

EXHIBIT 15

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**
21

**DECLARATION OF JOHN G. EMERSON
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS'
FEES AND REIMBURSEMENT OF
EXPENSES ON BEHALF OF EMERSON
SCOTT, LLP**

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28 **DECLARATION OF JOHN G. EMERSON IN SUPPORT OF IPSS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF
OF EMERSON SCOTT, LLP; No. 13-md-02420-YGR (DMR)**

1 I, John G. Emerson, declare:

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

7 2. My firm has served as counsel to Plaintiff Robert S. Harmon / A-1 Computers and
8 as counsel for IPPs throughout the course of this litigation. The background and experience of
9 Emerson Scott, LLP and its attorneys are summarized in the curriculum vitae attached hereto as
10 **Exhibit A**.

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

15 4. During the pendency of the litigation, Emerson Scott, LLP performed the following
16 work: at the direction of Lead Counsel on behalf of the Arkansas Plaintiff, Bob Harmon and his
17 business A-1 Computers, we prepared A-1 Computers and Bob Harmon’s claims. This work
18 involved meetings with the plaintiff A-1 Computers/Bob Harmon on numerous occasions,
19 preparation of client questionnaires, preparation of discovery responses including interrogatories
20 and production responses, document preservation matters, identifying and determining what
21 batteries purchased were pertinent to plaintiff’s claims, preparation of plaintiff declarations and
22 verifications, worked with our Arizona client Thomas Tuohy concerning his batteries and claims,
23 and coordinated with numerous lawyers including lawyers and paralegals in Lead Counsel’s
24 offices concerning all of the above.

25 5. Attached hereto as **Exhibit B** is a billing summary of Emerson Scott, LLP’s total
26 hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017.
27 Counsel for Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment

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DECLARATION OF JOHN G. EMERSON IN SUPPORT OF IPSS’ MOTION FOR AN
AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF
OF EMERSON SCOTT, LLP; No. 13-md-02420-YGR (DMR)

1 of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent
2 by Emerson Scott, LLP during this period of time was 74.70, with a corresponding lodestar based
3 on current rates of \$53,523.00. The lodestar amount reflected in Exhibit B is for work assigned by
4 Lead Counsel, and was performed by professional staff at my law firm. This summary was
5 prepared from contemporaneous, daily time records regularly prepared and maintained by
6 Emerson Scott, LLP.

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

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

12 8. Emerson Scott, LLP expended a total of \$0 in unreimbursed costs and expenses in
13 connection with the prosecution of this case and is not seeking any reimbursement of costs and
14 expenses.

15 9. I have reviewed the time and expenses reported by Emerson Scott, LLP in this case
16 which are included in this declaration, and I affirm that they are true and accurate.

17
18 I declare under penalty of perjury under the laws of the United States that the foregoing is
19 true and correct.

20 Executed on 24th day of May, 2017 at Little Rock, Arkansas.

21
22 */s/ John G. Emerson*

23 _____
24 John G. Emerson
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EXHIBIT A

Emerson Scott, LLP

Attorneys at Law

Little Rock

Houston

Class Action Litigation
Antitrust Litigation
Securities Litigation
ERISA Litigation
Consumer Litigation
Trials and Appeals
Personal Injury and Wrongful Death
Criminal Defense
Martindale-Hubble AV Rated

Our Firm

Emerson Scott, LLP (“ES”) has a national class action legal practice with offices in Houston, Texas, and Little Rock, Arkansas.

The Firm and its team of experienced attorneys and paralegals, handles complex commercial litigation with a concentration on cases that involve violations of federal antitrust statutes, violations of federal and state consumer protection laws, securities laws, and violations of the Employee Retirement Income Security Act of 1974 (“ERISA”). ES has prosecuted numerous antitrust class action cases, consumer class action cases, securities fraud, and shareholder derivative cases representing consumers, damaged companies, and investors around the country and abroad. ES and its predecessor firms have been active in many class action and individual cases of note. In the class action litigation area, ES and its predecessor firm have represented plaintiffs in well over 100 class action or other complex litigation cases.

In antitrust, ES is currently a member of the Plaintiffs’ Counsel Steering Committee in the *Aluminum Warehousing Antitrust Litigation* representing first level purchasers in this Multi-District Litigation (“MDL”), 13 MDL 2481 (KBF), which was pending in the Southern District of New York and is currently on appeal in the U.S. Court of Appeals for the 2nd Circuit. ES has represented plaintiffs in the *Compact Disc Antitrust Litigation* filed against the music industry in

the United States, and plaintiffs in the *High Pressure Laminates Antitrust Litigation* in the direct purchaser case. ES has been or is currently involved in the following antitrust cases: *Lithium Ion Batteries Antitrust Litigation*, *CRT (Cathode Ray Tube) Antitrust Litigation*, *Flash Memory Antitrust Litigation*, *GPU (Graphics Processing Units) Antitrust Litigation*, *Ocean Shipping Antitrust Litigation*, *TFT-LCD (Flat Panel) Antitrust Litigation*, *Trans-Pacific Airline Surcharge Litigation*, *Domestic Airlines Antitrust*, *Liquid Aluminum Sulfate Antitrust Litigation*, and *Bridgestone Anti-Vibration Rubber Parts Antitrust Litigation*, among other cases.

