

# **EXHIBIT 14**

1 *Counsel for Indirect Purchaser Plaintiffs*  
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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **OAKLAND DIVISION**

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

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

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19 **This Document Relates to:**  
20 **ALL INDIRECT PURCHASER ACTIONS**  
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**DECLARATION OF KATHERINE VAN  
DYCK IN SUPPORT OF INDIRECT  
PURCHASER PLAINTIFFS' MOTION  
FOR AN AWARD OF ATTORNEYS'  
FEES AND REIMBURSEMENT OF  
EXPENSES ON BEHALF OF CUNEO,  
GILBERT & LaDUCA, LLP**

1 I, Katherine Van Dyck, declare:

2 1. I am a partner of Cuneo, Gilbert & LaDuca, LLP (“CGL”), Counsel for Indirect  
3 Purchaser Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of  
4 IPPs’ Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses. I make this  
5 declaration based on my personal knowledge and if called as a witness, I could and would  
6 competently testify to the matters stated herein.

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

10 3. CGL has prosecuted this litigation solely on a contingent-fee basis, and has been at  
11 risk that it would not receive any compensation for prosecuting claims against the defendants.  
12 While CGL 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, CGL performed the following work:  
15 Research and preparation of various briefs and legal memoranda and assistance with discovery,  
16 including the preparation of class representative interrogatory responses, compilation of class  
17 representative documents responsive to requests for production, preparation for class  
18 representative depositions, coordination of lengthy forensic searches of class representative  
19 electronic devices, and review of documents produced by defendants.

20 5. Attached hereto as **Exhibit B** is a billing summary of CGL’s total hours and  
21 lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for  
22 Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead  
23 counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by CGL  
24 during this period of time was 381.20, with a corresponding lodestar based on current rates of  
25 \$226,436.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel,  
26 and was performed by professional staff at my law firm. This summary was prepared from  
27 contemporaneous, daily time records regularly prepared and maintained by CGL.

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DECLARATION OF KATHERINE VAN DYCK IN SUPPORT OF IPPS’ MOTION FOR AN  
AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF  
OF CUNEO, GILBERT & LaDUCA, LLP; Case No. 13-md-02420-YGR (DMR)

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

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

6           8.       Attached hereto as **Exhibit E** is a summary of the expenses CGL has incurred  
7 during the course of this litigation. CGL expended a total of \$52,392.03 in unreimbursed costs  
8 and expenses in connection with the prosecution of this case. These expenses were incurred on  
9 behalf of IPPs by CGL on a contingent basis and have not been reimbursed. The expenses  
10 reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus  
11 represent an accurate recordation of the expenses incurred.

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

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

17           Executed on May 23, 2017 at Washington, District of Columbia.

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*/s/ Katherine Van Dyck*

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Katherine Van Dyck

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**ATTESTATION**

I, Steven N. Williams, 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

# **EXHIBIT A**

**EXHIBIT A**

**CUNEO GILBERT & LADUCA, LLP**  
**FIRM PROFILE**

Civil Litigation in Federal and State Courts. General Commercial Practice. Antitrust, Civil Rights, Government Relations, Products Liability, Administrative, Securities, Labor, and Consumer law.

**ATTORNEYS**

**Jonathan W. Cuneo**, born New York, New York, September 10, 1952. Admitted to the District of Columbia Bar, 1977; New York Bar, 2006. Admitted to practice before the United States Supreme Court, 1994; United States Court of Appeals for the First Circuit, 2006; United States Court of Appeals for the Second Circuit, 2007; United States Court of Appeals for the Third Circuit, 2004; United States Court of Appeals for the Fourth Circuit, 2005; United States Court of Appeals for the Fifth Circuit, 2009; United States Court of Appeals for the Ninth Circuit, 2007; United States Court of Appeals for the Tenth Circuit, 2011; United States Court of Appeals for Eleventh Circuit, 2012; United States Court of Appeals for the District of Columbia Circuit, 1978; United States District Court for the Eastern District of Michigan; United States District Court for the Eastern District of New York, 2006; United States District Court for the Southern District of New York, 2006; United States District Court for the Northern District of New York, 2002; United States District Court for the District of Columbia, 1978. Education: Columbia University (A.B., 1974); Cornell University (J.D., 1977). Experience: Law clerk to the Honorable Edward Tamm, United States Court of Appeals, District of Columbia Circuit (1977-1978); Attorney, Office of the General Counsel, Federal Trade Commission (1978-1981); Assistant Counsel and Counsel, Subcommittee on Monopolies and Commercial Law, House Committee on the Judiciary (1981-1986); General Counsel, Committee to Support the Antitrust Laws (1986 - 2004); Legislative Counsel, National Association of Shareholder and Consumer Attorneys (1988-2004); Legislative Counsel, National Coalition of Petroleum Retailers and Service Station Dealers of America (1988-1994). Activities: Arlington County Democratic Committee (1983-1987); Board Member, Juvenile Law Center (2009- ); Board Member, American Antitrust Institute (1998 - 2009); Board Member, Violence Policy Center (1999 - 2009); Board Member, Appleseed Legal Foundation (1999-2005). Honors: Rated by Martindale-Hubbell as AV<sup>®</sup> Preeminent<sup>™</sup>; Listed in Marquis “Who’s Who in America”; Dean’s Board of Advisors, The George Washington University Law School (2012 – current); Finalist, 2006 Trial Lawyer of the Year, Trial Lawyers for Public Justice. Publications: *Judge Tamm and the Evolution of Administrative Law: The Art of Judging*, 74 GEORGETOWN L.J. 1595 (1986); *Pulling the Plug on Antitrust Law* (with Jerry Cohen), THE NATION (1987); *House Takes Up Cause of Discounters*, LEGAL TIMES, Vol X, No. 30 (1987); *Supreme Court's “Sharp” Ruling Means Higher Prices, Fewer Choices for Consumers*, MANHATTAN LAWYER (1988); Chapter, *Consumer Protection -- Federal Trade Commission*, CHANGING AMERICA: BLUEPRINTS FOR THE NEW ADMINISTRATION (edited by Mark Green) (1992); *Antitrust and Clinton: Changes on the Horizon*, THE CALIFORNIA LAWYER

(1993); *Action on Class Actions*, THE RECORDER (1997); *The Gold Train Case: Successfully Suing the United States on Behalf of a Class of Holocaust Era Victims* (with Professor Charles Tiefer), 27 CLASS ACTION REPORTS 139 (2006); THE INTERNATIONAL HANDBOOK OF PRIVATE ENFORCEMENT OF COMPETITION LAW (with Albert A. Foer) (Edward Elgar Publishing Inc., 2010). *Remediation and Deterrence: The Real Requirements of the Vindication Doctrine*, publication forthcoming (2013), publication forthcoming in George Washington Law Review. Guest Lecturer: Southwestern Law School, 1997 and 1998; numerous appearances in CLE programs in the United States and Canada; District of Columbia Judicial Conference (2007). Member: American Bar Association; District of Columbia Bar Association; American Association for Justice.

**Pamela B. Gilbert**, born New Brunswick, New Jersey, October 3, 1958. Admitted to the New York Bar, 1985 (inactive); District of Columbia Bar 1986. Admitted to practice in D.C. Education: Tufts University (B.A., *magna cum laude*, 1980); New York University (J.D., 1984). Experience: Consumer Program Director, United States Public Interest Research Group (1984-1989); Legislative Director, Executive Director, Public Citizen's Congress Watch (1990-1992; 1992-1994); Attorney, M+R Strategic Services (1995); Executive Director, Consumer Product Safety Commission (1996-2001); Chief Operating Officer, M+R Strategic Services (2001-2002). Honors and Activities: Board Member, American Antitrust Institute (2010 - ); Board Member, Center for Effective Government (2009 - ); Board Member, National Environmental Law Center (2006 - ); Board Member, Equal Justice Works (2004 - 2012). Publications: PRIVATE ENFORCEMENT OF THE ANTITRUST LAWS IN THE UNITED STATES (edited by Albert A. Foer and Randy M. Stutz), "Proposals for Reform," written with Victoria Romanenko. Member: New York Bar Association; District of Columbia Bar Association; American Bar Association; American Association for Justice; Public Justice; Consumer Attorneys of California.

