football team for a local publication and remains a passionate football fan. Dawn also spends many summer vacations on the family farm, driving tractor.



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PRACTICE AREAS

- Consumer Protection
- > Commercial Litigation
- > Privacy Rights
- > Appellate Advocacy

BAR ADMISSIONS

- > U.S. Supreme Court
- > U.S. Court of Appeals, Ninth Circuit
- > U.S. Court of Appeals, Tenth Circuit
- > U.S. District Court, District of Arizona
- > Supreme Court of Arizona

EDUCATION

- > University of Arizona Law School, J.D., Senior Managing Editor, Arizona Law Review
- > Harvard University, B.A., Classics

ASSOCIATE John DeStefano

Mr. DeStefano takes special pride in protecting the public against broad-based frauds and swindles and the corruption of honest enterprise.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on consumer and antitrust class actions as well as media and entertainment litigation

RECENT SUCCESS

- > Obtained court approval of \$400 million settlement to compensate Hyundai and Kia owners for misstatement of EPA fuel economy ratings. Settlement payments averaged \$353 for Hyundai owners and \$667 for Kia owners.
- > Obtained appellate reversal of judgment for defendant in multimillion-dollar business ownership dispute.

EXPERIENCE

- > Snell & Wilmer LLP 2009-2013
- > American Inns of Court Pegasus Scholar 2012: study of commercial, media, and privacy law with barristers and judges in the U.K.
- > U.S. District Court for the District of Arizona, Law Clerk to the Hon. Neil V. Wake 2008-2009
- > U.S. Court of Appeals for the Ninth Circuit, Law Clerk to the Hon. William C. Canby, Jr. 2007-2008

RECOGNITION

- > Super Lawyers, Rising Star: Class Action/Mass Tort 2015, 2016
- > Arizona Foundation for Legal Services & Education, Top Pro Bono Attorneys in Arizona Award 2013

NOTABLE CASES

- > In re Pre-Filled Propane Tank Antitrust Litigation
- > In re Hyundai & Kia Fuel Economy Litigation
- > Sheridan v. iHeartMedia; Sheridan v. Sirius XM and Pandora Media
- > Jim Brown v. Electronic Arts Inc.
- > In re NCAA Student-Athlete Name and Likeness Licensing Litigation
- > Antonick v. Electronic Arts Inc.
- > In re Swift Transportation Co., Inc.
- > Obtained a published reversal of a deportation order in a hotly disputed immigration appeal before the U.S. Court of Appeals for the Ninth Circuit (pro bono)
- Represented an international human rights organization as amicus curiae in the U.S. Supreme Court case Moloney v. United States, opposing the enforcement of a foreign law enforcement subpoena for confidential academic research in the U.S. (pro bono)

ASSOCIATE John DeStefano

LEGAL ACTIVITIES

- > American Association for Justice
- > Program Chair (current), Treasurer (past), Lorna Lockwood American Inn of Court
- > Volunteer Lawyers Program of Arizona

PERSONAL INSIGHT

When John's great-grandfather came from Italy to Boston, he lost his life savings to a man he met named Charles Ponzi. A century later, John takes special pride in protecting the public against broad-based frauds and swindles and the corruption of honest enterprise.



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YEARS OF EXPERIENCE

PRACTICE AREAS

> Complex Litigation

BAR ADMISSIONS

- > Washington
- > U.S. District Court, Eastern District of Washington
- > U.S. Court of Appeals, Ninth Circuit

EDUCATION

- > Lewis & Clark Law School, J.D.
- > University of Washington, B.A., Phi Beta Kappa

ASSOCIATE Steve W. Fimmel

Mr. Fimmel was a key member of the litigation team that won a judgment in Idaho Federal District Court involving claims exceeding \$400 million.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Focuses on high-value, document-intensive cases

EXPERIENCE

- > Attorney, Oles, Morrison, Rinker & Baker where he was a key member of the litigation team that won a judgment in Idaho Federal District Court involving claims exceeding \$400 million. The court sustained an unprecedented termination for default against the Lockheed-Martin Corporation for breach of contract to remediate a nuclear waste site at the Idaho National Engineering Laboratory.
- > Associate, Hanford Litigation Office in Seattle representing Hanford downwinders

NOTABLE CASES

- > LMITCO v. LMAES
- > Hanford Downwinders Litigation

PERSONAL INSIGHT

In a previous life, Mr. Fimmel was a sports anchor and reporter for KHQ-TV, Spokane's NBC affiliate. Through his senior year at the University of Washington and while attending law school at Lewis & Clark in Portland, Steve was the sports play-by-play and color broadcaster for Seattle's KCTS-TV on Seattle Sounder and Washington Husky basketball telecasts.