In privacy and data breach, ES is actively involved prosecuting cases for aggrieved consumers in the following pending MDL cases: *In re: Anthem Healthcare Data Breach Litigation*, MDL No. 2617 (N.D. Cal.); *In re: Premera Healthcare Data Breach Litigation*, (D. OR.) MDL No. 2633; *In re: Medical Informatics Engineering Data Breach Litigation*, MDL No. 2667 (N.D. Ind.); *In re: Office of Personnel Management Data Breach Litigation* (D.D.C.) MDL No. 2664; *In re: Experian Data Breach Litigation* (C.D.CA.) MDL No. 2676 in which nearly half of the named plaintiffs in the consolidated amended complaint are clients of ES, and *In re: Vizio, Inc., Consumer Privacy Litigation* (C.D.CA.). ES is also actively involved in prosecuting two data breach cases in Arizona, *In re: Banner Health Data Breach Litigation* and *In re: Valley Anesthesiology Data Breach Litigation*.

In other consumer protection cases, ES currently represents numerous corn farmers in the United States in consolidated actions in the MDL *In re: Syngenta AG MIR162 Corn Litigation* (MDL 2591) pending before Judge John W. Lungstrum in the District of Kansas. In September, 2016, this case was certified as a national class and eight states had classes certified including the state of Arkansas where ES represents the designated Arkansas bellwether trial plaintiff and many other Arkansas corn farmers. John Emerson of Emerson Scott was a leader in the MDL baby bottle action captioned *In Re: Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation* in the United States District Court for the Western District of Missouri. John Emerson of Emerson Scott was Co-Lead Counsel in the *Webb et al. v. Carters Inc. et al.* class action litigation in the United States District Court for the Central District of California concerning Carter's line of tag-less baby clothing; in the *Montanez et al. v. Gerber Childrenswear, Inc., et al.* class action litigation in the United States District Court for the Central District of California concerning Gerber's line of tag-less baby clothing.

ES's predecessor firm served as Co-Lead Counsel in several MDL cases involving product liability and consumer protection issues. In 2004, Emerson Scott's predecessor firm was appointed by the Honorable Stephen P. Friot as Plaintiffs' Co-Lead Counsel in *In re: Farmers Insurance Co., Inc. FCRA Litigation*, which was settled in the Western District of Oklahoma. This case was litigated on behalf of a certified class of Farmer's current and past customers who were charged

more than the lowest premium for insurance based upon information in a consumer report, and received certain “adverse action” notices that willfully failed to conform to the Fair Credit Reporting Act. The case resolved in late 2011 and provided class members with about \$100 million in cash and other relief. ES’s predecessor firm represented numerous long-grain rice farmers in Arkansas and other states, in the MDL action *In re: Genetically Modified Rice Litigation* (the “*Rice MDL Action*”). The *Rice MDL Action* sought damages for long-grain rice producers in Arkansas, Missouri, Mississippi, Louisiana, and Texas for defendants’ contamination of the United States’ rice supply with genetically modified rice as revealed by Bayer and the USDA in August 2006. This MDL action was settled for over \$750 million in cash relief for American rice farmers. ES’s predecessor served as Co-Lead Plaintiffs’ Counsel in an MDL case transferred to the Honorable Richard D. Bennett of the District of Maryland captioned *In Re: Tyson Foods, Inc. Chicken Raised Without Antibiotics Consumer Litigation*. The case involved false advertising claims associated with the sale of Tyson Foods’ chicken as being raised without antibiotics, when in fact the chicken was raised with antibiotics. The action was settled for \$5 million in cash and other relief for class members who purchased the chicken products at issue.

The Firm has been active in prosecuting cases seeking to improve corporate governance in public companies through its involvement in shareholder derivative litigation. Most notably, John Emerson, served as Co-Lead Counsel in cases resulting in significant and far-reaching corporate governance and compliance improvements within companies such as AOL/Time Warner, Computer Associates, Nicor, Cryolife, Inc., and Crompton (Chemtura). The Firm has also represented shareholders in claims involving corporate buyouts and other change-of-control transactions.