**Charles J. LaDuca**, born Buffalo, New York, September 30, 1974. Admitted to the New York State Bar, 2001; District of Columbia Bar, 2002; United States Supreme Court, 2009; United States Court of Appeals for the Second Circuit, 2007; United States Court of Appeals for the Third Circuit, 2004; United States Court of Appeals for the Sixth Circuit, 2012; United States Court of Appeals for the Ninth Circuit, 2011; United States Court of Appeals for the District of Columbia Circuit, 2013; United States District Court for the Northern District of New York, 2002; United States District Court for the Western District of New York, 2004; United States District Court for the Southern District of New York, 2013; United States District Court for the District of Columbia, 2002; United States District Court for the Central District of Illinois, 2009; United States District Court for the District of Colorado, 2008; United States District Court for the Western District of Michigan, 2010. Education: George Washington University (B.A., 1996); Catholic University of America (J.D., 2000). Member: District of Columbia Bar Association (Corporation, Finance and Securities Law Section); New York State Bar Association; New York State Society.

**Joel Davidow**, born Trenton, New Jersey, July 24, 1938. Admitted to the Bar in the District of Columbia, 1965; New York Bar, 1981; Court Admissions: U.S. Supreme Court, U.S. Court of Appeals (D.C., Ninth, First and Federal Circuits), U.S. District Court, S.D. N.Y., U.S. District Court, E.D. N.Y. Education: Columbia University School of Law (LLB, *cum laude*, 1963); Princeton University, Woodrow Wilson School of Public Affairs (B.A., *summa cum laude*, 1960). Experience: Notes editor of the Columbia Law Review and the winner of the National Jessup Moot Court

Competition; Two years in the U.S. Federal Trade Commission; Fifteen years in Antitrust Division of the Department of Justice, where he eventually served as Chief of the Foreign Commerce Section and then Director of Policy and Planning; Senior antitrust partner in major New York City and Washington, D.C. law firms, representing clients from Japan, Europe, and the United States, as both plaintiffs and defendants, in antitrust, patent, and trade litigation matters; Counsel of record in numerous antitrust class actions and has briefed and argued multi-million dollar appeals before the First, Second, Seventh, Ninth and Federal Circuit courts of appeal. Publications: ANTITRUST GUIDE FOR INTERNATIONAL BUSINESS ACTIVITIES (BNA, 4th ed. 2011); PATENT-RELATED MISCONDUCT ISSUES IN U.S. LITIGATION (OUP, 2010); and numerous articles dealing with international antitrust and patent litigation topics. Adjunct Professor: George Washington University School of Law, Columbia Law School, Georgetown Law Center, American University Law School, and George Mason University Law School, where he has taught courses in antitrust, regulation, and international competition policy.

**Daniel M. Cohen**, born Detroit, Michigan, January 24, 1958. Admitted to the Florida Bar, 1989; District of Columbia Bar, 2001; Maryland State Bar, 2003; Virginia State Bar, 2010. Admitted to practice before the United States District Court for Maryland, 2002; United States District Court for the Middle District of Florida, 2003; United States District Court of District of Columbia, 2008; Eastern District of Virginia, 2010; Western District of Virginia, 2010; Southern District of Florida, 2013. Education: Ithaca College (B.A., 1981); Western New England School of Law (J.D., 1988). Experience: Criminal Defense Trial Attorney, Public Defenders Office, tried 70 jury trials, Jacksonville Florida, 1989-1999. Member: District of Columbia Bar Association (Antitrust and Consumer Law Section); Florida State Bar Association.

**Michael J. Flannery**, born January 22, 1963. Admitted to the Virginia Bar, 1991; District of Columbia Bar, 1992; California Bar, 1998; Missouri Bar, 2001. Admitted to practice before the United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Ninth Circuit; United States District Court for the Eastern District of Missouri, United States District Court for the Western District of Missouri, United States District Court for the Southern District of Illinois, United States District Court for the Northern District of Illinois, United States District Court for the Northern District of California, United States District Court for the Southern District of California, United States District Court for the Central District of California, United States District Court for the Eastern District of California, and the United States District Court for the District of Columbia. Education: University of Notre Dame (B.A., 1985); College of William and Mary Marshall-Wythe School of Law (J.D., 1991). Honors and Awards: William and Mary Law Review (1989-91); Publication of Student Note: "Abridged Too Far: Anticipatory Search Warrants and the Fourth Amendment," 32 WM. & MARY L. REV. 781 (1991) (reprinted in 14 Criminal Law Review (1992)); Teaching Assistant, William and Mary Legal Skills Program; Chief Justice, William and Mary Honor Council; Notre Dame Scholar/Edward W. Krause Academic Scholarship. Experience: Cohen, Milstein, Hausfeld & Toll, Washington, DC, 1994-1997; Milberg Weiss Bershad Hynes & Lerach, San Diego, CA, 1997-2000; Carey, Danis & Lowe, St. Louis, MO, 2000-2012.

**Matthew E. Miller**, born Queens, New York, May 16, 1966. Admitted to the Bar of the Commonwealth of Massachusetts, 1992; Louisiana Bar, 1993; District of Columbia Bar, 1994. Admitted to practice before the United States Courts of Appeals for the First Circuit, 1998, Fourth

Circuit, 2010, Ninth Circuit, 2010, Tenth Circuit, 2011, D.C. Circuit, 2012; United States District Court for the District of Massachusetts, 1994; United States District Court for the District of Columbia, 2008. Education: Tufts University (B.A., *magna cum laude*, 1988); University of Virginia (J.D., 1991). Experience: Law Clerk to the Honorable Edith Brown Clement, United States District Court for the District of Louisiana, 1991-1993; Berman, DeValerio & Pease, Boston, MA 1994-1999; sole practitioner, 1999-2008. Languages: French, Spanish.

**Alexandra C. Warren**, born Bucharest, Romania, October 9, 1977. Admitted to the New York Bar, 2003; Massachusetts Bar, 2003; Pennsylvania Bar, 2004; District of Columbia Bar, 2007. Admitted to practice before the United States District Court for the Eastern District of Pennsylvania, 2005; United States District Court for the Western District of Pennsylvania, 2007; United States District Court for the District of Columbia, 2007; United States District Court for the District of Colorado, 2008; United States District Court for the Middle District of Pennsylvania, 2009; United States District Court for the Western District of Michigan, 2010; United States District Court for the District of Massachusetts, 2012; United States Court of Appeals for the Third Circuit, 2009; United States Court of Appeals for the Fifth Circuit, 2009; United States Court of Appeals for the Ninth Circuit, 2011; United States Supreme Court, 2009. Education: Brandeis University (B.A., *cum laude*, 1999); Fordham University Law School (J.D., 2002) (Fordham Environmental Law Journal, Staff). Honors: Archibald R. Murray Public Service Award (2002); Addison M. Metcalf Labor Law Prize (2002). Experience: Law Clerk to the Honorable John E. Jones III, United States District Court for the Middle District of Pennsylvania (2002-2004); Associate, MacElree Harvey, Ltd. (2004-2006). Member: District of Columbia Bar Association; Philadelphia Trial Lawyers Association.

