

EXHIBIT 8

1 *Counsel for Indirect Purchaser Plaintiffs*

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**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 VAN BUNCH IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES ON
BEHALF OF BONNETT, FAIRBOURN,
FRIEDMAN & BALINT, P.C.**

1 I, Van Bunch, declare:

2 1. I am a shareholder of the law firm of Bonnett, Fairbourn, Friedman & Balint, P.C.
3 (“BFFB”), Counsel for Indirect Purchaser Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I
4 submit this declaration in support of IPPs’ Motion for an Award of Attorneys’ Fees and
5 Reimbursement of Expenses. I make this declaration based on my personal knowledge and if
6 called as a witness, I could and would competently testify to the matters stated herein.

7 2. My firm has served as counsel to Shawn Sellers and as counsel for IPPs throughout
8 the course of this litigation. The background and experience of BFFB and its attorneys are
9 summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

14 4. During the pendency of the litigation, BFFB performed work including, *inter alia*,
15 contributing to the formulation of Plaintiffs’ litigation strategy and case management, drafting and
16 editing written discovery, and preparing for and defending class representative Shawn Sellers’
17 deposition.

18 5. Attached hereto as **Exhibit B** is a billing summary of BFFB’s total hours and
19 lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for
20 Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead
21 counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by
22 BFFB during this period of time was 58.6, with a corresponding lodestar based on current rates of
23 \$25,757.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel,
24 and was performed by professional staff at my law firm. This summary was prepared from
25 contemporaneous, daily time records regularly prepared and maintained by BFFB.

26 6. Attached hereto as **Exhibit C** is a list of the various billing rates for each attorney
27 at my firm who has billed time in this case.

EXHIBIT A



ABOUT THE FIRM

Bonnett, Fairbourn, Friedman & Balint, P.C. is an AV rated firm of 22 lawyers. Our clients include many individuals and local businesses, as well as major national and international companies in a wide range of civil litigation in both federal and state courts.

The firm has developed a recognized practice in the area of complex commercial litigation, including major class actions and is widely regarded as the preeminent firm in Arizona representing plaintiffs in class action proceedings. Over the last twenty years, the firm has successfully handled more than 100 class action lawsuits. We have represented consumers and victims in a wide range of class action proceedings, including actions alleging antitrust claims, securities fraud, civil rights claims and consumer fraud.

Our antitrust practice includes the prosecution of class claims on behalf of direct purchasers of products as well as indirect purchaser claims. These antitrust cases include, among others, class actions against Microsoft, MasterCard, Apple Computer and sellers of products such as polyester and rubber chemicals, waste management services, financial products and other industries. In addition to our class action practice, the firm also has represented plaintiffs in individual litigation asserting antitrust claims, including Culligan International.

Bonnett, Fairbourn, Friedman & Balint has taken a leading role in numerous important actions on behalf of consumers and investors, and we have been responsible for many outstanding results that have yielded dozens of multi-million dollar recoveries for class members in Arizona and throughout the United States.

Bonnett, Fairbourn, Friedman & Balint, P.C.
2325 E. Camelback Road, Suite 300
Phoenix, Arizona 85016
Phone: (602) 274-1100
Toll Free Number: (800) 847-9094
Facsimile: (602) 274-1199

PRACTICE AREAS

CLASS ACTION

Bonnett, Fairbourn, Friedman & Balint represents consumers and investors in major class action cases in federal and state courts throughout the United States. Under the direction of Andrew S. Friedman, the firm's class action section represents plaintiff classes in the following areas:

Securities Fraud: Protects institutional shareholders and individual investors from corporate fraud and mismanagement.

Consumer Protection: Protects consumers from defective products and fraudulent marketing practices.

Antitrust: Protects individuals and businesses from price fixing, unfair business practices and other anticompetitive conduct.

Civil Rights and Employment: Protects employees and consumers against unfair practices and racial, age, gender, and other forms of discrimination.

Insurance and Health Care: Represents victims of fraud and unfair sales practices by life insurance companies and HMOs.

Tobacco: Seeks redress for fraudulent marketing of "Light" cigarettes as a less toxic version of "Full Flavor" varieties.

False Claims and Whistleblowers: Provides for awards to individuals who uncover false claims for payment submitted to the federal government.