ASSOCIATE Rachel E. Freeman

Ms. Freeman was a member of the trial team responsible for a \$5.25 million dollar jury verdict on behalf of an Ohio plaintiff who was badly burned while trying to rescue her paraplegic son.

CONTACT

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YEARS OF EXPERIENCE

PRACTICE AREAS

> Complex Civil Litigation

> Consumer Fraud > Mass Tort

BAR ADMISSIONS

> Arizona

EDUCATION

- > Arizona State University, B.S., magna cum laude, 2007
- > Arizona State University Sandra Day O'Connor College of Law, J.D., 2011

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on complex civil litigation and nationwide class actions, including consumer fraud and mass tort
- > Ms. Freeman worked on behalf of student-athlete plaintiffs in the highly publicized cases Keller v. Electronic Arts and In re NCAA Student-Athlete Name and Likeness Licensing Litigation. The cases allege that video game manufacturer Electronic Arts, the National Collegiate Athletic Association and the Collegiate Licensing Company violated state right of publicity laws and the NCAA's contractual agreements with student-athletes by using the names, images and likenesses of the student athletes in EA's NCAA-themed football and basketball video games.

RECENT SUCCESS

> In March 2012, Ms. Freeman was a member of the trial team responsible for a \$5.25 million dollar jury verdict on behalf of an Ohio plaintiff who was badly burned while trying to rescue her paraplegic son from his burning home. The verdict is believed to be the largest in Columbiana County, Ohio history.

NOTABLE CASES

- > Keller v. Electronic Arts Inc., U.S. Court of Appeals, Ninth Circuit, Case No. 10-15387
- In Re: NCAA Student-Athlete Name and Likeness Licensing Litigation, U.S. District Court, ND Cal., Case No. 3:09-CV-01967-CW
- > Antonick v. Electronic Arts, Inc., U.S. District Court, ND Cal., Case No. 3:11-CV-01543-CRB

PERSONAL INSIGHT

Ms. Freeman spent three years as a professional NFL cheerleader for the Arizona Cardinals and traveled with the squad to Iraq, Kuwait and the United Arab Emirates to perform for troops stationed overseas.

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YEARS OF EXPERIENCE

PRACTICE AREAS

> Securities and Antitrust

Consumer Protection

BAR ADMISSIONS

- > Washington
- > New York
- > Southern District of New York
- > Eastern District of New York
- > Law Society of Upper Canada (Ontario)

EDUCATION

- York University, Osgoode Hall Law School, Senior Editor, Osgoode Hall Law Journal J.D., 2008
- Carleton University, Bachelor of Public Affairs and Policy Management, summa cum laude, 2005

ASSOCIATE Catherine Y.N. Gannon

Ms. Gannon is licensed to practice law in both the United States and Canada. Prior to joining Hagens Berman in Seattle, she worked at leading law firms in Toronto, Ontario and New York City.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on securities and antitrust matters, as well as nationwide consumer protection cases involving large corporations
- > Extensive experience working with expert witnesses, often in economic and other highly technical areas

NOTABLE CASES

- > In re MyFord Touch Consumer Litigation
- > NCAA Grants-In-Aid Gap Antitrust Litigation

EXPERIENCE

- > Weil, Gotshal and Manges LLP, New York, New York, Securities Litigation and Corporate Governance Group
- > McCarthy Tétrault LLP, Toronto, Canada, Complex Commercial Litigation Group
- > Department of Finance, Government of Canada, International Trade and Finance group with an emphasis on economic and trade negotiations at the G-20, IMF and the Paris Club

LEGAL ACTIVITIES

- > Director, Board of Directors, Eastside Legal Assistance Program (ELAP)
- > Volunteer, Legal Voice
- > Volunteer, Disability Rights Washington
- > Broad pro bono practice with an emphasis on healthcare and disability rights. Successfully served as lead counsel seeking access to specialized education programs for autistic students in the New York City public school district and has repeatedly advocated for prisoners with mental health needs.