**William H. Anderson**, born Trenton, New Jersey, March 28, 1979. Admitted to the Pennsylvania Bar, 2004; District of Columbia Bar, 2007; United States District Court for the District of Columbia 2007; United States Court of Appeals for the District of Columbia Circuit 2009; Colorado Bar, 2013; United States District Court for the District of Colorado 2013. Education: The George Washington University (B.A., *cum laude*, 2000); American University (J.D., 2004). Honors and Awards: Super Lawyers DC Rising Star 2014 & 2015. Experience: Law clerk to the Honorable Rhonda Reid Winston, Superior Court, District of Columbia (2004-2005). Member: American Bar Association; District of Columbia Bar Association; Pennsylvania Bar Association; Public Justice Foundation. Languages: Spanish and English.

**Katherine W. Van Dyck**, born Corpus Christi, Texas, July 4, 1979. Admitted to the Texas Bar, 2004; District of Columbia Bar, 2008. Admitted to practice before the United States District Court for the Northern District of Texas, 2006; United States District Court for the District of Columbia, 2008; United States Court of Appeals for the Fourth Circuit, 2009. Education: Texas Christian University (B.A. 2001); Texas Tech University Law School (J.D., 2004). Texas Tech Law Review - Articles Editor, Outstanding Third Year Editor, Outstanding Second Year Editor (2002-2004) Experience: Law clerk to the Honorable Hayden W. Head, Jr., United States District Court for the Southern District of Texas (2004-2006); Associate, Fee, Smith, Sharp & Vitullo, LLP (2006-2007); Associate, Griffith & Wheat, LLP (2008-2012).

**Jennifer E. Kelly**, born Elmira, New York, July 7, 1975. Admitted to the Maryland Bar, 2007, District of Columbia Bar, 2008, U.S. District Court for the District of Columbia, 2012. Education:

Boston University (B.A., *cum laude*, 1997), American University (J.D., *cum laude*, 2007; highest grade designation, Wills, Trusts, & Estates). Experience: Internship, Parliament of Great Britain (1995); Internship, District of Columbia Corporation Counsel (1996); Legislative Assistant, Office of Senator Robert C. Byrd (1998-2002); American University Civil Practice Clinic (Oral Argument before the Maryland Court of Special Appeals and Maryland District Court Small Claims Trial) (2006); Associate, Bracewell & Giuliani, LLP (2007-2009) (Paralegal, 2003-2007); Volunteer Attorney, American Red Cross (2010-2011). Member: American Bar Association.

**Brendan S. Thompson**, born Buffalo, New York, February 21, 1974. Admitted to the Maryland Bar, 2008; Admitted to practice before the United States District Court for the District of Colorado, 2008; United States District Court for the Central District of Illinois, 2008; United States Court of Appeals for the Ninth Circuit, 2011. Education: University of Detroit (B.S., 1997); visiting student, George Mason Law School; University of Baltimore Law School (J.D., 2008). Experience: Student Internships: Congressman Brian Higgins (D-NY) (2007); Chambers of the Honorable LeRoy F. Millett Jr., Circuit Court for the 31st Judicial Circuit of Virginia (2006); The Commonwealth's Attorney's Office for Prince William County, Virginia (2005). Member: Maryland State Bar Association, Bar Association of Baltimore City, American Bar Association; New York State Society.

**Victoria O. Romanenko**, born Kiev, Ukraine, April 8, 1983. Admitted to the Maryland Bar, 2009; the District of Columbia Bar, 2012. Education: Catholic University, Columbus School of Law (J.D., 2009); Brandeis University (B.A., with honors, 2006). Experience: Worked at a Washington D.C. firm engaging in antitrust and telecommunications litigation (2009-2011). Law Clerk at U.S. International Trade Commission (2009) (antidumping, countervailing duties, Section 337). Law Clerk at Department of Labor (2008) (Occupation Safety and Health Division). Law Clerk at District of Columbia Office of the Attorney General (2007) (Civil Enforcement Section). Ms. Romanenko was also nominated for the 2009 Jan Jancin award upon her completion of law school. This nomination is given to the student with the highest Intellectual Property GPA in the graduating class. Publications: *Remediation and Deterrence: The Real Requirements of the Vindication Doctrine* (2013), publication forthcoming in *George Washington Law Review*; PRIVATE ENFORCEMENT OF THE ANTITRUST LAW IN THE UNITED STATES (edited by Albert A. Foer and Randy M. Stutz) (2012), Chapter, *Proposals for Reform*, co-authored with Pamela Gilbert. Ms. Romanenko has a working knowledge of Russian and French.

**Beatrice O. Yakubu**, born Melbourne, Florida, January 3, 1984. Admitted to the Maryland Bar, 2010. Education: American University, Washington College of Law (J.D. 2010); Florida State University (B.S. 2005). Experience: clerked at the United States Attorney's Office and a criminal defense firm, and worked as a Student Attorney for the Mid-Atlantic Innocence Project. Ms. Yakubu is conversational in the Yoruba language.

**Yifei Li**, born Wuhan, China, February 15, 1988. Admitted to the New York State Bar, 2013; United States Court of Appeals for the Second Circuit, 2013; United States Court of Appeals for the District of Columbia Circuit, 2013; United States Court of Federal Claims, 2013; United States District Court for the Eastern District of Michigan, 2013; United States District Court for the Eastern District of New York, 2013; United States District Court for the Southern District of New York, 2013. Education: The George Washington University Law School (LL.M., 2011); Beijing Foreign Studies

University Law School (LL.B., B.A., Scholarship Recipient, 2010). Experience: Judicial Intern to the Honorable Chief Judge Randall R. Rader at U.S. Court of Appeals for the Federal Circuit (2012-2013). Legal Intern at Federal Circuit Bar Association (2011-2012). Law Clerk at Jingtian & Gongcheng Attorneys At Law (2009). Judicial Intern at People's Court of Jiang'An District (2007). Member: New York State Bar Association; American Bar Association. Ms. Li is a native speaker of Chinese (Mandarin).

**Peter Gil-Montllor**, born Manhasset, New York, October 11, 1987. Admitted to the New York Bar, 2014. Admitted to practice before the United States District Court for the Eastern District of New York, 2015; United States District Court for the Southern District of New York, 2015. Education: Georgetown University (J.D., magna cum laude, 2013); University of Chicago (A.B., with honors, 2009). Experience: Law clerk to the Honorable Allyne R. Ross, United States District Court for the Eastern District of New York (2015-2016). Member: Federal Bar Council. Mr. Gil-Montllor is a native speaker of Spanish.

**Matthew T. Prewitt**, born Oakland, California, August 6, 1986. Admitted to the California Bar, 2013. Education: University of Michigan Law School (J.D., cum laude, 2013); Brown University (A.B., economics, 2008). Experience: Law clerk to the Honorable Thomas P. Griesa, United States District Court for the Southern District of New York (2014-2015); Associate, Orrick Herrington & Sutcliffe LLP (2013-2014). Member: American Bar Association. Mr. Prewitt is conversational in German.

#### SPECIAL COUNSEL

**Robert J. Cynkar**, born Chicago, Illinois, April 22, 1952. Admitted to the Illinois Bar, 1977; District of Columbia Bar, 1978; Virginia Bar, 1984. Admitted to practice before the United States Supreme Court and before the United States Courts of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Eighth, Eleventh, District of Columbia Circuit, and Federal Circuits. Education: Princeton University (A.B., magna cum laude, 1974); New York University School of Law (J.D., 1977) (Staff, Law Review). Experience: Associate, Fried, Frank, Harris, Shriver & Kampelman, Washington, D.C. (1977-1979); Counsel to Chairman Bob Dole, Subcommittee on Improvements in Judicial Machinery, United States Senate Committee on the Judiciary (1979-1981); General Counsel to Chairman Paul Laxalt, Subcommittee on Regulatory Reform, United States Senate Committee on the Judiciary (1981-1983); Assistant United States Attorney, Eastern District of Virginia (Criminal Division) (1983-1985); Special Assistant to Attorney General Edwin Meese (1985); Deputy Assistant Attorney General, Civil Division, United States Department of Justice (1985-1988); Associate, Shaw, Pittman, Potts & Trowbridge, Washington, D.C. (1988-1991); Partner, Shaw, Pittman, Potts & Trowbridge, Washington, D.C. (1991-1996); Founding Partner, Cooper & Kirk, Washington, D.C. (1996-2003); Partner, Egan, Fitzpatrick, Malsch & Cynkar, Vienna, Virginia (2004-2006); has tried over 25 cases in federal and state courts; has briefed numerous appeals in the majority of Federal Circuits and in State Supreme Courts, and in the U. S. Supreme Court, and personally argued many of those appeals. Sample Noteworthy Cases: *U.S. v. Fleming* (E.D.Va. 1984) (successful prosecution of a drunk driver who killed a mother of 11 for second-degree murder); *U.S. v. Winstar* (U.S. Sup. Ct. 1996) (holding that even the requirements of a broad change in regulatory policy by Congress cannot excuse the federal government's breach of contract); *U.S. ex*