SECURITIES

Bonnett, Fairbourn, Friedman & Balint has extensive experience in plaintiffs' class action securities cases in and out of the State of Arizona. Its attorneys have recovered substantial verdicts and settlements in various high-profile cases representing bondholders who have suffered significant losses due to the criminal activities of individuals in the securities and banking industries, including victimized investors in the Lincoln Savings scandal.

APPELLATE LITIGATION

Bonnett, Fairbourn, Friedman & Balint has extensive appellate experience at all levels of the state and federal court systems. Attorneys from the firm have appeared before the Arizona Court of Appeals, the Arizona Supreme Court, and numerous U.S. Circuit Courts. Decisions to appeal a matter are not made lightly by the firm; we carefully analyze the likelihood of a positive result for the client against the potential cost of an unfavorable outcome. Although we draw on the clerking and practical experience of many of our attorneys in making this analysis, a fully informed client is always an integral part of this process.



VAN BUNCH is a firm shareholder. Mr. Bunch's practice focuses on class action and mass tort litigation. He has represented clients in class litigation involving breach of contract, federal and state securities laws, federal and state RICO actions, deceptive insurance sales practices, environmental pollution and other consumer protection claims.

Recently, Mr. Bunch participated in the successful resolution of *In re Mingo County Coal Slurry* litigation in which several hundred West Virginia families received compensation for physical injuries, including wrongful death claims and the establishment of a medical monitoring program to help promote earlier diagnosis and treatment from the health effects of alleged exposure to coal slurry in their water supplies.

Mr. Bunch served as trial counsel in *Smith v. American Family*, a case involving the use of imitation crash parts in repair estimates for consumers in the state of Missouri, which resulted in a unanimous jury verdict of approximately \$30 million in March, 2007. The case paid tens of thousands of Missourians full compensation, with interest, for their losses.

Mr. Bunch also served as trial counsel in *Lebrilla v. Farmers Insurance Group* in Santa Ana Superior Court, which settled following a complete bench trial in 2006 resulting in readjustment of auto property damage claims for Farmers' insureds nationwide following settlement.

Mr. Bunch served as trial counsel for the investor class in the litigation arising out of the collapse of American Continental Corporation/Lincoln Savings and Loan Securities Litigation, MDL 834. The recovery achieved for investors, after several years of highly adversarial litigation and a months-long trial, exceeded \$250 million.

Mr. Bunch served as Co-Lead counsel in the MDL proceedings of *In re Polaris Aircraft Income Fund*, which resulted in a settlement valued at approximately \$110 million.

Mr. Bunch also litigated a series of cases involving the sale of so-called "vanishing premium" life insurance policies, including cases against Prudential Insurance and MetLife, which alone returned over \$3 billion to defrauded policyholders. Others included cases against New York Life, John Hancock, Equitable of Iowa, American General and more. He litigated *Manners v. American General Life Assurance Company* before Judge Nixon, which involved the sale of so-called "industrial" life insurance policies and alleged race discrimination in premium setting. He served as local counsel for the Class in the indirect purchaser anti-trust action against Brand Name Prescription Drug makers before Judge Kurtz in Davidson County Circuit Court, which returned over \$7 million in prescription drug benefits distributed through community health centers throughout Tennessee.

Mr. Bunch served as co-editor of the Class Actions and Derivative Suits Subcommittee of the ABA Section of Litigation newsletter. He actively participates in pro bono work, including Tennessee's "On-Line TN Justice" resource. He also serves on the Signal Mountain, Tennessee Planning Commission.

Mr. Bunch received his Bachelor of Arts Degree from Vanderbilt University in 1979. He received his law degree in 1984 from the George C. Taylor School of Law at the University of Tennessee, where he earned membership in the Order of the Coif. Mr. Bunch was admitted to the Bar in Arizona in 1984,

Tennessee in 1996 and West Virginia in 2007; he is admitted to practice before the U.S. District Court for the District of Arizona, U.S. District Court for the Middle District of Tennessee and U.S. District Court for the Southern District of West Virginia.

Mr. Bunch was associated with Evans, Kitchel & Jenkes, P.C., a large Phoenix law firm from 1984-1986. In 1986, Mr. Bunch joined Bonnett, Fairbourn, Friedman & Balint, P.C., where he became a shareholder in 1989.