PUBLICATIONS

- > "Designing a New Playbook for the New Paradigm: Global Securities Litigation and Regulation," (2011) Harvard Law School Forum on Corporate Governance and Financial Regulation
- > "Legal Vulnerability of Bioethicists in Canada: Is a New Era Upon Us?" (2010) 30 Health Law in Canada 132
- > "The Threat of the Oppression Remedy to Reorganizing Insolvent Corporations," (2009) Annual Review of Insolvency Law 429 (with Stephanie Ben-Ishai)

PERSONAL INSIGHT

Ms. Gannon grew up in Canada, the United States and Europe. She is fluent in French. In the past, she has provided legal work for Metropolitan Hospital of New York, Advocates for Children of New York and The Innocence Project. While in law school, Ms. Gannon spent several months providing policy research and advocacy assistance for the High Court of Kenya. A seasoned backpacker, she once spent six months traveling to more than a dozen countries. She can still pack a suitcase in less than 5 minutes.

Andrew Gordon

While earning honors grades in 19 courses at Berkeley Law, Andrew worked at pro-employee and union-side law firms to honor the values that brought him to law school.

CONTACT

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BAR ADMISSIONS:

> Illinois

CLERKSHIPS:

- > Hon. Sheila Finnegan,
- Northern District of Illinois
- > Hon. Valerie P. Cooke, District of Nevada

EDUCATION:

- > B.A. with Distinction (Political Science), University of Wisconsin-Madison, 2007
- > J.D., University of California, Berkeley, 2014

CURRENT ROLE

> Associate, Hagens Berman Sobol Shapiro LLP

EXPERIENCE

- > Prior to law school, Andrew served as a legislative aide to the Wisconsin Assembly Majority Leader. He also worked as an organizer on several political campaigns.
- > Before joining Hagens Berman, Andrew had the privilege of clerking for judges of the U.S. District Courts in Reno, Nevada, and Chicago, Illinois.

PUBLICATIONS

> End Around: HIV Discrimination in the Post-Amendments Act Workplace, 36 Berkeley J. of Emp. & Lab. L. 215 (2015).

PERSONAL INSIGHT

A Wisconsin native, Andrew rarely misses an opportunity to cheer on the Badgers, Packers and the World Champion Chicago Cubs. When not working to vindicate the rights of the firm's clients, Andrew likes to stay active. He is a Boston-qualifying marathon runner and, in 2013, biked from San Francisco to Los Angeles to raise funding for HIV treatment and prevention. Andrew also enjoys clipping in at SoulCycle, playing in the Stonewall Kickball and Dodgeball leagues, and travel.

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Anthea D. Grivas

Working on behalf of consumers, continuing a long-standing dedication to public interest legal advocacy.

CONTACT

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YEARS OF EXPERIENCE

PRACTICE AREAS

Consumer Protection
 Anti-Trust
 Civil and Human Rights

BAR ADMISSIONS

> Washington

EDUCATION

- > University of Washington School of Law, J.D., 2001
- > University of Washington, B.A. Political Science, 1995

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Significant complex multi-party litigation experience with an emphasis on anti-trust price-fixing, product liability and nationwide class action cases on behalf of consumers. Ms. Grivas develops successful litigation theories and strategies, drafts legal motions and handles all aspects of large-scale multi-firm case discovery.
- > Ms. Grivas' contributions to the firm have included:
 - Member of In re Automotive Parts Antitrust Litigation team
 - Drafted interrogatories and discovery motions, managed multi-firm review and oversaw in-house deposition preparation in *In re Toyota Motor Corp. Sudden, Unintended Acceleration* matter
 - Extensive discovery work in an anti-trust case brought against several of the world's largest manufacturers of TFT-LCD products
 - Part of team working on class-action litigation brought by collegiate student athletes who suffered concussions/traumatic brain injuries
 - Litigation against a large, publicly traded medical waste disposal company on behalf of small businesses
 - Nationwide class-action cases brought by homeowners with catastrophic property damage claims against makers of water connectors
 - Litigation involving the world's largest fruit and vegetable company, claiming it misled consumers about its environmental record