*rel. Ubl v. IIF Data Solutions* (E.D. Va. 2009) (successful defense of a government contractor accused of violating the False Claims Act in a bet-the-company case); *Livingston v. Virginia Dept. of Transportation* (Va. Sup. Ct. 2012) (establishing that a damaging for public use does not need to rise to the level of a taking to qualify for just compensation under the Virginia Constitution); *Settle v. RGR*, (Prince William Cir. Ct. 2012)(over \$3 million jury award for the widow of a truck driver killed in a collision with a train). Publications: *Dumping on Federalism*, 75 U. COLO. L. REV. 1261 (2004); *The Changing Vocabulary of Administrative Law*, 43 FOOD DRUG COSM. L.J. 681 (1988); “*Buck v. Bell: ‘Felt Necessities’ v. Fundamental Values?*” 81 COLUM. L. REV. 1418 (1981). Member: District of Columbia Bar Association; Virginia Bar Association; Fairfax County Bar Association; Federalist Society.

#### OF COUNSEL TO THE FIRM

**Charles Tiefer**, born January 21, 1954. Admitted to the District of Columbia Bar. Admitted to practice before the United States Supreme Court; United States Court of Federal Claims. Education: Columbia University (B.A., *summa cum laude*, 1974), Harvard Law School (J.D., *magna cum laude*, 1977) (Member, Harvard Law Review). Experience: Law clerk, United States Court of Appeals for the D.C. Circuit (1977-1978); Trial Attorney, United States Department of Justice, Civil Rights Division (1978-1979); Assistant Senate Legal Counsel, United States Senate (1979-1984); Solicitor and Deputy General Counsel, United States House of Representatives (1984-1995); Professor of Law, University of Baltimore School of Law (1995 - ). Publications: VEERING RIGHT: HOW THE BUSH ADMINISTRATION SUBVERTS THE LAW FOR CONSERVATIVE CAUSES (U. Cal. Berkeley, 2004); GOVERNMENT CONTRACT LAW: CASES AND MATERIALS (co-author) (Carolina Academic Press, 2d ed., 2004); THE SEMI-SOVEREIGN PRESIDENCY (Westview, 1994); CONGRESSIONAL PRACTICE AND PROCEDURE (Greenwood Press, 1989); *Congress’s Transformative “Republican Revolution” in 2001-2006 and the Future of One-Party Rule*, J. L. & POL. OF U. VA. (2008); *The Iran Debacle: The Rise and Fall of Procurement-Aided Unilateralism as a Paradigm of Foreign War*, UNIV. PENN. J. INT’L ECON. LAW (2008); *Can Appropriation Riders Speed Our Exit From Iraq?* 42 STAN. J. INT’L L. 291 (2006); *The Gold Train Case: Successfully Suing the United States on Behalf of a Class of Holocaust-Era Victims*, 27 CLASS ACTION REP. 136 (2006); *Cancellation and Termination Without Forfeiture*, 54 MERCER L. REV. 1031 (2003). Member: District of Columbia Bar Association.

**David W. Stanley**, born St. Louis, Missouri, May 30, 1944. Admitted to the District of Columbia Bar, 1973; Virginia State Bar, 1972. Admitted to practice before the United States Supreme Court, 1980; United States Court of Appeals for the District of Columbia Circuit, 1978; United States District Court for the District of Columbia, 1974. Education: University of Virginia (B.A., 1966); University of Virginia School of Law (J.D., 1972). Experience: Law clerk to Honorable Gerard D. Reilly, Chief Judge, District of Columbia Court of Appeals (1972-1973). Assistant U.S. Attorney, U.S. Attorney's Office for the District of Columbia, 1973-1984 (Fraud Division, 1981-1984); Assistant Chief Trial Attorney, Division of Enforcement, U.S. Securities and Exchange Commission (1984-1987); Of Counsel, Swidler & Berlin, Chartered (1987-1992). Member: District of Columbia Bar Association (Corporation, Finance and Securities Law Section; Litigation Section); Assistant U.S. Attorneys Association (President, 1994-1995); Association of Securities and Exchange Commission Alumni; The Barristers.

**Bradford E. Kile.** Admitted to the District of Columbia Bar. Admitted to practice before the United States Supreme Court, United States Court of Appeals for the Federal, Fourth, and DC Circuits, United States District Court for the District of Columbia and Eastern District of Virginia. Registered to practice before the United States Patent and Trademark Office – Reg. No. 25,223. Education: The Ohio State University (B. Mech. Engr., 1966); The George Washington University (J.D., 1970; LL.M. 1978). Publications: *Legal ‘X-Games’ Risk: Officer and Director Passive Retention of Personal Liability for Patent Infringement*, 7 IP Litigator 11 (2001); “Lotus v. Borland-Copyright Protection of Computer Software in a State of Transition,” Copyright World, 1995. Member: American Bar Association; Fellow of the Inn – Giles S. Rich American Inn of Court; American Intellectual Property Law Association; Federal Circuit Historical Society.

# **EXHIBIT B**

**EXHIBIT B****IN RE: LITHIUM ION BATTERIES INDIRECT  
TIME REPORT- MONTHLY****Firm Name: Cuneo Gilbert & LaDuca, LLP****Reporting Period: June 1, 2013 - February 28, 2017****Categories:**

(1) Investigations, Factual

(2) Drafting Discovery Requests

(3) Drafting Discovery

(4) Deposition Taking

(5) Deposition Defending

(6) Discovery Meet &amp; Confer

(7) Document Review

(8) Drafting Pleadings, Briefs &amp; Pretrial Motions

(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.

(10) Class Certification/Experts

(11) Litigation Strategy, Analysis &amp; Case Management

(12) Negotiating Settlements

(13) Trial and Trial Preparation

(14) Court Appearance and Prep

(A) Associate

(LC) Law Clerk

(PL) Paralegal

(L) Librarian

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Jonathan Cuneo (P)			12.00					7.00			25.80	0.50			45.30	\$895	\$40,543.50	45.30	\$40,543.50
Pamela Gilbert (P)											0.50				0.50	\$575	\$287.50	0.50	\$287.50
Joel Davidow (P)				10.50				13.50			7.50				31.50	\$895	\$28,192.50	31.50	\$28,192.50
Matthew Miller (P)	6.50														6.50	\$775	\$5,037.50	6.50	\$5,037.50
Sandra Cuneo (P)							3.30				1.70				5.00	\$725	\$3,625.00	5.00	\$3,625.00
							37.00								37.00	\$350	\$12,950.00	37.00	\$12,950.00
Daniel Cohen (P)			4.50	14.00				7.00	2.50		44.00	12.00			84.00	\$695	\$58,380.00	84.00	\$58,380.00
							88.00								88.00	\$350	\$30,800.00	88.00	\$30,800.00
William Anderson (P)											1.00				1.00	\$650	\$650.00	1.00	\$650.00
Katherine Van Dyck (P)	2.50	6.60			1.80					18.70	5.30	1.30			36.20	\$650	\$23,530.00	36.20	\$23,530.00
Jennifer Kelly (P)					0.10	0.50		2.50			10.30				13.40	\$575	\$7,705.00	13.40	\$7,705.00
Evelyn Li (P)											0.30				0.30	\$550	\$165.00	0.30	\$165.00
Julie Sorenson (A)							27.00								27.00	\$500	\$13,500.00	27.00	\$13,500.00
<b>SUB-TOTAL</b>	<b>9.00</b>	<b>6.60</b>	<b>16.50</b>	<b>24.50</b>	<b>1.90</b>	<b>0.50</b>	<b>152.00</b>	<b>33.30</b>	<b>21.20</b>	<b>0.00</b>	<b>96.40</b>	<b>13.80</b>	<b>0.00</b>	<b>0.00</b>	<b>375.70</b>		<b>\$225,366.00</b>	<b>375.70</b>	<b>225,366.00</b>