Finally, John Emerson of ES served on the *Enron ERISA Litigation* Plaintiffs’ Counsel Steering Committee. This case settled in the United States District Court, Southern District of Texas, Houston Division in 2005.

Our Attorneys

John G. Emerson

Partner



Mr. Emerson is a founding partner of ES. He was born in Little Rock, Arkansas, and was raised there and in Houston, Texas. He is a member of the state bars of Texas, Washington and Arkansas. Mr. Emerson obtained his Bachelor of Arts from the University of Texas at Austin and then earned his Juris Doctorate from South Texas College of Law Houston. Mr. Emerson has been rated “AV Preeminent” for the last 18 years by Martindale-Hubbell. This is the highest possible peer review rating in legal ability and ethical standards. Mr. Emerson was honored by being named one of the Top 100 Trial Lawyers in America by the National Trial Lawyers in 2013 -2016.

In his antitrust practice, Mr. Emerson is currently a member of the Plaintiffs’ Counsel Steering Committee in the *Aluminum Warehousing Antitrust Litigation* representing first level purchasers in this MDL, 13 MDL2481 (KBF), which was pending in the Southern District of New York and is currently on appeal in the U.S. Court of Appeals for the 2nd Circuit. Mr. Emerson has represented plaintiffs in the *Compact Disc Antitrust Litigation* filed against the music industry in the United States, and plaintiffs in the *High Pressure Laminates Antitrust Litigation* in the direct purchaser case. Notably, Mr. Emerson also has been or is currently involved in the following antitrust cases: *Lithium Ion Batteries Antitrust Litigation*, *CRT (Cathode Ray Tube) Antitrust Litigation*, *Flash Memory Antitrust Litigation*, *GPU (Graphics Processing Units) Antitrust Litigation*, *Ocean Shipping Antitrust Litigation*, *TFT-LCD (Flat Panel) Antitrust Litigation*, *Trans-Pacific Airline Surcharge Litigation*, *Domestic Airlines Antitrust Litigation*, *Liquid Aluminum Sulfate Antitrust Litigation*, and the *Bridgestone Anti-Vibration Rubber Parts Antitrust Litigation* case, among others.

In his privacy and data breach practice, Mr. Emerson is actively involved prosecuting cases for aggrieved consumers in the following pending MDL cases: *In re: Anthem Healthcare Data Breach Litigation*, MDL No. 2617 (N.D. Cal.); *In re: Premera Healthcare Data Breach Litigation*, (D. OR.) MDL No. 2633; *In re: Medical Informatics Engineering Data Breach Litigation*, MDL No. 2667 (N.D. Ind.); *In re: Office of Personnel Management Data Breach Litigation* (D.D.C.) MDL No. 2664; *In re: Experian Data Breach Litigation* (C.D.CA.) MDL No.

2676, and *In re: Vizio, Inc., Consumer Privacy Litigation* (C.D.CA.). He is also actively involved in prosecuting two Arizona data breach cases, *In re: Banner Health Data Breach Litigation* and *In re: Valley Anesthesiology Data Breach Litigation*.

In his consumer class action practice, Mr. Emerson represents numerous corn farmers in the United States in consolidated actions in the MDL *In re: Syngenta AG MIR162 Corn Litigation* (MDL 2591) pending before Judge John W. Lungstrum in the District of Kansas. On September 11, 2016 the Court denied defendant's motion to dismiss in major part. On September, 26, 2016 this case was certified as a national class and eight states had classes certified including the state of Arkansas where Mr. Emerson represents the designated Arkansas bellwether trial plaintiff as well as many other Arkansas corn producers. This case is currently set for trial on June 5, 2017. Currently, he also is prosecuting cases involving food products allegedly contaminated with the synthetic chemical glyphosate such as a case against General Mills involving Nature Valley snack bars and a case against Sioux Honey Association Cooperative involving honey products. Finally, Mr. Emerson is currently representing policyholders in cases against Transamerica and Lincoln Life concerning increased cost of insurance rates and/or increased monthly deductions. Mr. Emerson served as Chairman of the Expert Witness Committee in the consolidated MDL action styled *In Re: Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation* filed in the United States District Court for the Western District of Missouri. Mr. Emerson represented one of the named lead plaintiffs in the *AOL Version 5.0 Software Litigation*. He was Co-Lead Counsel in an action filed against the Farmers Insurance Group of Companies involving alleged violations of the Fair Credit Reporting Act which resolved for plaintiffs. He was Co-Lead Counsel for a number of parents in the Gerber's baby clothing litigation and the Carter's baby clothing litigation. Both cases resolved for plaintiffs in 2013. Mr. Emerson was a consultant to Canadian plaintiffs' counsel in the Canadian *Medtronic Pacemaker Pacing Lead Product Liability Litigation* that was certified and settled in British Columbia as a Canadian national class action. He has been a consultant to Canadian counsel in the Canadian *Compact Disc Antitrust Litigation*, the Canadian *Publishers Clearing House Litigation*, and the Canadian *AOL 5.0 Software Litigation*.