RECENT SUCCESS

- > In re Toyota Motor Corp. Sudden, Unintended Acceleration record settlement on behalf of auto purchasers
- > In re TFT-LCD (Flat Panel) Antitrust Litigation settlement on behalf of TFT-LCD product purchasers
- > Trabakoolas v. Watts Water Technologies, Inc. settlement on behalf of customers
- > Dole Bananas settlement on behalf of local communities in Guatemala

RECOGNITION

- > Ms. Grivas has been recognized by the University of Washington's law school for her commitment to advocacy on behalf of the public interest, and was awarded the university's annual dean's list award for high scholarship.
- > Public Justice recognized the *In re Toyota Motor Corp. Sudden, Unintended Acceleration* team for its work on behalf of auto consumers.

Anthea D. Grivas

EXPERIENCE

- > Ms. Grivas has a long-standing dedication to legal advocacy on behalf of traditionally underrepresented groups. She is a former co-chair of an organization that helps prepare Violence Against Women Act self-petitions on behalf of survivors of domestic violence, has represented refugees with disabilities in INS administrative proceedings, worked as an advocate for families receiving Temporary Assistance for Needy Families benefits, and has visited womens' shelters to conduct public assistance trainings.
- > As a summer law clerk, Ms. Grivas worked on Arc of Washington vs. Quasim, a significant case brought on behalf of individuals with developmental disabilities. She was tasked with researching and constructing a legal argument against the state of Washington's claim of deliberative process privilege, and her work helped expose a state audit report containing what the Seattle Post-Intelligencer described as "damning revelations" regarding the state's limited oversight of services for disabled individuals.
- > Ms. Grivas also has a strong technical background, incorporating over a decade of electronic discovery institutional knowledge, and has seven years of experience in litigation impacting the software industry, including work in the compliance phase of US v. Microsoft.

LEGAL ACTIVITIES

- > Northwest Immigrant Rights Project
- > Solid Ground/Fremont Public Association
- > Public Interest Law Association
- > Women's Law Caucus
- > Immigrant Families Advocacy Project
- > American Civil Liberties Union of Washington
- > KCBA Neighborhood Legal Clinics program

PUBLICATIONS

> Author, "An Unreal Dream: The Impact of DNA Technology on the American Criminal Justice System," (DeNovo, XVI.IV, 2002)

NOTABLE CASES

- > Toyota Motor Corp. Sudden, Unintended Acceleration
- > In re TFT-LCD flat panel litigation
- > NCAA Concussions

PERSONAL INSIGHT

Ms. Grivas is a lifelong musician who has performed at the Northwest Folklife Festival, Northwest Orchestra Festival, the Nippon Kan theater and as principal violinist and concertmaster with a local symphony orchestra.



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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Securities Litigation
- > Antitrust Litigation> Pharmaceutical Fraud
- > Consumer Protection

BAR ADMISSIONS

> Washington

EDUCATION

- > University of Puget Sound School of Law, J.D.
- > University of Washington, B.A.

ASSOCIATE Jeffrey A. Lang

Over 10 years of experience focused exclusively on review of discovery.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Focuses on review of discovery in document intensive cases involving the firm's consumer protection, pharmaceutical fraud, antitrust and investor fraud litigation
- > 19 years of experience across a variety of practice areas
- > Focused on the review of discovery material since 2003

EXPERIENCE

- > Special project attorney, Preston Gates Ellis, where he was involved in the Microsoft Antitrust Litigation
- > Experienced in land-use, SEPA, and zoning and building compliance through his positions with Whalen & Company and the Law Offices of Dan Clawson

NOTABLE CASES

- > Microsoft Antitrust Litigation
- > E-books Antitrust Litigation
- > Average Wholesale Price Litigation
- > Oppenheimer Core Bond Fund & Champion Income Fund Litigation

PERSONAL INSIGHT

Jeff enjoys playing soccer, attending kickboxing classes, and working out.