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

ATTORNEYS

JERRY C. BONNETT, born Canton, Illinois, April 3, 1946; admitted to bar, 1973, Arizona; 1977, United States Supreme Court; U.S. Court of Appeals, Seventh, Eighth and Ninth Circuits; U.S. District Court, District of Arizona, and U.S. Tax Court. Education: University of Illinois (B.S., with highest honors, 1969; LL.M., 1974); Arizona State University (J.D., *magna cum laude*, 1973). Articles Editor, *Arizona State Law Journal*, 1972-1973. Judge Pro Tem, Arizona Court of Appeals, Division One, 1986 and 1992. Member, American Law Institute.

WILLIAM G. FAIRBOURN, born Salt Lake City, Utah, April 21, 1947; admitted to bar, 1973, Arizona; Arizona Supreme Court; U.S. District Court, District of Arizona; United States Court of Appeals, Ninth Circuit. Education: University of Utah (B.S., 1970); Arizona State University (J.D., 1973). Member: Maricopa County Bar Association (Member, Board of Directors, 1984-1986); Arizona Association of Defense Counsel (Member, Board of Directors, 1981-1989; President, 1986); American Board of Trial Advocates (President Phoenix Chapter, 1994); Fellow, American College of Trial Lawyers.

ANDREW S. FRIEDMAN, born Plainfield, New Jersey, September 26, 1953; admitted to bar, 1978, Arizona; U.S. Court of Appeals, Ninth Circuit; U.S. District Court, District of Arizona; U.S. Supreme Court. Education: University of Rochester (B.A., with high distinction, 1975); Duke University (J.D., with high distinction, 1978). Order of the Coif. Member: State Bar Committee on Civil Practice and Procedure (1980-1984); State Bar Committee on Bench-Bar Relations (1991); State Bar Bankruptcy Section; National Association of Commercial Trial Attorneys (1991-present); American Bar Association, Trial Practice Committee, Subcommittees and Class and Derivative Actions.

FRANCIS J. BALINT, JR., born Pittsburgh, Pennsylvania, January 9, 1957; admitted to bar, 1982, Virginia and District of Columbia; 1983, Arizona; U.S. District Court, Districts of Arizona and Virginia; U.S. Court of Appeals, Fourth and Ninth Circuits; U.S. Supreme Court. Education: University of Virginia (B.A., with high distinction, 1979; J.D., 1982). Former President: Arizona Association of Defense Counsel (Member, Board of Directors 1988 - 2001).

VAN BUNCH, born Chattanooga, Tennessee, April 28, 1957; admitted to bar, 1984, Arizona; 2007, West Virginia; U.S. District Court, District of Arizona. Education: Vanderbilt University (B.A., 1979); University of Tennessee at Knoxville (J.D., with high honors, 1984). Order of the Coif.

MICHAEL N. WIDENER, born Mt. Ranier, Maryland, June 10, 1950; admitted to bar, 1983, Arizona and Tennessee; United States Supreme Court; U.S. Court of Appeals, Ninth Circuit; U.S. District Court, District of Arizona. Education: University of Virginia (B.A., with distinction, 1972); University of Illinois (M.S., 1974); University of Arizona (J.D., 1982). Articles Editor, *Arizona Law Review*, 1980-1982. Law Clerk to Hon. James Duke Cameron, Supreme Court of Arizona, 1982-1983. (Certified Specialist, Real Estate Law, Arizona Board of Legal Specialization). Adjunct Professor (Land Use and Water Law), Arizona Summit Law School; Zoning Adjustment Hearing Officer, City of Phoenix.

ROBERT J. SPURLOCK, born Janesville, Wisconsin, November 23, 1954; admitted to Arizona bar, 1984; U.S. District Court, District of Arizona. Education: University of Wisconsin-Madison (B.S., with honors, 1976), Arizona State University (J.D., 1984). Law Clerk to the Honorable D.L. Greer, Arizona Court of Appeals, 1984-1985; Member: Phoenix Association of Defense Counsel; Defense Research Institute; Arizona Association of Defense Counsel; American Bankruptcy Institute. Adjunct Professor, Sandra Day O'Connor School of Law, Arizona State University.

C. KEVIN DYKSTRA, born Phoenix, Arizona, March 30, 1964; admitted to Arizona bar, 1989; U.S. Court of Appeals, Ninth Circuit; U.S. District Court, District of Arizona. Education: Northern Arizona University (B.S., 1986); California Western School of Law (J.D., 1989). Director, Arizona Association of Defense Counsel.

