

EXHIBIT 3

Counsel for Indirect Purchaser Plaintiffs

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

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

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

**This Document Relates to:
ALL INDIRECT PURCHASER ACTIONS**

**DECLARATION OF KENNETH L.
MANN, ON BEHALF OF THE ADR
OFFICE OF KENNETH L. MANN, AS
ARIZONA COUNSEL FOR
CHRISTOPHER HUNT, AZ PROPOSED
IPP CLASS REPRESENTATIVE, IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

DECLARATION OF KENNETH L. MANN AS AZ COUNSEL FOR CHRISTOPHER HUNT, AZ
PROPOSED CLASS REPRESENTATIVE, IN SUPPORT OF IPPS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ADR OFFICE OF
KENNETH L. MANN; Case No. 13-md-02420-YGR (DMR)

1 I, Kenneth L. Mann, declare:

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

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

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

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

22 (i) He educated himself and Christopher Hunt about the nature and scope of
23 the antitrust violations alleged herein; and, in keeping with his ethical obligations to his
24 client as an Arizona IPP proposed class representative, he sought to stay reasonably
25 informed and abreast of the progress of the litigation by reviewing filings herein that had
26 or reasonably appeared to have a potential positive or negative impact upon the IPP’s --
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DECLARATION OF KENNETH L. MANN AS AZ COUNSEL FOR CHRISTOPHER HUNT, AZ
PROPOSED CLASS REPRESENTATIVE, IN SUPPORT OF IPPS’ MOTION FOR AN AWARD OF
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ADR OFFICE OF
KENNETH L. MANN; Case No. 13-md-02420-YGR (DMR)

1 while at the same time, not “piling on” or “churning” unnecessary and unproductive
2 hours.

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

13 5. Attached hereto as **Exhibit B** is a billing summary of the Declarant’s 99.5 net
14 billable hours,¹ and a lodestar of \$300 per hour for the entire period of my representation,
15 for a total lodestar fee of \$29,850.00 before any enhancement, if any. The lodestar rate
16 was determined using the Declarant’s historical rate of \$300 per hour during the period
17 from the undersigned’s retention in this litigation in June 2013 after this Court’s Order
18 dated May 17, 2013 (ECF No. 194)) to February 28, 2017.² A detailed time compilation
19 is attached as Exhibit D.

20 _____
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22 ¹ /after deduction of hours by co-lead counsel for services deemed unnecessary.

23 ² /The undersigned recognizes his billing rate is much lower than his background and
24 legal experience since 1973 would suggest. Indeed, more than ten years ago, during
25 2005-2008, and even though a newcomer to Arizona at the time, his billing rate was \$350
26 per hour while primarily litigating securities fraud disputes as a new Arizonan and non-
27 equity member of Beus Gilbert, PLLC, Scottsdale, AZ). However, the ADR field has
been exceedingly competitive in metropolitan Phoenix, especially for relative
newcomers, following the Great Recession. Accordingly, because one’s overhead is
typically lower and more controllable when focusing on serving as a neutral versus a
(footnote continued)

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

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

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

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

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

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

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

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

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

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

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

10
11 Ken Mann

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

12 Kenneth L. ("Ken") Mann
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28 DECLARATION OF KENNETH L. MANN AS AZ COUNSEL FOR CHRISTOPHER HUNT, AZ
PROPOSED CLASS REPRESENTATIVE, IN SUPPORT OF IPPS' MOTION FOR AN AWARD OF
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KENNETH L. MANN; Case No. 13-md-02420-YGR (DMR)

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

DECLARATION OF KENNETH L. MANN AS AZ COUNSEL FOR CHRISTOPHER HUNT, AZ PROPOSED CLASS REPRESENTATIVE, IN SUPPORT OF IPSS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ADR OFFICE OF KENNETH L. MANN; Case No. 13-md-02420-YGR (DMR)