In his retirement plan practice, Mr. Emerson was appointed to the Plaintiffs' Counsel Steering Committee by Judge Melinda Harmon, United States District Judge, Southern District of Texas – Houston Division, in the consolidated Enron ERISA Litigation, styled *Pamela M. Tittle v. Enron Corp., et al.*

In his corporate practice, Mr. Emerson has represented numerous stockholders in shareholder derivative lawsuits brought against corporate boards alleging breaches of fiduciary duties. These suits sought to impose corporate governance reforms aimed at protecting

shareholders and eliminating corporate waste and abuse. In the past, Mr. Emerson served as one of the lead counsel in the Computer Associates shareholder derivative action in the Federal District Court for the Eastern District of New York. This action was brought against the Computer Associates' board of directors and led to the resignation of the Company's CFO, the resignation of two other senior financial officers, and the adoption of certain corporate governance measures that Computer Associates has since represented as the "gold standard" of governance reform. Mr. Emerson was Co-Lead Counsel in the case styled *In Re: Nicor, Inc. Shareholder Derivative Litigation* in the Circuit Court of Cook County, Illinois County Department, Chancery Division. This action was brought against Nicor's board of directors and its settlement resulted in major corporate governance improvements at Nicor. Mr. Emerson was Co-Lead Counsel in the case styled *In Re: Cryolife Derivative Litigation* pending in the Superior Court of Fulton County, Georgia. The settlement of this action resulted in wide-sweeping corporate governance improvements at Cryolife. Mr. Emerson was also Co-Lead Counsel in the case styled *In re: AOL Time Warner Shareholder Derivative Litigation* which was settled in the Federal District Court for the Southern District of New York. This settlement resulted in wide ranging corporate governance and compliance changes and was recognized as a substantial factor in Time Warner's ability to obtain \$200 million from its Directors' and Officers' (D&O) insurance carriers. Mr. Emerson was Lead Counsel in the action styled *In re: Crompton* (now known as Chemtura) *Shareholder Derivative Litigation* which settled with Crompton's D & O carrier, AIG, at JAMS in New York and was thereafter approved by the Bankruptcy Court for the Southern District of New York. This settlement resulted in major corporate governance improvements.

Mr. Emerson was admitted to the Texas Bar in 1980. He is admitted to practice before the U.S. Supreme Court; U.S. Court of Appeals for the 2nd, 5th, and 8th Circuits; U.S. District Courts for the Northern, Southern, Eastern, and Western Districts of Texas; Eastern and Western Districts of Arkansas; Western District of Washington; District of Colorado; Eastern District of Michigan; and all Texas, Washington, and Arkansas state courts.

Mr. Emerson has extensive jury trial experience over the past 36 years. He is a member of the legal fraternity Delta Theta Phi. He is also a member of The National Trial Lawyers; American Association for Justice ("AAJ"); AAJ Class Action Litigation Group; Fellow of The Pound Civil Justice Institute; Texas Trial Lawyers Association; American Bar Association (Tort and Insurance Practice and Legal Economics Sections); State Bar of Texas (Grievance Committee 4-D, Houston, 1991-94); Membership Services Committee, 1991-92); Sustaining Life Fellow Texas Bar Foundation; Bar Association for the United States District Court for the Eastern District of Texas; Houston Bar Association; Fellow of the Houston Bar Foundation; Washington State Bar; King

County Bar Association; Arkansas Trial Lawyers Association; Pulaski County Bar Association; and the Arkansas Bar Association. Mr. Emerson was honored by the Governor of Arkansas when he was named an Arkansas Traveler, an Ambassador of Good Will on behalf of the people of the state of Arkansas to people everywhere.

Mr. Emerson is married with two children, two grandsons, and five rescued dachshunds. He enjoys the outdoors and has hunted and fished in the United States, Canada, Mexico, Honduras, Uruguay, Argentina, Botswana, and South Africa. He is a member of Ducks Unlimited and is a life member of Safari Club International.

Mr. Emerson's email address is jemerson@emersonfirm.com.

David G. Scott

Partner

Mr. Scott is a founding partner of Emerson Scott, LLP. He was born and raised in Warren, Arkansas. Mr. Scott received his Bachelor of Science degree in Business Administration, with a major in Finance, from the University of Arkansas at Fayetteville in 1982 and his Juris Doctorate from the William H. Bowen School of Law in Little Rock, Arkansas in 2006.