ELAINE A. RYAN, born Emmetsburg, Iowa, June 15, 1963; admitted to Arizona bar, 1989; Texas bar, 2008; Kansas bar, 2010; Missouri bar, 2010; Washington bar, 2010; Colorado bar, 2011; Utah bar, 2011; Idaho bar, 2011; U.S. District Court, District of Arizona; U.S. District Court, District of Eastern Michigan; U.S. District Court, District of Idaho; U.S. District Court, Western District of Wisconsin; U.S. District Court, Northern District of Illinois. Education: University of Iowa (B.S., with distinction, 1986); Duke University (J.D., 1989).

ANDREW Q. EVERROAD, born Phoenix, Arizona, August 8, 1969; admitted to Arizona bar, 1995; U.S. District Court, District of Arizona. Education: University of Arizona (B.A., 1992); University of London – Bloomsburg, 1990; Arizona State University (J.D., 1995). Law Clerk to the Honorable Thomas C. Kleinschmidt, Arizona Court of Appeals, 1995-1996.

PATRICIA N. SYVERSON, born San Diego, California, July 16, 1975; admitted to California bar, 1999; Arizona bar, 2000; U.S. District Court, Central and Southern Districts of California; U.S. District Court, District of Arizona. Education: University of California at San Diego (B.A., 1996); California Western School of Law (J.D., 1999).

KIMBERLY C. PAGE, born Washington, D.C., February 16, 1968; admitted to Georgia bar, 1993; Alabama bar, 1993; Arizona bar, 2004; U.S. District Court, Northern, Middle and Southern Districts of Alabama; U.S. Court of Appeals, Eleventh Circuit. Education: Miami University (B.A., 1990); Cumberland School of Law of Samford University (J.D., *magna cum laude*, 1993).

CHRISTINA L. BANNON, born Ames, Iowa, September 16, 1968; admitted to Arizona bar, 1995; U.S. Court of Appeals, Ninth Circuit, 1997; U.S. District Court, District of Arizona. Education: Arizona State University (B.A., *summa cum laude*, 1989); Arizona State University College of Law (J.D., *cum laude*, 1995). Associate Articles Editor, *Arizona State University Law Journal*, 1994-1995. Law Clerk to Hon. E. G. Noyes, Jr., Arizona Court of Appeals, 1995-1996.

MANFRED P. MUECKE, born Inglewood, California, August 28, 1971; admitted to California bar, 2002; U.S. District Court, Southern District of California. Education: California State University Northridge (B.A., 1996); University of San Diego (J.D., 2002); San Diego State University (M.B.A., 2009).

WILLIAM F. KING, born Phoenix, Arizona, October 21, 1978; admitted to Arizona bar, 2005; U.S. District Court, District of Arizona. Education: Rockhurst College (B.A., 2001); Creighton University School of Law (J.D., *cum laude*, 2005). Lead Articles Editor, *Creighton Law Review*, 2004-05.

TONNA K. FARRAR, born Sedalia, Missouri, April 9, 1972; admitted to Missouri bar, 1997; Kansas bar, 1998, California bar, 2005; U.S. District Court, Eastern and Western Districts of Missouri; U.S. District Court, District of Kansas; U.S. District Court, Central, Eastern, Northern and Southern Districts of California. Education: University of Missouri, Columbia (B.A. 1994); University of Missouri, Kansas City School of Law (J.D. 1997).

T. BRENT JORDAN, born Urbana, Illinois, November 21, 1967; admitted to Minnesota bar, 1993, Pennsylvania bar, 2003; U.S. District Court, Eastern District of Pennsylvania. Education: University of Illinois (B.A., B.S., *magna cum laude*, 1990); University of Minnesota Law School (J.D., *cum laude*, 1993). Judicial Clerk, U.S. Magistrate Judge Raymond L. Erickson, U.S. District Court, District of Minnesota, 1993-1995.

ANDREW M. EVANS, born Hanover, New Hampshire, September 26, 1973; admitted to Arizona bar, 2006. Education: University of Colorado at Boulder (B.S., *cum laude*, 1997); Arizona State University College of Law (J.D., 2006).

TY D. FRANKEL, born Phoenix, Arizona, November 13, 1983; admitted to Arizona bar, 2009; U.S. District Court, District of Arizona; U.S. Court of Appeals, Ninth Circuit. Education: Boston College (B.A., Dean's List, 2006); Boston College Law School (J.D., *cum laude*, 2009).