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YEARS OF EXPERIENCE

>4

PRACTICE AREAS

> Antitrust Litigation

> Pharmaceutical Fraud

CLERKSHIPS

> Law Clerk, Staff Attorney's Office for the U.S. Court of Appeals for the Second Circuit

BAR ADMISSIONS

- > Massachusetts
- > New York
- > U.S. District Court for the District of Massachusetts
- > U.S. Tax Court
- > U.S. Court of Appeals, Third Circuit

EDUCATION

- > Brooklyn Law School, JD, magna cum laude, 2012
- > Swarthmore College, BA 2006

ASSOCIATE Kristie A. LaSalle

Ms. LaSalle graduated magna cum laude from Brooklyn Law School in 2012.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on nationwide class-action litigation against pharmaceutical companies that violate antitrust, consumer protection and anti-fraud laws.

RECOGNITION

- > Order of the Barristers
- > Scholarly Journal Writing Award
- > John P. O'Boyle Memorial Endowed Scholarship, Carswell Scholarship, Dean's Merit Scholarship, Centennial Grant

EXPERIENCE

- > After law school, Ms. LaSalle served for two years as a law clerk in the Staff Attorney's Office for the U.S. Court of Appeals for the Second Circuit, where she handled motions practice and appeals of complex class-action litigation.
- > Prior to law school, Ms. LaSalle worked as a paralegal at a large Philadelphia law firm as a member of the legal team defending a pharmaceutical fraud class action.

PUBLICATIONS

- > Author, "The Other 99% of the Expressive Conduct Doctrine: the Occupy Wall Street Movement and the Importance of Recognizing the Contribution of Conduct to Speech," 18 Tex. J. on Civ. Rights & Civ. Liberties 1 (2013)
- > Author, "A Prescription for Change: Citizens United's Implications for Regulation of Off-Label Promotion of Prescription Pharmaceuticals," 19 J.L. Pol'y 867 (2011)

PERSONAL INSIGHT

Kristie filled her spare time during undergrad as a volunteer EMT in the suburbs of Philadelphia. She spent her days studying biology and chemistry, and her nights saving lives, running red lights and parallel parking a firetruck.



Jessica R. MacAuley

Ms. MacAuley graduated cum laude from Northeastern University in 2005.

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YEARS OF EXPERIENCE

PRACTICE AREAS

- > Antitrust Litigation
- > Consumer Rights
- > Pharmaceutical Fraud

BAR ADMISSIONS

- > Massachusetts
- > District Court of Massachusetts
- > Second Circuit Court of Appeals

EDUCATION

- > Northeastern University, B.A., cum laude, 2005
- > The Pennsylvania State University, Dickinson School of Law, J.D., 2012

CURRENT ROLE

ASSOCIATE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on nationwide antitrust class actions and consumer fraud
- > Instrumental in reaching a \$98 million settlement for direct purchasers of the immunosuppressant, Prograf
- > Co-lead class counsel for direct purchasers *In re: Solodyn Antitrust Litigation*, a multi-district litigation challenging anticompetitive conduct by pharmaceutical drug makers
- > Represents health benefit providers in the Ketek class litigation, currently on appeal in the Second Circuit

RECOGNITION

> 2015 "Rising Star," Massachusetts Super Lawyers Magazine

EXPERIENCE

> During law school Ms. MacAuley was a certified legal intern for the Rural Economic Development Clinic, advising clients on Marcellus shale exploration land rights, FDA regulations for artisanal cheese makers and formation of corporate entities for dairy farmers.

NOTABLE CASES

> In re: Prograf Antitrust Litigaiton

PERSONAL INSIGHT

Jessica has long been active in social justice movements, starting in kindergarten when she led an unsuccessful boycott of Columbus Day.



CONTACT

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YEARS OF EXPERIENCE

PRACTICE AREAS

Consumer ProtectionIntellectual Property

BAR ADMISSIONS

> California

COURT ADMISSIONS

- > U.S. District Court for the Central District of California
- > U.S. District Court for the Northern District of California
- > U.S. District Court for the Southern District of California

CLERKSHIPS:

Honorable Jerome Farris of the U.S. Court of Appeals for the Ninth Circuit, 2013 - 2014

EDUCATION

- > Harvard Law School; 2013; magna cum laude
- > Duke University; 2005; *magna cum laude*

ASSOCIATE Rio Pierce

A magna cum laude graduate of Harvard Law School, Rio focuses his practice on ensuring fair and free markets for the benefit of consumers.