Mr. Scott received his Chartered Financial Analysts (CFA) designation from The Institute of Chartered Financial Analysts in 1993, charter number 18365. He was an institutional investments representative and manager prior to law school with Prudential-Bache Securities, Dean Witter Reynolds, Inc., and SouthWest Securities, Inc. While working in the field of institutional investments for eighteen years, Mr. Scott specialized in the areas of asset/liability management, portfolio immunization, and hedging in the financial futures markets and cash markets for large institutional clients such as banks, insurance companies, savings and loans, and mortgage bankers. He further specialized in the mortgage-backed securities and mortgage markets where he was involved in the development of the first collateralized mortgage obligation securities.

Mr. Scott has extensive experience in representation of clients in the personal injury, drug injury, medical malpractice, and complex litigation areas. Mr. Scott has worked and is working extensively in the MDL *In re: Syngenta AG MIR162 Corn Litigation* (MDL 2591) and the case, *In Re: Aluminum Warehousing Antitrust Litigation*, (13 MDL 2481 (KBF)). He is also deeply involved in the representation of class action plaintiffs in numerous consumer protection and antitrust cases, including *In re: Anthem Healthcare Data Breach Litigation*, MDL No. 2617 (N.D. Cal.); *In re: Premera Healthcare Data Breach Litigation*, (D. OR.) MDL No. 2633; *In re: Medical Informatics Engineering Data Breach Litigation*, MDL No. 2667 (N.D. Ind.); *In re: Office of Personnel Management Data Breach Litigation* (D.D.C.) MDL No. 2664; and *In re: Experian*

Data Breach Litigation (C.D. Cal.) MDL No. 2676 as well as two data breach cases in Arizona, *In re: Banner Health Data Breach Litigation* and *In re: Valley Anesthesiology Data Breach Litigation*.

Mr. Scott has extensive criminal law experience as he was previously a Special Prosecutor for the State of Arkansas and successfully prosecuted to conviction over 1000 felony cases.

Mr. Scott was tendered and qualified as expert witness in the area of financial analysis and testified as to his opinion in the embezzlement case, *State v. Jean Leek*, CR 2010-4307, in the Fourth Division of Pulaski County, Arkansas Circuit Court. The defendant was convicted.

Mr. Scott is a member of the Bar of the State of Arkansas and is admitted to practice in the United States District Courts for the Eastern and Western Districts of Arkansas. He is also a member of the American Association of Justice, the Arkansas Trial Lawyers Association, the Arkansas Bar Association, American Association for Justice (“AAJ”), and the AAJ Class Action Litigation Group.

Mr. Scott’s email address is dscott@emersonfirm.com

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT
 REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Firm Name: EMERSON SCOTT, LLP

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
EMERSON, JOHN (P)								0.70			57.00				57.70	\$795.00	\$45,871.50
POYNTER, SCOTT (P)								0.20			0.50				0.70	\$695.00	\$486.50
CROWDER, WILL (P)											10.10				10.10	\$550.00	\$5,555.00
JENNINGS, CHRIS (SRA)	0.50							1.20							1.70	\$550.00	\$935.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
SUB-TOTAL	0.50	0.00	0.00	0.00	0.00	0.00	0.00	2.10	0.00	0.00	67.60	0.00	0.00	0.00	70.20		\$52,848.00
NON-ATTORNEYS																	
AUTRY, TANYA (PL)								2.20			1.70				3.90	\$150.00	\$585.00
GASTINEAU, CHARLIE (PL)	0.60														0.60	\$150.00	\$90.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
SUB-TOTAL	0.60	0.00	0.00	0.00	0.00	0.00	0.00	2.20	0.00	0.00	1.70	0.00	0.00	0.00	4.50		\$675.00
GRAND TOTAL:	1.10	0.00	0.00	0.00	0.00	0.00	0.00	4.30	0.00	0.00	69.30	0.00	0.00	0.00	74.70		\$53,523.00

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

EMERSON SCOTT LLP

<u>ATTORNEYS</u>	<u>DATE RANGE</u>	<u>HOURLY RATE</u>
EMERSON, JOHN (P)	INCEPTION TO CLOSE	\$795.00
POYNTER, SCOTT (P)	INCEPTION TO CLOSE	\$695.00
CROWDER, WILL (P)	INCEPTION TO CLOSE	\$550.00
JENNINGS, CHRIS (SRA)	INCEPTION TO CLOSE	\$550.00
<u>NON-ATTORNEYS</u>	<u>DATE RANGE</u>	<u>HOURLY RATE</u>
AUTRY, TANYA (PL)	INCEPTION TO CLOSE	\$150.00
GASTINEAU, CHARLIE (PL)	INCEPTION TO CLOSE	\$150.00

EXHIBIT D

(REDACTED)