ERIC D. ZARD, born Brainerd, Minnesota, April 4, 1984; admitted to Arizona bar, 2009; U.S. District Court, District of Arizona. Education: University of Minnesota (B.S., 2006); University of Saint Thomas, Minneapolis (J.D., 2009).

KENDALL K. WILSON, born Tacoma, Washington, August 7, 1981; admitted to Arizona bar, 2009; U.S. District Court, District of Arizona. Education: Brigham Young University (B.S., 2006); Arizona State University College of Law (J.D., *summa cum laude*, 2009).

CARRIE A. LALIBERTE, born Juneau, Alaska, December 9, 1989; admitted to Arizona bar, 2015; U.S. District Court, District of Arizona. Education: Washington State University (B.S., *magna cum laude*, 2012); Arizona State University College of Law (J.D., *cum laude*, 2015).

EXHIBIT B

EXHIBIT B

In re: Lithium Ion Batteries Antitrust Litigation

REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Firm Name: Bonnett, Fairbourn, Friedman & Balint, P.C.

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
Van Bunch (P)								1.00			2.10				3.10	\$700.00	\$2,170.00
Manfred P. Muecke (A)	0.30		15.70		32.80						6.70				55.50	\$425.00	\$23,587.50
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
SUB-TOTAL	0.30	0.00	15.70	0.00	32.80	0.00	0.00	1.00	0.00	0.00	8.80	0.00	0.00	0.00	58.60		\$25,757.50
NON-ATTORNEYS																	
															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:	0.30	0.00	15.70	0.00	32.80	0.00	0.00	1.00	0.00	0.00	8.80	0.00	0.00	0.00	58.60		\$25,757.50

EXHIBIT C

EXHIBIT D

(REDACTED)

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.
ATTORNEYS AT LAW

2325 East Camelback Road, Suite 300
Phoenix, AZ 85016-3422
602-274-1100
FEDERAL TAX ID: 86-0510994

5/19/2017

Re: Lithium Ion Batteries Litigation (C/M No. 16087-0001)

For Services Rendered from June 1, 2013 through February 28, 2017 (Historical Rates)

Fee Recap

	Hours	Rate	Amount
Van Bunch	3.1	\$625.00	\$1,937.50
Manfred P. Muecke	49.7	\$425.00	\$21,122.50
Manfred P. Muecke	5.8	\$375.00	\$2,175.00
Totals	58.6		\$25,235.00