CURRENT ROLE

> Associate, Hagens Berman Sobol Shapiro LLP

RECENT SUCCESS

> Achieved favorable settlements for group of 80 tenants in tort suit against landlords for slum housing conditions.

RECOGNITION

- > Chayes Fellow, National Prosecuting Authority in Cape Town, South Africa
- > Teaching Fellow, Copyright EdX

EXPERIENCE

- > Prior to joining Hagens Berman, Mr. Pierce worked as an associate for two years at Munger, Tolles & Olson, where he gained significant experience in class action and complex commercial litigation. Mr. Pierce also did extensive pro bono work on immigration matters.
- > Law Clerk, U.S. Court of Appeals for the Ninth Circuit, Judge Jerome Farris, 2013 2014
- > Associate, Munger Tolles & Olson, 2014 2016

LEGAL ACTIVITIES

> American Association for Justice

PUBLICATIONS

> "A Heavy Hand or A Light Touch: What Force Will California's Anti-SLAPP Statute Have After Baral v. Schnitt?" California Litigation Review, 2015

PERSONAL INSIGHT

A proud California native, Rio loves exploring the whole state, especially Big Sur. Prior to law school, Rio worked at Miramax for several years and still loves a good indie film. In his free time, Rio enjoys making pies.



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YEARS OF EXPERIENCE

> 6

PRACTICE AREAS

Consumer Protection

> Intellectual Property

BAR ADMISSIONS

- > California
- > U.S. District Court, Central District of California
- > U.S. District Court, Northern District of California
- > U.S. District Court, Southern District of California
- > U.S. District Court, Eastern District of California

EDUCATION

- > Loyola Law School, Los Angeles, J.D. 2011, Note and Comment Editor, Loyola of Los Angeles Entertainment Law Review
- > University of Chicago, M.A. 2005
- > University of Michigan, B.A., with High Honors, 2004
- > London School of Economics, General Course, 2003

ASSOCIATE Christopher R. Pitoun

Christopher R. Pitoun has focused on consumer litigation since graduating from law school and has gained broad experience representing individuals, municipalities and small businesses in all forms of complex litigation.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Practice focuses on class actions and other complex litigation

RECENT SUCCESS

- > Previous to joining Hagens Berman, Mr. Pitoun worked on a number of successful matters:
 - Represented a nationwide class of 300,000 homeowners against Viega/Vanguard Pex plumbing systems (\$68,000,000 settlement)
- Represented direct purchasers of Zometa in MDL against Novartis Pharmaceuticals (\$25,000,000 settlement)

EXPERIENCE

- > Associate, Girardi Keese, 2011-2014, where he gained extensive experience representing plaintiffs in business litigation involving copyright and trademark disputes, breach of contract claims and breach of fiduciary duty claims. He also worked on a number of nationwide class actions involving products liability matters in the pharmaceutical and construction industries.
- > Office of the Attorney General of California, Business and Tax Division, Winter 2010

LEGAL ACTIVITIES

- > American Association For Justice (AAJ)
- > Consumer Attorneys Association of Los Angeles (CAALA)

NOTABLE CASES

- > Fiat Chrysler Gear Shifter Rollaway, Litigation
- > Countrywide Financial, et al. Pretextual Appraisal Litigation
- > EZconn Corp., Litigation
- > Schneider National Carriers, Inc., Litigation

PERSONAL INSIGHT

- > Prior to attending law school, Chris taught English and French to high school students in China
- > Chris later decided to become a lawyer while marketing the film "Michael Clayton"



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YEARS OF EXPERIENCE

2 15

PRACTICE AREAS

- > Personal Injury Litigation
- > Sports Concussions
- > Social Work Negligence
- > Nursing Home/Adult Family Home Negligence
- > Daycare/School Negligence
- > Civil Rights
- > Privacy Rights
- > Consumer Protection

BAR ADMISSIONS

> Washington

> U.S. District Court, Western District of Washington

EDUCATION

- Seattle University, J.D.,
 Member, Public Interest Law
 Society, 2000
- > University of Washington, B.A., cum laude, Sociology, 1996

ASSOCIATE Shelby R. Smith

Shelby has dedicated her career to serving vulnerable victims of violent crimes.