**NON-ATTORNEYS**

Daniel Howick (PL)											4.30				4.30	\$200	\$860.00	4.30	\$860.00
Nadia Belkin (PL)	0.20														0.20	\$175	\$35.00	0.20	\$35.00
Marie Schenk (PL)								0.70			0.30				1.00	\$175	\$175.00	1.00	\$175.00
<b>SUB-TOTAL</b>	<b>0.20</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.70</b>	<b>0.00</b>	<b>0.00</b>	<b>4.60</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>5.50</b>		<b>\$1,070.00</b>	<b>5.50</b>	<b>\$1,070.00</b>
<b>GRAND TOTAL:</b>	<b>9.20</b>	<b>6.60</b>	<b>16.50</b>	<b>24.50</b>	<b>1.90</b>	<b>0.50</b>	<b>152.00</b>	<b>34.00</b>	<b>21.20</b>	<b>0.00</b>	<b>101.00</b>	<b>13.80</b>	<b>0.00</b>	<b>0.00</b>	<b>381.20</b>	<b>\$0.00</b>	<b>\$226,436.00</b>	<b>381.20</b>	<b>\$226,436.00</b>

# **EXHIBIT C**

**EXHIBIT C**

In re Lithium Ion Batteries Antitrust Litigation

CUNEO GILBERT &amp; LADUCA, LLP

<b>ATTORNEYS</b>	<b>DATE RANGE</b>	<b>HOURLY RATE</b>
Jonathan Cuneo	October 2015	\$895
	September 2013	\$850
	June 2013	\$800
Pamela Gilbert	June 1,2013	\$575
Joel Davidow	March 2014	\$895
	January 2014	\$825
	November 2013	\$800
	September 2013	\$775
	June 2013	\$750
Matthew Miller	July 2015	\$775
	January 2014	\$750
	September 2013	\$700
Sandra Cuneo	January 2014	\$725
	September 2013	\$675
	June 2013	\$625
Daniel Cohen	November 2013	\$695
	June 2013	\$650
William Anderson	September 2015	\$650
	January 2014	\$575
	November 2013	\$550
	June 2013	\$500
Katherine Van Dyck	September 2015	\$650
	November 2013	\$550
	June 2013	\$525
Jennifer Kelly	September 2015	\$575
	July 2015	\$500
	January 2014	\$475
	June 2013	\$450

Evelyn Li	March 2016	\$550
	July 2015	\$500
	March 2014	\$425
	June 2013	\$325
Julie Sorenson	September 2015	\$500
	July 2015	\$375
	August 2014	\$350
<b><u>NON-ATTORNEYS</u></b>		
	<b><u>DATE RANGE</u></b>	<b><u>HOURLY RATE</u></b>
Daniel Howick	June 1, 2013 – February 28, 2017	\$200
Nadia Belkin	June 1, 2013 – February 28, 2017	\$175
Marie Schenk	June 1, 2013 – February 28, 2017	\$175

# **EXHIBIT D**

**(REDACTED)**

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
6/5/2013	11	Daniel Howick	Worked with Katie to prepare cover sheet, summons, etc.	2.00
6/14/2013	11	Katie Van Dyck	Update calendar with new deadlines	0.30
6/17/2013	11	Sandra Cuneo	Telcons JWC (3x), S. Williams, CPM, re: Le CA plaintiff update	0.20
6/17/2013	11	Daniel Howick	Emailed SameDay and Katie regarding affidavits of service, etc.	1.50
6/17/2013	8	Katie Van Dyck	Review returned summonses to ensure compliance with service deadlines (3.0); correspond with clerk's office to correct address on docket (0.5)	3.50
6/20/2013	11	Daniel Howick	Follow up with SameDay regarding affidavits	0.80
6/24/2013	8	Katie Van Dyck	Review scheduling order and order regarding code of conduct	0.20
6/27/2013	8	Katie Van Dyck	Review order granting Berman motion to seal (0.1); prepare correspondence to litigation team regarding same (0.2)	0.30
6/28/2013	11	Sandra Cuneo	Emails & telcon to/from J Verducci re CGL lead plaintiffs; email CGL attys re same; emails JWC, S Williams re reasons for confidentiality agreement; email [REDACTED] re same	1.00
6/28/2013	8	Katie Van Dyck	Review correspondence from J. Verducci and S. Williams regarding draft consolidated complaint	0.20
6/29/2013	11	Joel Davidow	e-mails re: P.O.	0.50
6/29/2013	8	Katie Van Dyck	Review protective order; prepare correspondence to M. Bryant regarding same	0.50
6/30/2013	8	Katie Van Dyck	[REDACTED]	0.30
7/1/2013	8	Katie Van Dyck	[REDACTED]; correspond with J. Verducci regarding draft consolidated complaint (0.1); discuss strategy with litigation team (0.1); review draft complaint (1.2)	1.50
7/1/2013	11	Jonathan Cuneo	Emails and telcons with [REDACTED] and Katie Van Dyke	1.00
7/1/2013	11	Sandra Cuneo	Follow-up with CGL attorneys re named plaintiff acknowledgements (also on 6/30) (0.3); emails JWC, J. Verducci re named plaintiffs acknowledgements (0.2)	0.50
7/2/2013	8	Daniel Cohen	Review complaint and emails to [REDACTED]	1.50
7/2/2013	11	Joel Davidow	E-mails re: [REDACTED]; review of complaint	1.50
7/2/2013	8	Katie Van Dyck	Correspond with M. Bryant regarding draft complaint (0.2); correspond with J. Verducci regarding all firm clients' approval of consolidated complaint (0.3)	0.50
7/3/2013	8	Daniel Cohen	Review complaint and follow up with [REDACTED]	1.00
7/8/2013	8	Katie Van Dyck	Review day's filings	0.20
7/10/2013	11	Jonathan Cuneo	Meeting with MI client [REDACTED]	1.50
7/10/2013	8	Katie Van Dyck	Review order granting application for appointment to plaintiffs' steering committee; correspond with J. Cuneo regarding same	0.30