Atty	Date	Task Codes	Description	Hours	Rate	Amount
HSB	6/20/2013	11	Confer with co-counsel regarding retention issues	0.2	\$625.00	\$125.00
HSB	6/21/2013	11	Confer with co-counsel regarding case status and strategy	0.2	\$625.00	\$125.00
HSB	6/24/2013	11	Confer with co-counsel regarding case status and strategy	0.2	\$625.00	\$125.00
HSB	6/27/2013	11	Confer with co-counsel regarding retention and prosecution issues	0.2	\$625.00	\$125.00
MPM	6/27/2013	11	Correspondence (0.5) and telephone conversation (0.5) ██████████	1.0	\$375.00	\$375.00
HSB	6/28/2013	11	Confer with co-counsel regarding retention and investigation issues	0.5	\$625.00	\$312.50
MPM	6/28/2013	11	██████████	0.5	\$375.00	\$187.50
MPM	6/28/2013	11	Correspondence (0.2) ██████████ (0.3) ██████████	0.5	\$375.00	\$187.50
HSB	6/28/2013	11	Supplemental conference with co-counsel regarding retention and investigation issues	0.2	\$625.00	\$125.00
MPM	6/29/2013	1	Correspondence with ██████████ re confirmation of class products	0.3	\$375.00	\$112.50
MPM	6/29/2013	11	Evaluate and execute class representative agreement and confidentiality agreement	0.5	\$375.00	\$187.50
HSB	7/2/2013	8	Review correspondence from co-counsel attaching complaint and regarding client documentation	0.2	\$625.00	\$125.00
HSB	7/2/2013	8	Review complaint and client documentation	0.8	\$625.00	\$500.00
HSB	10/21/2013	11	Confer with co-counsel regarding case status and strategy	0.3	\$625.00	\$187.50
MPM	10/21/2013	11	Evaluate and analyze filed amended complaint with firm client named as class representative	1.2	\$375.00	\$450.00
MPM	10/22/2013	11	Evaluate and analyze draft NOA for filing	0.1	\$375.00	\$37.50
MPM	9/22/2014	11	Review and evaluate draft class rep declaration re discovery retention	0.2	\$375.00	\$75.00
MPM	9/22/2014	11	Email draft declaration ██████████	0.1	\$375.00	\$37.50
MPM	9/29/2014	11	██████████	0.6	\$375.00	\$225.00
MPM	9/29/2014	11	██████████	0.1	\$375.00	\$37.50
MPM	9/30/2014	11	Text and email correspondence with ██████████	0.2	\$375.00	\$75.00
MPM	9/30/2014	11	██████████	0.4	\$375.00	\$150.00
MPM	9/30/2014	11	Email ██████████ to Christopher Le	0.1	\$375.00	\$37.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
HSB	10/1/2014	11	Confer with cocounsel regarding plaintiff reporting issues	0.1	\$625.00	\$62.50
HSB	10/3/2014	11	Confer with cocounsel regarding status of plaintiff reporting issues	0.2	\$625.00	\$125.00
MPM	4/28/2015	3	Prepare email correspondence to [REDACTED] summarizing type of discovery requests anticipated to be discussed during call	0.2	\$425.00	\$85.00
MPM	4/28/2015	3	Evaluate interrogatories and requests for production applicable to [REDACTED]	0.5	\$425.00	\$212.50
MPM	4/29/2015	3	Exchange email with co-lead counsel regarding [REDACTED] discovery responses and outstanding documents	0.2	\$425.00	\$85.00
MPM	4/29/2015	3	Telephone conference with [REDACTED] and co-counsel regarding anticipated discovery responses and verifying documents to be produced	0.5	\$425.00	\$212.50
MPM	4/29/2015	3	[REDACTED]	1.3	\$425.00	\$552.50
MPM	4/30/2015	3	Prepare email to David Young and Carla Voigt [REDACTED]	0.2	\$425.00	\$85.00
MPM	4/30/2015	3	Evaluate submitted pictures and product info in response to discovery requests	3.4	\$425.00	\$1,445.00
MPM	5/6/2015	3	Exchange email with Carla Voigt regarding additional discovery questions concerning items [REDACTED]	0.2	\$425.00	\$85.00
MPM	5/6/2015	3	Evaluate [REDACTED] discovery materials and submissions to determine whether responsive to additional discovery questions	2.6	\$425.00	\$1,105.00
MPM	5/7/2015	3	[REDACTED]	0.3	\$425.00	\$127.50
MPM	5/8/2015	3	Exchange email with Carla Voigt regarding discovery follow up questions concerning class representative Sellers	0.2	\$425.00	\$85.00
MPM	5/11/2015	3	[REDACTED]	0.2	\$425.00	\$85.00
MPM	5/11/2015	3	Exchange email with Carla Voigt regarding draft Sellers interrogatory responses	0.3	\$425.00	\$127.50
MPM	5/11/2015	3	[REDACTED]	1.5	\$425.00	\$637.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
MPM	5/13/2015	3	Exchange email with [REDACTED] and Carla Voigt regarding signed discovery verification by [REDACTED]	0.2	\$425.00	\$85.00
MPM	5/22/2015	3	[REDACTED]	0.1	\$425.00	\$42.50
MPM	5/22/2015	3	Evaluate finalized [REDACTED] discovery responses to ensure accuracy with documents	1.1	\$425.00	\$467.50
MPM	9/15/2015	3	Correspondence with [REDACTED] and Carla Voigt re scheduling of teleconference to conduct targeted email searches per discovery requests	0.3	\$425.00	\$127.50