CURRENT ROLE

- > Associate, Hagens Berman Sobol Shapiro LLP
- > Prosecutes personal injury cases and class action cases on behalf of consumers
- > Currently represents student-athletes in personal injury litigation pertaining to concussions/traumatic brain injuries suffered during sporting activities
- > Currently represents victims who have suffered severe personal injuries due to their mothers ingesting thalidomide during pregnancy in the late 1950's and early 1960's without knowing that the drug had not been approved by the FDA
- > She continues to represent victims of domestic violence and sexual assault to obtain protection orders so that their abusers cannot have any contact with them
- > Also represents crime victims who wish to keep their counseling records private during criminal Proceedings

NOTABLE CASES

- > GM Ignition Switch Recall
- > In re MyFord Touch Consumer Litigation
- > Thalidomide Drug Litigation
- > Walen v. PSU

EXPERIENCE

- > Litigation associate, Williams Kastner, where she planned and executed a civil caseload involving defense of physicians, hospitals, dentists and other healthcare providers. While at Williams Kastner, Ms. Smith developed successful litigation strategies, handled case discoveries, secured depositions, managed trial preparation, drafted and argued legal motions, and conducted voir dire and jury trials.
- > Prior to working at Hagens Berman, Ms. Smith worked for 10 years at the King County Prosecuting Attorney's Office, working on cases in a diverse set of areas, including the sexual assault, violent crime, district court, domestic violence, felony filing and special drug units. During her 10 years as a prosecutor, Ms. Smith tried over 100 felony jury trials. She spent five years in the Domestic Violence Unit and Special Assault Unit where she handled hundreds of cases involving physical and sexual abuse of children and adults.

LEGAL ACTIVITIES

Consistent commitment to pro bono work and services for victims of domestic violence and sexual assault

PERSONAL INSIGHT

Shelby Smith was born and raised in Seattle, and graduated from Garfield High School—which also boasts Quincy Jones and Jimi Hendrix as alums. She has a passion for live music and fashion, and has never met a sport she did not enjoy competing in: while raising three daughters and practicing law, Shelby plays on competitive indoor and outdoor soccer teams, and runs at least one marathon and two half-marathons every year.

ASSOCIATE Kiersten A. Taylor

Ms. Taylor joined the firm in 2016, bringing with her deep experience representing creditors in intersecting bankruptcy and multi-district litigation proceedings related to mass torts and pyramid schemes.

CONTACT

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PRACTICE AREAS

- > Personal Injury Litigation
- > Sports Concussions
- > Social Work Negligence
- > Nursing Home/Adult Family Home Negligence
- > Daycare/School Negligence
- > Civil Rights
- > Privacy Rights
- > Consumer Protection

BAR ADMISSIONS

> Massachusetts

COURT ADMISSIONS

- > U.S. Bankruptcy Court
- > U.S. District Court for the District of Massachusetts

EDUCATION

- > J.D., Harvard Law School, June 2011
- > B.A., Yale University, May 2008

CURRENT ROLE

> Associate, Hagens Berman Sobol Shapiro LLP

EXPERIENCE

> Prior to joining Hagens Berman, Ms. Taylor was an associate attorney at Brown Rudnick LLP

LEGAL ACTIVITIES

> Boston Bar Association

> Women's Bar Association

PERSONAL INSIGHT

In her spare time, Ms. Taylor enjoys staying active by running and doing yoga, as well as reading and cooking.



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YEARS OF EXPERIENCE

PRACTICE AREAS

Commercial Litigation
 Class Actions

BAR ADMISSIONS

- > District of Columbia
- Maryland
- > Washington

EDUCATION

- > University of Baltimore School of Law, Baltimore, Maryland,
- J.D. magna cum laude, 2010
- Honors: Class Rank 21/333; G.P.A. 3.68
- Honors: Highest Grade in the Class Award, Evidence
- Law Review: Staff Editor, University of Baltimore Law Review
- > University of Baltimore, Baltimore, Maryland, B.A. cum
- laude, 2005 - Major: Community Studies and Civic Engagement

ASSOCIATE Jessica Thompson

Jessica began her legal career at an AMLaw 100 firm representing Fortune-ranked corporations in antitrust, intellectual property and financial services industries. Though grateful for the intense training that those matters provided, Jessica is proud to now be working for the good guys.