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
7/11/2013	11	Daniel Cohen	Conference with [REDACTED] client, review complaint and update	1.50
7/26/2013	8	Katie Van Dyck	Prepare correspondence to [REDACTED] regarding unsealing of consolidated complaint	0.20
7/29/2013	11	Katie Van Dyck	Correspond with M. Bryant regarding implications of lawsuit on mortgage application; review Sanyo information	0.30
8/19/2013	1	Matthew E. Miller	Legal research re discoverability of plaintiff's finances (2.0); exchanged emails w/JD, DB, JWC (2.0); Discussed defs' discovery issues w/JD (2.0)	6.00
9/5/2013	8	Katie Van Dyck	Update calendar with motion to dismiss briefing schedule	0.20
9/16/2013	8	Joel Davidow	Respond to Defendant's MTD	1.00
9/16/2013	8	Katie Van Dyck	Retrieve motions to dismiss filed by Defendants	0.30
1/21/2014	11	Katie Van Dyck	Correspond with S. Cuneo and J. Cuneo regarding upcoming status conference	0.30
1/27/2014	8	Joel Davidow	Review of MTD outline	1.00
2/12/2014	11	Katie Van Dyck	Review correspondence from lead counsel regarding 7 project (0.1); discuss same with J. Cuneo (0.1)	0.20
2/13/2014	11	Katie Van Dyck	Correspond with J. Cuneo regarding 7 project	0.30
2/14/2014	11	Jonathan Cuneo	Return from Detroit .	1.80
2/16/2014	8	Sandra Cuneo	Check CGL N. D. Cal complaints re MA Gen Law 93A claims at request of Lieff Cabraser (.4); respond to email query from LC re same (.4)	0.80
2/26/2014	8	Sandra Cuneo	Review protective order & sign & return acknowledgement; review indirect purchaser consolidated amended complaint; order re motions to dismiss; issue outline	2.50
2/27/2014	11	Evelyn Li	discussion & emails with Sandra re possible doc review project next month	0.30
3/4/2014	7	Sandra Cuneo	Review dox in SWC folder Sanyo 00011 (4.3); telcon R Spiegel re same (0.2)	4.50
3/6/2014	7	Sandra Cuneo	Review dox in SWC Sanyo folder 00011 (2.0); telcon R Spiegel for clarification of coding issues (0.2); recode 27 already-coded dox (1.8)	4.00
3/7/2014	11	Katie Van Dyck	Review stipulation dismissing Florida claims (0.3); prepare correspondence to D. Cohen and J. Cuneo regarding dismissal of Florida claims (0.2)	0.50
3/7/2014	7	Sandra Cuneo	Review dox in SWC Sanyo Folder 00011	4.00
3/8/2014	7	Sandra Cuneo	Review dox in SWC Sanyo Folder 00011	0.50
3/10/2014	7	Sandra Cuneo	Review & code SWC folder Sanyo 00011	0.50
3/11/2014	7	Sandra Cuneo	Review & code SWC Sanyo dox, Folder 00011 (4.7); email Lieff firm for summary of missed call yesterday (0.3)	5.00
3/12/2014	7	Sandra Cuneo	Review & code SWC Sanyo dox, Folder 00011	3.70
3/13/2014	7	Sandra Cuneo	Review & code SWC Sanyo dox, Folder 00011 (0.7); problems with Catalyst speed (0.3); begin review of Toshiba America folder 004 (0.7)	1.70
3/14/2014	7	Sandra Cuneo	Review & code SWC Toshiba America Folder 004 dox	1.30

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
3/18/2014	7	Sandra Cuneo	10,00 Review & code dox in Toshiba American folder 004; emails Lief & Berman re possibly interesting dox.	4.80
3/19/2014	7	Sandra Cuneo	Review & code dox in Toshiba America Folders 004, 005	4.00
3/20/2014	7	Sandra Cuneo	Review & code Toshiba America Folder 005	3.00
4/4/2014	8	Marie Schenk	final draft of Flannery notice of appearance (0.2); final draft of Sandra Cuneo withdrawal of appearance (0.2); draft of Danny Cohen notice of appearance(0.3)	0.70
5/2/2014	11	Jennifer Kelly	Communications with J Davidow regarding memorandum about joint and several liability in a conspiracy.	0.30
5/2/2014	8	Katie Van Dyck	Review correspondence from lead counsel regarding MTD opposition drafting assignment	0.10
5/2/2014	8	Joel Davidow	Review LGCAL MTD	1.00
5/3/2014	8	Joel Davidow	revisions to 12(b)(6) MTD	1.00
5/5/2014	11	Jennifer Kelly	Draft, review and revise memorandum regarding conspirator liability.	2.70
5/6/2014	8	Joel Davidow	review LG Cal MTD	2.50
5/6/2014	1	Matthew E. Miller	TC w/JD re litigation strategy (0.2); legal research re liability for acts of co-conspirator that precede joining conspiracy (0.2), emailed to JD, KVD (0.1)	0.50
5/6/2014	11	Jennifer Kelly	Draft, review and revise memorandum regarding conspirator liability.	2.50
5/7/2014	8	Jennifer Kelly	Communications with J Davidow regarding research for reply to LG CChem America, Inc. motion to dismiss (0.7). Legal research regarding discovery standards before class period and LGCAI background (0.7). Research regarding permissible discovery (0.6). Research regarding business activities of LGCAI and draft paragraph regarding same (0.5).	2.50
5/7/2014	8	Joel Davidow	Replies to LG MTD	2.50
5/8/2014	11	Jennifer Kelly	Communications regarding research ██████████	0.30
5/9/2014	11	Jennifer Kelly	Research and writing regarding ██████████ in the 9th Circuit. Pull cases and summarize.	0.20
5/12/2014	11	Jennifer Kelly	Research and writing regarding ██████████ in the 9th Circuit (0.75). Review pulled cases and summarize same (0.75)	1.50
5/12/2014	8	Katie Van Dyck	Begin preparing draft opposition to LGCAI motion to dismiss at request of lead counsel (1.2); correspond with co-counsel regarding same (0.1)	1.30
5/12/2014	8	Joel Davidow	reply to LGA MTD	3.00
5/13/2014	11	Jennifer Kelly	Research and writing regarding ██████████ in the 9th Circuit (1.4). Review pulled cases and summarize same (1.4)	2.80

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
5/13/2014	8	Katie Van Dyck	Conduct research and continue preparing draft opposition to LGCAI motion to dismiss	4.70
5/14/2014	11	Jonathan Cuneo	Review KVD draft	2.00
5/14/2014	8	Katie Van Dyck	Research and continue revising LGCAI opposition	3.80
5/23/2014	11	Katie Van Dyck	Correspond with lead counsel regarding 7	0.20
6/4/2014	11	Jonathan Cuneo	Travel to Michigan to meet with [REDACTED]	3.00
6/4/2014	8	Daniel Cohen	Review complaint and research coding protocol	2.50
6/9/2014	7	Daniel Cohen	Research for 7 from Sanyo English Folder. Custodian Takanan Mastsumoto	3.00
6/12/2014	7	Daniel Cohen	7 from Sanyo English Folder. Custodian Takanan Mastsumoto	3.00
7/1/2014	11	Daniel Cohen	Start review set up browser and conference call	5.00
7/2/2014	7	Daniel Cohen	7 from Stack.	4.00
7/3/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	2.00
7/7/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	4.50
7/8/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	4.00
7/9/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	3.00
7/10/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	4.00
7/11/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	3.00
7/12/2014	11	Jonathan Cuneo	Travel to and meet with SWC	1.00
7/15/2014	7	Daniel Cohen	7 Custodian Takanan Mastsumoto	4.00
7/16/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.00
7/17/2014	7	Daniel Cohen	Document from Sanyo English Folder Custodian Ali Pourfalh	4.00
7/18/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	2.00
7/21/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	5.00
7/22/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	6.00
7/23/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	3.00
7/24/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.00
7/25/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	5.00
7/28/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.50
7/29/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	3.50
7/30/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.50
7/31/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.50
8/1/2014	7	Daniel Cohen	Train Julie and 7 from Sanyo English Folder Custodian Ali Pourfalh	3.50
8/14/2014	7	Julie Sorenson	Catalyst training/phone conference/etc. Bates: ACBC006167	5.00
8/15/2014	7	Julie Sorenson	7 Bates #: SEL-DOJE-000008163 - SEL-DOJE-000008259	3.30
8/18/2014	7	Julie Sorenson	7 Bates #:SEL-DOJE-000008418 - SEL-DOJE-000009890	7.00
8/19/2014	7	Julie Sorenson	7 Bates #: SEL-DOJE-000009892 - SEL-DOJE-000010773	7.00