BATTERY ANTITRUST LITIGATION
REVISED/AMENDED TIME REPORTFor time due: - June 1, 2013 to February 28, 2017 **REVISED-AMENDED 2017.05.23-TA****BATTERY (A)**

EMERSON SCOTT, LLP, 1301 SCOTT STREET, LITTLE ROCK, AR 72202 PHONE (501) 907-2555

Last Name, First Name	Category	Date of Service	Detailed Description of Work performed	Billing Rate	Time	Fees Total
Emerson, John	11	6/20/2013	Read Noss email re [REDACTED]	\$795.00	0.10	\$79.50
Emerson, John	11	6/20/2013	Coordination with [REDACTED]	\$795.00	0.50	\$397.50
Emerson, John	11	6/20/2013	Coordinate with Scott Poynter regarding [REDACTED]	\$795.00	0.20	\$159.00
Emerson, John	11	6/28/2013	Read Noss email re clients and email Noss re same.	\$795.00	0.20	\$159.00
Emerson, John	11	6/28/2013	Email Will Crowder re [REDACTED]	\$795.00	0.10	\$79.50
Emerson, John	11	6/28/2013	Coordinate by email with Verducci re draft consolidated amended complaint;	\$795.00	0.50	\$397.50
Emerson, John	11	7/1/2013	Coordinate via email with Noss re [REDACTED]	\$795.00	0.20	\$159.00
Emerson, John	11	7/1/2013	Emails to and from Will Crowder regarding Noss.	\$795.00	0.20	\$159.00
Emerson, John	8	7/2/2013	Read Chris Jennings email re draft consolidated amended complaint.	\$795.00	0.20	\$159.00
Emerson, John	8	7/2/2013	Review and make suggested edits to the draft consolidated amended complaint.	\$795.00	0.50	\$397.50
Emerson, John	11	7/2/2013	Email Chris Jennings [REDACTED] to Walter Noss	\$795.00	0.10	\$79.50
Emerson, John	11	10/3/2014	Read Scott Poynter email with attached A-1 Computers (Robert Harmon) Document Preservation, and another questionnaire for A-1; review attached documents	\$795.00	1.20	\$954.00
Emerson, John	11	10/3/2014	Coordination with Scott Poynter and Lasha Garcia re [REDACTED]	\$795.00	0.80	\$636.00
Emerson, John	11	10/3/2014	Coordination with Moore re camera batteries. Have Moore take picture of bateries and email to me. Receive and review pictures and info off of the batteries and email to co-counsel.	\$795.00	1.00	\$795.00
Emerson, John	11	10/6/2014	Coordination with Lasha Garcia re receipt of [REDACTED] and [REDACTED] & related docs and additional client items to come to her. Email all [REDACTED] materials to Lasha Garcia at Cotchett's office	\$795.00	0.90	\$715.50
Emerson, John	11	10/6/2014	Read [REDACTED] email re 17 products with batteries; email [REDACTED] re same; read [REDACTED] email with attachments;	\$795.00	0.30	\$238.50
Emerson, John	11	10/6/2014	Review 12 attachments from [REDACTED] with attached doc preservation and client questionnaire material; Coordination with [REDACTED] re doc preservation & questionnaire material.	\$795.00	0.40	\$318.00
Emerson, John	11	10/6/2014	Coordinate with Lasha Garcia re Preservation Declarations for [REDACTED]	\$795.00	0.30	\$238.50
Emerson, John	11	10/6/2014	Coordinatin with client [REDACTED] re the signed Document Preservation Declaration.	\$795.00	0.30	\$238.50
		10/6/2014	Coordination with [REDACTED] re her preservation documents;	\$795.00	0.20	\$159.00
Emerson, John	11	10/6/2014	Receive and review signed preservation of documents letter from [REDACTED]	\$795.00	0.50	\$397.50
Emerson, John	11	10/6/2014	Forward to counsel the signed preservation of documents letter from [REDACTED]	\$795.00	0.10	\$79.50
Emerson, John	11	10/6/2014	Coordination with Lasha Garcia with information and photos of batteries from our [REDACTED]	\$795.00	0.40	\$318.00
Emerson, John	11	10/6/2014	Conference with Charlie Gastineau re client retainers. Receive and review client retainers and forward same to co-counsel.	\$795.00	0.10	\$79.50
Emerson, John	11	10/7/2014	Coordinate with Will Crowder re [REDACTED] documents.	\$795.00	0.40	\$318.00
Emerson, John	11	10/7/2014	Receive and review [REDACTED] evidence documents.	\$795.00	0.30	\$238.50