MPM	9/17/2015	3	Exchange email with [REDACTED] and co-counsel confirming day and time to conduct email searches for Toshiba and AT&T	0.2	\$425.00	\$85.00
MPM	9/18/2015	3	Participate in teleconference with co-counsel and [REDACTED] re email search concerning Toshiba and AT&T	0.3	\$425.00	\$127.50
MPM	11/5/2015	3	Prepare email to class representative [REDACTED] re request to review responses to defendant interrogatories and execute verification form	0.2	\$425.00	\$85.00
MPM	11/11/2015	3	Exchange email with [REDACTED] and Carla Voigt re request for verification of response to second set of interrogatories	0.4	\$425.00	\$170.00
MPM	12/15/2015	5	Exchange email with co-counsel re availability of [REDACTED] for deposition in late January 2016	0.2	\$425.00	\$85.00
MPM	12/17/2015	5	[REDACTED]	0.3	\$425.00	\$127.50
MPM	12/30/2015	5	Exchange email with Kathryn Hoek re proposed deposition dates for [REDACTED]	0.3	\$425.00	\$127.50
MPM	1/12/2016	5	Exchange email with Kathy Hoek and [REDACTED] re scheduling of deposition for first week of February	0.3	\$425.00	\$127.50
MPM	1/17/2016	5	Review deposition notice for [REDACTED] and related email to co-counsel clarifying start time	0.2	\$425.00	\$85.00
MPM	1/18/2016	5	Initial review of third amended complaint, discovery letters, and discovery submitted by Kathryn Hoek on January 13th in advance of initial deposition preparation meeting	2.4	\$425.00	\$1,020.00
MPM	1/20/2016	5	Exchange email with [REDACTED] and Trish Aquilino re scheduling of initial deposition preparation call and confirming deposition date	0.4	\$425.00	\$170.00
MPM	1/21/2016	5	Evaluate deposition prep outline, discovery responses, and documents in preparation for deposition of [REDACTED]	2.5	\$425.00	\$1,062.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
MPM	1/22/2016	5	Continued evaluation of deposition prep outline, discovery responses, and documents in preparation for deposition of ██████████	2.5	\$425.00	\$1,062.50
MPM	1/25/2016	5	Continued evaluation of deposition prep outline, discovery responses, and documents in preparation for deposition of ██████████	3.2	\$425.00	\$1,360.00
MPM	1/25/2016	5	Participate in teleconference with ██████████ and Lindsey Eccles re initial preparation for deposition	0.6	\$425.00	\$255.00
MPM	2/2/2016	5	██████████ ██████████ ██████████	1.3	\$425.00	\$552.50
MPM	2/2/2016	5	Travel from San Diego to Phoenix to attend deposition of ██████████ including preparation for same during travel	2.5	\$425.00	\$1,062.50
MPM	2/2/2016	5	██████████ ██████████ ██████████	2.1	\$425.00	\$892.50
MPM	2/2/2016	5	██████████ meeting with ██████████ to discuss deposition topics and overview of case in preparation for deposition	1.2	\$425.00	\$510.00
MPM	2/3/2016	5	Meet with class representative ██████████ prior to deposition to review anticipated topics and lines of questioning	1.2	\$425.00	\$510.00
MPM	2/3/2016	5	Attend and participate in deposition of class representative ██████████	5.8	\$425.00	\$2,465.00
MPM	2/3/2016	5	Post deposition meeting with class representative ██████████ to review completed deposition and next steps	1.3	\$425.00	\$552.50
MPM	2/3/2016	5	Return travel from Phoenix following deposition of ██████████ in San Diego	2.2	\$425.00	\$935.00
MPM	2/10/2016	11	Review proposed complaint and third amended complaint re type of lithium battery at issue to determine whether client still has standing with his products	1.2	\$425.00	\$510.00
MPM	3/1/2016	3	Exchange email with Lindsey Eccles and ██████████ regarding confirmation of discovery issues regarding whether any comparison of batteries made	0.2	\$425.00	\$85.00
MPM	3/1/2016	5	Evaluate deposition transcript of ██████████	2.0	\$425.00	\$850.00
MPM	3/1/2016	5	Exchange email with Lindsey Eccles (0.1) and ██████████ (0.2) regarding deposition transcript	0.3	\$425.00	\$127.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
MPM	3/9/2016	3	Exchange email with Krysta Pachman to confirm [REDACTED] [REDACTED] [REDACTED]	0.3	\$425.00	\$127.50
MPM	3/14/2016	3	Evaluate and review draft discovery responses and verification	0.6	\$425.00	\$255.00
MPM	3/14/2016	3	Email draft discovery responses and verification to class representative	0.2	\$425.00	\$85.00
Total Fees:				58.6		\$25,235.00

Task Codes:

- (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

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw/Pacer	\$83.90
Messenger/Delivery	
Photocopies – In House (capped at \$0.20 per copy)	\$91.60
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	\$665.90
Miscellaneous	
TOTAL:	\$841.40