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
8/20/2014	7	Julie Sorenson	7 Bates #: SEL-DOJE-000010746 - SEL-DOJE-000011404	4.00
8/28/2014	7	Julie Sorenson	7 : SEL-DOJE-000011387 - SEL-DOJE-000011475	0.70
9/17/2014	11	Katie Van Dyck	[REDACTED]	0.30
10/1/2014	11	Katie Van Dyck	Correspond with J. Cuneo regarding client questionnaire	0.30
10/2/2014	11	Katie Van Dyck	Coordinate completion of client questionnaires (0.2); prepare correspondence to client and litigation team regarding same (0.2)	0.40
10/2/2014	11	Joel Davidow	Discovery letter to [REDACTED]	1.00
10/3/2014	11	Katie Van Dyck	Review and revise client questionnaire (0.6); correspond with client regarding same (0.2)	0.80
10/6/2014	11	Katie Van Dyck	Revise M. Bryan client questionnaire (0.3); correspond with client regarding questionnaire (0.2)	0.50
10/6/2014	11	Katie Van Dyck	Correspond with J. Cuneo, D. Cohen, and J. Davidow regarding [REDACTED]	0.20
10/6/2014	11	Daniel Cohen	Review case conference [REDACTED]	3.00
10/8/2014	11	Katie Van Dyck	Correspond with D. Cohen regarding McGuinness declaration	0.20
10/8/2014	11	Daniel Cohen	Review cases and development and conference with [REDACTED] on update and status	2.00
10/9/2014	11	Katie Van Dyck	Correspond with D. Cohen and lead counsel regarding [REDACTED]	0.30
10/9/2014	8	Daniel Cohen	Follow with our [REDACTED] amended complaint and review pleadings.	1.50
10/10/2014	11	Daniel Cohen	Conference with our [REDACTED] and research amended complaint	1.00
10/10/2014	11	Katie Van Dyck	Correspond with lead counsel regarding [REDACTED] declaration	0.20
10/13/2014	11	Daniel Cohen	Conference with [REDACTED] on case and updates	1.50
11/20/2014	11	Daniel Cohen	[REDACTED] research.	1.00
3/9/2015	11	Daniel Cohen	[REDACTED]	1.00
4/24/2015	11	Joel Davidow	[REDACTED]	0.50
4/24/2015	6	Jennifer Kelly	Review communications regarding beginning plaintiffs discovery.	0.20
4/24/2015	11	Daniel Cohen	Follow up with [REDACTED] on upcoming ROG testimony	1.50
4/26/2015	6	Jennifer Kelly	Review communications regarding beginning plaintiffs discovery.	0.30
4/26/2015	8	Katie Van Dyck	Correspond with V. Romanenko regarding clients' interrogatory responses	0.30
4/27/2015	11	Joel Davidow	calls [REDACTED] and D. Lambrinos	0.50
4/27/2015	11	Jonathan Cuneo	prepare for and attend interview with [REDACTED]	2.00
4/27/2015	6	Katie Van Dyck	Correspond with D. Lambrinos and [REDACTED] regarding discovery responses	0.20
4/28/2015	11	Daniel Cohen	Conference call with [REDACTED] concerning ROG responses with California	2.50
4/29/2015	11	Daniel Cohen	Follow up with [REDACTED] on ROG responses	1.50

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
4/30/2015	11	Daniel Cohen	Last follow up concerning responses and go over receipts	1.50
5/4/2015	6	Katie Van Dyck	Teleconference with D. Lambrinos and [REDACTED] regarding discovery responses	0.50
5/8/2015	11	Daniel Cohen	Review [REDACTED] final ROG responses and send on	1.50
5/11/2015	6	Katie Van Dyck	Prepare correspondence to [REDACTED] regarding draft interrogatory responses	0.30
5/19/2015	6	Katie Van Dyck	Review [REDACTED] revisions to interrogatory responses (0.3); correspond with D. Lambrinos regarding same (0.2)	0.50
6/18/2015	11	Jonathan Cuneo	e-mails and telcons re: 7 (.5); telcon with Lieff Cabraser (.5)	1.00
9/15/2015	11	Joel Davidow	review of Kiwak deposition ruling	0.50
9/22/2015	11	Jonathan Cuneo	emails with CPM and Sklaver re McGranahan. T with [REDACTED]	1.50
9/25/2015	11	Joel Davidow	e-mails re: changed name for [REDACTED]	1.00
9/28/2015	6	Katie Van Dyck	Teleconference with [REDACTED] regarding discovery responses	0.50
9/29/2015	6	Katie Van Dyck	Prepare [REDACTED] discovery responses (0.40); correspond with client and D. Lambrinos regarding [REDACTED] discovery responses (0.10)	0.50
9/30/2015	11	Marie Schenk	sending retainer agreement for signature on behalf of [REDACTED] instead of [REDACTED]	0.30
9/30/2015	11	Joel Davidow	new retention of [REDACTED] assoc.	1.00
11/4/2015	11	Jonathan Cuneo	telcons and e-mails re: deposition of [REDACTED]	1.00
11/11/2015	6	Jonathan Cuneo	Travel to and from Detroit (6). Prepare for [REDACTED] deposition (3). Follow up calls and emails re document production (3)	12.00
11/12/2015	11	Jonathan Cuneo	telcons and e-mails with co-counsel and [REDACTED] re: deposition	2.00
11/20/2015	11	William Anderson	Review correspondence (2). Prepare and send correspondence (.3). Draft and revise discovery response. (.5)	1.00
11/20/2015	11	Jonathan Cuneo	telcons with William Anderson re: supplemental response interrogatories	1.00
12/1/2015	11	Jonathan Cuneo	review filings from [REDACTED] declaration; telcon with [REDACTED]	1.00
12/2/2015	11	Jonathan Cuneo	e-mails and correspondence with [REDACTED]	0.50
12/15/2015	8	Joel Davidow	draft [REDACTED], dismissal issues	1.00
12/24/2015	8	Joel Davidow	review of pleadings re: [REDACTED]	0.50
1/15/2016	6	Katie Van Dyck	Correspond with [REDACTED] and M. Caylao regarding verification for second set of interrogatories	0.50
1/21/2016	5	Daniel Cohen	Conference with California and [REDACTED] concerning upcoming deposition and [REDACTED] declaration	1.50
1/27/2016	5	Daniel Cohen	Conference with [REDACTED] and California on upcoming depositions	1.50