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Emerson, John	11	10/7/2014	Send A-1 evidence documents to Jennie Anderson & coordinate with Jennie Anderson re these documents.	\$795.00	0.10	\$79.50
Emerson, John	11	10/8/2014	Coordinate with Jennie Anderson email re [REDACTED]	\$795.00	0.20	\$159.00
Emerson, John	11	10/8/2014	Read 2nd Jennie Anderson email re making changes/revisions to [REDACTED] Declaration.	\$795.00	0.20	\$159.00
Emerson, John	11	10/8/2014	Read Will Crowder email re making changes to [REDACTED] Declaration.	\$795.00	0.10	\$79.50
Emerson, John	11	10/8/2014	Revise/edit [REDACTED] Declaration.	\$795.00	0.60	\$477.00
Emerson, John	11	10/8/2014	Read and reply to Jennie Anderson email re Products 2 and 3 etc.;	\$795.00	0.10	\$79.50
Emerson, John	11	10/8/2014	Coordinate with client [REDACTED] re faxing the docs; email Tom re same;	\$795.00	0.30	\$238.50
Emerson, John	11	10/8/2014	Email Lasha re problems with [REDACTED] docs and coordination with Lasha re [REDACTED] documents.	\$795.00	0.30	\$238.50
Emerson, John	11	10/8/2014	Read Tanya Autry email with [REDACTED] doc; review revised [REDACTED] docs.	\$795.00	0.40	\$318.00
Emerson, John	11	10/8/2014	Email Lasha Garcia at Joe Cotchett's office the signed [REDACTED]; read Lasha email re same.	\$795.00	0.20	\$159.00
Emerson, John	11	10/8/2014	Read Tanya Autry email regarding Revised [REDACTED] Declaration.	\$795.00	0.10	\$79.50
Emerson, John	11	10/8/2014	Receive and review [REDACTED] fax with revised declaration info docs; email [REDACTED] re same.	\$795.00	0.20	\$159.00
Emerson, John	11	10/8/2014	Revise [REDACTED] Declaration and email same to Lasha Garcia & Jeannie Anderson	\$795.00	0.60	\$477.00
Emerson, John	11	10/17/2014	Read Jennie Anderson email re our client [REDACTED] with redline edits and clean version; review same.	\$795.00	0.90	\$715.50
Emerson, John	11	10/17/2014	Read Will Crowder email to Jennie re draft letter; read Jennie email re same.	\$795.00	0.20	\$159.00
Emerson, John	11	10/17/2014	read Will Crowder email re pdf of letter re ESI and review letter.	\$795.00	0.20	\$159.00
Emerson, John	11	10/17/2014	read Shana Scarlett email re correction to letter and make corrections to letter.	\$795.00	0.30	\$238.50
Emerson, John	11	10/17/2014	read Will Crowder email with corrected letter.	\$795.00	0.10	\$79.50
Emerson, John	11	11/4/2014	Coordination with Lasha at Cotchett re Verizon receipts from [REDACTED]	\$795.00	0.30	\$238.50
Emerson, John	11	2/7/2015	Telephone message to Arizona client [REDACTED] again regarding Verification form to be completed.	\$795.00	0.10	\$79.50
Emerson, John	11	2/7/2015	Call [REDACTED] and leave another VM re his calling me and getting the Verification back to me.	\$795.00	0.10	\$79.50
Emerson, John	11	4/28/2015	Coordinate with Jenny Anderson, Demetrious Lambrinos, and Jaclyn Verducci re the Master Grid, Document Checklist, the link to the folders, and defendants RFP's and Rogs to [REDACTED]	\$795.00	1.00	\$795.00
Emerson, John	11	4/29/2015	2 telephone conferences with Jenny Andersen re [REDACTED] issues.	\$795.00	0.50	\$397.50
Emerson, John	11	4/29/2015	telephone conference with client [REDACTED] computers re issues.	\$795.00	0.30	\$238.50
Emerson, John	11	5/1/2015	Read Demetrius email re talking at 9 AM this morning.	\$795.00	0.10	\$79.50
Emerson, John	11	5/1/2015	t/message to Demetrius at 9 AM; email Demetrius that I called, no answer.	\$795.00	0.10	\$79.50
Emerson, John	11	5/1/2015	t/conf with Demetrius re client discovery issues.	\$795.00	0.50	\$397.50
Emerson, John	11	5/1/2015	Email Jennie Anderson re my dealing directly with Demetrius; read Anderson email re same.	\$795.00	0.20	\$159.00
Emerson, John	11	5/1/2015	Review in-house file materials for answering Interrogs and RFP.	\$795.00	0.70	\$556.50
Emerson, John	11	5/1/2015	Read & reply to Demetrius email re defendants at issue.	\$795.00	0.10	\$79.50
Emerson, John	11	5/1/2015	read Demetrius email re corporate document checklist.	\$795.00	0.10	\$79.50
Emerson, John	11	5/1/2015	Coordinate with Demetrius Lambrinos, Michael Caylao, Jenny Anderson, and [REDACTED] re information (Rog Responses and Document Checklist) needed from Arkansas client [REDACTED] and [REDACTED] Computers.	\$795.00	0.50	\$397.50
Emerson, John	11	5/1/2015	coordinate with Tanya Autry re the photographs of [REDACTED] batteries and receipts.	\$795.00	0.20	\$159.00
Emerson, John	11	5/1/2015	Further coordination with Demetrius re physical possession of the batteries.	\$795.00	0.30	\$238.50