EXHIBIT A

RÉSUMÉ OF KENNETH L. ("KEN") MANN

ADR OFFICE OF KENNETH L. MANN

6822 North 72nd Place, Scottsdale, AZ 85250

www.reasonablemann.com

Phone: 480.789.1025 Email: ken@reasonablemann.com

OVERVIEW

- Peer Review: AV Preeminent® (www.martindale.com) ; Member, National Academy of Distinguished Neutrals (www.nadn.org); Sustaining Member, Arizona's Finest Lawyers (www.azfinestlawyers.org).
- Seasoned Mediator, Arbitrator, Court Special Master, Jury Trial and Appellate Litigator in Disputes Involving:
 - *Alleged Business and Statutory Torts, *e.g.*, Securities, Real Estate, Consumer, and Other Fraud, Wrongful Discharge/ADA/ADEA, Defamation, Tortious Interference, Legal Malpractice, Civil Theft, etc.
 - *Bankruptcy, *e.g.*, Fraudulent and Preferential Transfers, Discharge/Dischargeability, etc.
 - *Commercial Transaction Controversies and Shareholder/Partner/LLC Member Disputes.
 - *Executive Employment Contracts.
 - *Real Estate Sales, Mortgages, Leases, Sale/Leasebacks, Development, Construction, Eminent Domain, etc.
 - *Estates, Trusts, Taxes – Will, Trust and Guardianship Contests; Incapacity; Undue Influence; IRS, etc.
 - *Civil Racketeering Seizures, Forfeitures, etc.
 - *Receiverships
 - *ESI Discovery Issues
 - *Valuation Disputes on Real Estate, Businesses, Professional Practices, Buy-Sell and Redemption Agreements, etc.
- Former CPA (FL and NC) prior to law school. Audit Senior with Price Waterhouse (Miami Office), primarily on two publicly held mortgage and equity portfolio REIT's and a privately held Florida securities broker-dealer.
- More Than Fifteen Published Opinions (See "State and Federal Published Opinions" below).
- Former Certified (FL) Civil Trial & Appellate Mediator and AZ Superior Court JPT/Settlement Officer.
- Member, American Arbitration Association's Commercial Mediation Panel & FINRA's Mediation Panel, including securities industry employment disputes; Appointed to mediate 150-200 sophisticated financial disputes, *e.g.*:
 - *Alleged business, real estate & securities fraud, varied employment law disputes, alleged breach of fiduciary duty, legal malpractice, and other business torts.
 - *Consumer class action.
 - *Franchise disputes, including civil rights claim, and other contract disputes.
 - *Ad valorem taxes.
 - *Bankruptcy adversary proceedings.
 - *Real estate contracts, leases, zoning, eminent domain, etc.
 - *Estates and trusts.
 - *Insurance disputes – personal injury claims; workers' comp rate classifications, etc.
- Arbitrator, American Arbitration Association's Large, Complex Commercial Case Panel and FINRA's Arbitration Panel, including employment disputes. Appointed to over 100 complex cases, *e.g.*:
 - *Chaired five statewide insurance rate binding arbitration proceedings (Selected as the neutral chair by insurers and Florida Dept. of Financial Regulation (*fka* Dept. of Insurance).
 - *Alleged fraud, tortious interference, and other business torts.
 - *Franchise agreements.
 - *Co-owners' disputes over buy-sell agreements, valuation disputes, alleged fraud, fiduciary duty breaches, etc.
 - *Varied real estate, professional practices, & other business purchase & sale agreements and ancillary documents.
 - *Requirements contracts.
 - *Executive employment contracts.
 - *First-party and third-party insurance policy disputes, including life insurance and disability policies.
 - *ESI (electronically stored information) and other discovery disputes.
- Former Special Counsel (Litigation) For Bankruptcy Trustee.
- Transactional Law and Workout Experience.
- Expert Consulting/Testifying Witness Experience - On Legal Ethics, Legal Malpractice, and Fee Disputes.

EMPLOYMENT HISTORY

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

EDUCATION

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

LICENSURE

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

STATE AND FEDERAL PUBLISHED OPINIONS

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

PUBLICATIONS

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

PRESENTATIONS

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

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

PRIMARY PROFESSIONAL SERVICE ACTIVITIES

In Arizona:

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

In Florida:

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

PRIMARY COMMUNITY SERVICE ACTIVITIES

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

In Florida

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

EXHIBIT B

EXHIBIT B

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

ADR OFFICE OF KENNETH L. MANN

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

Categories:

- (1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review

- (8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

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

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

ADR OFFICE OF KENNETH L. MANN

[illegible]

EXHIBIT D

(REDACTED)

ADR Office of Kenneth L. Mann, Esq.
 6822 N. 72nd Place
 Scottsdale, AZ 85250
 480-789-1025
 ken@reasonablemann.com

Invoice #

281Amended

5/21/2017

Re:

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

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

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

	Total
	Payments/Credits
	Balance Due

ADR Office of Kenneth L. Mann, Esq.
 6822 N. 72nd Place
 Scottsdale, AZ 85250
 480-789-1025
 ken@reasonablemann.com

Invoice #

158Amended

5/21/2017

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

Re:

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

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

Total

Payments/Credits

Balance Due

ADR Office of Kenneth L. Mann, Esq.
 6822 N. 72nd Place
 Scottsdale, AZ 85250
 480-789-1025
 ken@reasonablemann.com

Invoice #

158Amended

5/21/2017

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

Re:

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

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

Total

Payments/Credits

Balance Due

ADR Office of Kenneth L. Mann, Esq.
 6822 N. 72nd Place
 Scottsdale, AZ 85250
 480-789-1025
 ken@reasonablemann.com

Invoice #

158Amended

5/21/2017

Re:

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

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

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

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

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174Amended

5/21/2017

Re:

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

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

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

Reflects write-off of \$480

Total	\$150.00
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Payments/Credits	\$0.00
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Balance Due	\$150.00
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177Amended

5/21/2017

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 Andrus Anderson LLP
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Re:

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 Master File No. 4:13-MD-02420 (YGR)
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Date		Hours	Rate	Amount
9/19/2014		0.7	300.00	210.00
9/23/2014	Draft proposed corrections to Cotchett's version of facts, and correspondence to client thereon	3.2	300.00	960.00
9/25/2014	Correspondence to client to circle back to inquire re status of his review	0.1	300.00	30.00
9/26/2014	Receive, preliminary review, and preliminary response to client's corrections to Cotchett's narrative draft of facts	0.4	300.00	120.00
9/28/2014	Assemble and organize relevant documents (.6); draft revised statement of relevant facts for Cotchett firm (1.7); correspondence to (.8) and from (.1) hereon	3.2	300.00	960.00
9/29/2014	Conferences with client re additional clarifications and corrections to recital of facts (1.4); emails (9) to and from Cotchett firm (2.7)	4.1	300.00	1,230.00
9/30/2014	Assemble and organize documents (originals) for shipping to Cotchett firm (.8); finalize letter to Cotchett firm thereon (.7); correspondence to client thereon (.2); ship documents and cover letter to Cotchett firm via Fedex (.2)	1.9	300.00	570.00

Reflects write-down of \$990

Total	\$4,080.00
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Payments/Credits	\$0.00
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Balance Due	\$4,080.00
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Invoice #

178Amended

5/21/2017

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

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

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Invoice #

228Amended

5/21/2017

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 Jennie Anderson(jennie@andrusanderson.co
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 ANTITRUST CLASS ACTION LITIGATION--
 Master File No. 4:13-MD-02420 (YGR)
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Date		Hours	Rate	Amount
4/28/2015	Receive and review e-mail from Demetrius Lambrinos re his need to interview [REDACTED] in re drafting answers to interrogatories (.1); conference [REDACTED] to confirm availability (.1); multiple subsequent calls and emails to and from Demetrius and [REDACTED] to coordinate mutually convenient time (.7); review key documents in prep for tomorrow's conference call (.8)	1.7	300.00	510.00
4/29/2015	Conference with Demetrius Lambrinos and [REDACTED] in re areas of inquiry on defendants' interrogatories; send several emails to Demetrius for expediency, w/key attachments that had been previously sent over the past two years, which were discussed this morning	2.4	300.00	720.00
4/30/2015	Conference with Demetrius Lambrinos and [REDACTED] in following up, clarifying and concluding [REDACTED] responses to areas of inquiry on defendants' interrogatories.	0.8	300.00	240.00

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

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Invoice #

235Amended

5/21/2017

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 Kelli Good (kelli.good@andrusanderson.com

Re:

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

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

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Invoice #

263 Amended

5/24/2017

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

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

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

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Invoice #

#270Amended

5/24/2017

Re:

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 ANTITRUST CLASS ACTION LITIGATION--
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 (ARIZONA INDIRECT PURCHASER
 CHRIS HUNT)

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

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

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

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275

1/11/2016

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

Re:

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

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

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Invoice #

288Amended

5/24/2017

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 Andrus Anderson LLP
 Jennie Anderson(jennie@andrusanderson.co
 Kelli Good (kelli.good@andrusanderson.com)

Re:

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

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

	Total
	Payments/Credits
	Balance Due

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Invoice #

281Amended

5/21/2017

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

Re:

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

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

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

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Invoice #

288Amended

5/24/2017

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 Jennie Anderson(jennie@andrusanderson.co
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Date		Hours	Rate	Amount
2/27/2016	[REDACTED]	0.1	300.00	30.00
2/29/2016	Receive and review e-mail from Krysta Pachman of Susman Godfrey posing additional inquiries for [REDACTED] re computer purchases	0.2	300.00	60.00

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

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Invoice #

295 Amended

5/21/2017

Jennie Lee Anderson, Esq.
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Re:

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

	Total
	Payments/Credits
	Balance Due

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Invoice #

351Amended

5/21/2017

Re:

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 Kelli Good (kelli.good@andrusanderson.com)

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

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

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 Kelli Good (kelli.good@andrusanderson.com

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

	Total
	Payments/Credits
	Balance Due

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 Kelli Good (kelli.good@andrusanderson.com)

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

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

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Invoice #

304Amende

5/21/2017

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 (ARIZONA INDIRECT PURCHASER
 CHRIS HUNT)

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

	Total
	Payments/Credits
	Balance Due

ADR Office of Kenneth L. Mann, Esq.
 6822 N. 72nd Place
 Scottsdale, AZ 85250
 480-789-1025
 ken@reasonablemann.com

Invoice #

304Amende

5/21/2017

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

Re:

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

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

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

EXHIBIT E

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

EXHIBIT E

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

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