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
1/29/2016	5	Daniel Cohen	Follow up with [REDACTED] and [REDACTED] concerning upcoming depositions.	0.50
2/1/2016	5	Joel Davidow	analyzing [REDACTED] Assoc. deposition transcript	1.50
2/3/2016	5	Daniel Cohen	Conference with [REDACTED] and [REDACTED] concerning upcoming depositions.	1.00
2/5/2016	5	Joel Davidow	emails re: [REDACTED] depo	2.00
2/6/2016	5	Joel Davidow	emails re: [REDACTED] depositions	1.50
2/7/2016	5	Joel Davidow	Prep for [REDACTED] deposition	1.00
2/8/2016	6	Katie Van Dyck	Correspond with lead counsel and [REDACTED] regarding protective order and outstanding discovery	0.20
2/9/2016	8	Katie Van Dyck	Provide lead counsel with protective order declaration executed by [REDACTED]	0.30
2/12/2016	5	Daniel Cohen	Follow up with [REDACTED] and [REDACTED] concerning upcoming depositions and review verifications	1.00
2/22/2016	5	Daniel Cohen	calls with [REDACTED] and [REDACTED] for upcoming prep for depositions review discovery responses.	1.50
2/23/2016	5	Daniel Cohen	Participate on phone prepping [REDACTED] for his deposition and review materials beforehand.	4.00
2/29/2016	6	Katie Van Dyck	[REDACTED]	0.20
2/29/2016	6	Katie Van Dyck	[REDACTED]	0.30
3/6/2016	11	Jonathan Cuneo	[REDACTED]	0.50
3/7/2016	8	Jonathan Cuneo	review [REDACTED] transcript	3.00
3/7/2016	5	Daniel Cohen	Review [REDACTED] deposition and conference call with Pat.	1.50
3/9/2016	8	Jonathan Cuneo	Review [REDACTED] testimony (1.5); [REDACTED] (1.5)	3.00
3/10/2016	6	Katie Van Dyck	Prepare correspondence to client [REDACTED] requesting verification of responses to requests for production	0.20
3/10/2016	5	Joel Davidow	Prep for [REDACTED]	1.00
3/11/2016	6	Daniel Cohen	follow up with [REDACTED] on discovery issues and affidavit conference call with Attorneys in California	1.50
3/11/2016	6	Katie Van Dyck	Correspond with lead counsel and client [REDACTED] regarding verifications for discovery responses	0.30
3/12/2016	5	Joel Davidow	Prep for [REDACTED] dep	2.00
3/13/2016	5	Joel Davidow	Prep for [REDACTED] deposition on scheduling	1.50
3/14/2016	6	Katie Van Dyck	Correspond with lead counsel regarding verifications for [REDACTED] discovery responses	0.20
3/14/2016	6	Katie Van Dyck	Teleconference with [REDACTED] regarding verifications and responses to requests for production	0.50
3/14/2016	11	Daniel Cohen	talk with [REDACTED] on Verification review and send to California.	1.00
3/14/2016	11	Joel Davidow	meeting w/Plaintiff (.5); meeting w/co-counsel (.5)	1.00
3/14/2016	1	Nadia N. Belkin	Searching for [REDACTED] for Joel	0.20
3/14/2016	5	Jennifer Kelly	Call with J Davidow regarding preparing witness [REDACTED] for his deposition and send docs regarding same.	0.10

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
3/15/2016	11	Jonathan Cuneo	prepare for and meet with [REDACTED]	2.00
3/17/2016	6	Katie Van Dyck	Correspond with lead counsel and client [REDACTED] regarding scheduling of meeting to prepare for deposition	0.50
3/18/2016	11	Daniel Cohen	Various calls concerning new discovery requests for computers.	1.50
3/18/2016	11	Jonathan Cuneo	review memo (.2); telcons with Katie and Danny (.3); telcons with Demeritus (.3); emails with Demeritus (.2)	1.00
3/19/2016	6	Katie Van Dyck	Teleconference with J. Cuneo and D. Cohen regarding request to remotely search Plaintiffs' computers	0.30
3/20/2016	8	Jonathan Cuneo	prepare responses with respect to computer search demand from Cotchett office	1.00
3/21/2016	1	Katie Van Dyck	Teleconference with [REDACTED] regarding proposed remote computer search	0.50
3/21/2016	1	Katie Van Dyck	Correspond with lead counsel regarding proposed remote computer search	0.30
3/21/2016	6	Katie Van Dyck	Correspond with lead counsel and plaintiff [REDACTED] regarding scheduling of deposition preparation session	0.20
3/21/2016	5	Daniel Cohen	Follow up with [REDACTED], review deposition and conference with Jon C.	1.50
3/21/2016	11	Jonathan Cuneo	prepare for and attend conference call with Steve Williams and Emeritus (5); multiple calls with [REDACTED] (5); telcons with Katie (5); response to Cotchett demand for computer search of clients (5).	2.00
3/21/2016	11	Pamela Gilbert	Meet with Jon Cuneo to discuss privacy issues	0.50
3/22/2016	11	Daniel Cohen	various conference calls concerning discovery issues and call with [REDACTED] and research.	2.00
3/22/2016	1	Katie Van Dyck	Teleconference with lead counsel, J. Cuneo, and D. Cohen regarding proposed remote computer search	0.50
3/23/2016	1	Katie Van Dyck	Teleconference with client regarding proposed computer search	0.50
3/24/2016	1	Katie Van Dyck	Correspond with [REDACTED] regarding scheduling of computer search with vendor	0.20
4/4/2016	11	Daniel Cohen	Conference with [REDACTED] and gather material for computer search on Tuesday.	1.00
4/4/2016	1	Katie Van Dyck	Correspond with D. Lambrinos, [REDACTED] and D. Cohen regarding computer search	0.50
4/5/2016	11	Daniel Cohen	Stay on conference call while expert goes over our clients computer remotely.	5.00
4/6/2016	11	Daniel Cohen	Follow up with [REDACTED] material, conference call with California and prepare for call tomorrow	2.00
4/7/2016	11	Daniel Cohen	Conference call and computer check for [REDACTED]	4.00
4/8/2016	6	Daniel Cohen	follow up with discovery issues from [REDACTED]	2.00
4/8/2016	6	Katie Van Dyck	Correspond with [REDACTED] regarding computer search and latest discovery responses	0.30

Lithium Ion Batteries Time Detail  
Cuneo Gilbert LaDuca,LLPEXHIBIT D

Date	Task Code	Timekeeper	Description	Time
4/12/2016	5	Katie Van Dyck	Correspond with lead counsel regarding scheduling of deposition preparation session with [REDACTED]	0.30
4/12/2016	6	Katie Van Dyck	Correspond with [REDACTED] regarding scheduling of deposition preparation session	0.20
4/14/2016	5	Katie Van Dyck	Assist in preparing [REDACTED] for upcoming deposition	1.00
4/19/2016	6	Katie Van Dyck	Correspond with lead counsel regarding [REDACTED] interrogatory response and verification	0.20
4/20/2016	5	Katie Van Dyck	Correspond with lead counsel regarding outcome of [REDACTED] deposition	0.30
4/26/2016	5	Katie Van Dyck	[REDACTED]	0.20
7/1/2016	11	Daniel Cohen	Follow up with [REDACTED] concerning discovery issues and review receipts	1.50
7/5/2016	11	Daniel Cohen	follow up with client and conference with lead attorneys	1.50
7/19/2016	6	Daniel Cohen	follow up with discovery issues from [REDACTED]	1.00
11/18/2016	8	Daniel Cohen	[REDACTED]	1.00
11/21/2016	12	Daniel Cohen	[REDACTED]	2.00
11/22/2016	12	Daniel Cohen	[REDACTED]	1.00
11/28/2016	12	Katie Van Dyck	[REDACTED]	0.30
11/28/2016	12	Katie Van Dyck	[REDACTED]	0.20
11/28/2016	12	Jonathan Cuneo	[REDACTED]	0.30
11/28/2016	12	Daniel Cohen	[REDACTED]	2.00
11/29/2016	12	Daniel Cohen	[REDACTED]	1.00
11/30/2016	12	Jonathan Cuneo	[REDACTED]	0.20
12/16/2016	12	Daniel Cohen	[REDACTED]	2.00
12/20/2016	12	Katie Van Dyck	[REDACTED]	0.30
12/20/2016	12	Daniel Cohen	[REDACTED]	2.00
1/4/2017	12	Katie Van Dyck	[REDACTED]	0.20
1/4/2017	12	Daniel Cohen	[REDACTED]	2.00
1/5/2017	8	Daniel Cohen	Call with [REDACTED] review pleadings and call with LA	2.00
1/6/2017	12	Katie Van Dyck	Correspond with lead counsel and [REDACTED] regarding NEC settlement	0.30
			TOTAL	381.20

# EXHIBIT E

**EXHIBIT E**

In re Lithium Ion Batteries Antitrust Litigation  
**Cuneo Gilbert & LaDuca, LLP**  
 Reported Expenses Incurred on Behalf of IPPs

**EXPENSE REPORT**

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Attorney Service	
Litigation Assessment	\$50,000.00
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	\$48.82
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	\$168.20
Messenger/Delivery	
Photocopies – In House (capped at \$0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	\$60.03
Travel	\$2,032.28
Miscellaneous - Pacer	\$82.70
<b>TOTAL:</b>	\$52,392.03