CURRENT ROLE

> Associate, Hagens Berman Sobol Shapiro LLP

RECENT SUCCESS

- > Conducting internal investigations on behalf of financial services company into compliance with business conduct rules such as trade allocation and trade errors
- > Defending mobile merchandiser against consumer class actions filed throughout the country alleging unauthorized charges to cell phone customers
- > Representing health insurance providers in a multidistrict antitrust suit consolidated in the Northern District of Alabama
- > Represented chemical manufacturer in trade secret and contract case against competitor. Won temporary restraining order in Michigan state court.
- > Defended international hospitality company in contract suit challenging its national sales program

EXPERIENCE

- > Crowell & Moring LLP, Washington, D.C., Associate, 2011 2014
- > Cadwalader, Wickersham & Taft LLP, Washington, D.C., Associate, 2011
- > Howrey LLP, Washington, D.C., Litigation Associate, 2010 2011
 - > Howrey LLP, Washington, D.C., Summer Associate, 2009
- > Montgomery County State's Attorney's Office, Rockville, MD, Student Attorney, 2010

ACTIVITIES

- > Webinar: "Garden Leaves and Other Strategies to Protect Trade Secrets When Losing Employees," Crowell & Moring, March 28, 2013 - Present
- > Workshop: "Don't Sign that Yet!," Crowell & Moring, Washington, D.C., March 5, 2013 Present

PUBLICATIONS

- "The ITC Can Play a Critical Role in Combating International Trade Secret Theft," Intellectual Property Today, Jan. 20, 2012
- > Client Alerts & Newsletters:
 - "Consensus Grows as Congress Continues to Refine Its Efforts to Create a Federal Civil Cause of Action For Certain Trade Secret Theft," Regulatory Alert (May 12, 2014)
- "Federal Trade Secret Reform Continues With Two New Attempts to Improve Protection," Regulatory Alert (July 22, 2013)
- "Supreme Court Rejects Attempt by Class Action Plaintiff to Plead Around Federal Court Jurisdiction," (Mar. 22, 2013)

ASSOCIATE Jessica Thompson

PERSONAL INSIGHT

Jessica comes from a working-class Baltimore family. Though she has dutifully relearned the pronunciation of words like water (not "wooder") and wash (not "warsh"), she continues to inquire about "dem O's" and refuses to participate in the singing of "Shout" at the seventh-inning stretch. It's an abomination.

ASSOCIATE Mark Vazquez

During law school, Mark served as an editor for the DePaul Law Review, graduated from the top of his class, and earned the CALI Excellence for the Future Award in all five of his legal writing and trial advocacy courses.

CONTACT

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BAR ADMISSIONS

> Illinois

CLERKSHIPS

- > Hon. John Z. Lee, Northern District of Illinois
- > Hon. Jesse G. Reyes, Illinois Appellate Court, First District

CLERKSHIPS

- DePaul University College of Law, J.D., summa cum laude, 2012
- > Editor, DePaul Law Review
- > University of Chicago, B.A., 2006

CURRENT ROLE

> Associate, Hagens Berman Sobol Shapiro LLP

EXPERIENCE

- > Mark comes to Hagens Berman with a variety of clerkship experience, having clerked for both Judge John Z. Lee at the federal trial level and Justice Jesse G. Reyes at the state appellate level.
- > During law school, Mark served as an editor for the DePaul Law Review, graduated from the top of his class, and earned the CALI Excellence for the Future Award in all five of his legal writing and trial advocacy courses.

PUBLICATIONS

> People v. Kladis and the Illinois Courts' Treatment of Evidence Spoliation by Law Enforcement, Illinois State Bar Association Criminal Justice Newsletter, Vol. 56, No. 1 (August 2012)

PERSONAL INSIGHT

An avid musician, Mark has been playing bass and guitar for various rock, blues, jazz, and country acts since he was in grade school. You can frequently hear him alongside his father at bar association events throughout Chicago—that is, should you be able to hear anything in a crowded room full of lawyers.