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Emerson, John		5/1/2015	Further coordination with Jenny Anderson re incorporating Harmon and A-1 information into the template for the Interrogatories and for the template for the RFP's.	\$795.00	0.40	\$318.00
Emerson, John	11	5/1/2015	Receive and review the photographs of Mr. Harmon's batteries and receipts.	\$795.00	0.20	\$159.00
Emerson, John	11	5/2/2015	Send Arkansas client Bob Harmon the interrogatories and request for production of documents with instructions. Tel conf with Bob Harmon re questions re roggs and Monday's deadline for same.	\$795.00	0.50	\$397.50
Emerson, John	11	5/2/2015	Send message to Jenny Anderson and Demetrius regarding the Monday deadline and read message from Jenny re same.	\$795.00	0.10	\$79.50
Emerson, John	11	5/3/2015	Coordinate with Demetrius via email re conference call tomorrow morning.	\$795.00	0.20	\$159.00
Emerson, John	11	5/4/2015	Send message to Michael Caylao re docs regarding AZ client Thomas Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/4/2015	Coordinate with Jenny Anderson with docs, 1st interrogatories, 1st request for production, document checklist, and master grid;	\$795.00	0.30	\$238.50
Emerson, John	11	5/4/2015	Coordinate with Arkansas client Bob Harmon regarding purchases from 2010 and 2011 from Samsung, LG, Panasonic, Sanyo, Sony, NEC, NEC Tokin, Hitachi, Toshiba, or Maxell;	\$795.00	0.40	\$318.00
Emerson, John	11	5/4/2015	review client questionnaire for Oregon client Lissy Moore;	\$795.00	0.10	\$79.50
Emerson, John	11	5/4/2015	Coordination with T Autry re client questionnaire for Oregon client Lissy Moore	\$795.00	0.20	\$159.00
Emerson, John	11	5/4/2015	Coordinate with Lissy Moore re her Samsung phone;	\$795.00	0.30	\$238.50
Emerson, John	11	5/4/2015	Coordination with Demetrius Lambrinos re Lissy Moore issues;	\$795.00	0.20	\$159.00
Emerson, John	11	5/4/2015	Coordination with Demetrius with Moore's client questionnaire (that was previously sent to Lasha);	\$795.00	0.30	\$238.50
Emerson, John	11	5/4/2015	Coordination with Jenny Anderson re my working directly with Demetrius on my clients issues;	\$795.00	0.40	\$318.00
Emerson, John	11	5/4/2015	send message to T Autry re other cases where A-1 or Bob Harmon has been a client and class representative;	\$795.00	0.20	\$159.00
Emerson, John	11	5/4/2015	Read email from T Autry with list of cases where Bob Harmon has been a client.	\$795.00	0.10	\$79.50
Emerson, John	11	5/5/2015	Conference with Scott Poynter re my meeting with client Harmon today re discovery matters;	\$795.00	0.30	\$238.50
Emerson, John	11	5/5/2015	read email from client Alice Moore in Oregon re her battery purchase; email Alice re holding on to her items;	\$795.00	0.10	\$79.50
Emerson, John	11	5/5/2015	Conference with Will Crowder re my meeting with Bob Harmon at A-1 re discovery; drive to North Little Rock, Arkansas and meet with client, Bob Harmon of A-1 Computers re discovery.	\$795.00	1.50	\$1,192.50
Emerson, John	11	5/5/2015	Read message from T Autry re the docs for my review re Harmon's prior work as a class rep in other cases; review those docs;	\$795.00	0.30	\$238.50
Emerson, John	11	5/5/2015	read message from Harmon re his two Toshiba batteries;	\$795.00	0.10	\$79.50
Emerson, John	11	5/5/2015	read message Demetrius Lambrinos re the Oregon client Alice Moore;	\$795.00	0.10	\$79.50
Emerson, John	11	5/5/2015	read Demetrius message re other qualifying purchases by Harmon;	\$795.00	0.10	\$79.50
Emerson, John	11	5/5/2015	read message from Demetrius regarding my Arizona client Thomas Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/5/2015	reply to email message from Demetrius regarding my Arizona client Thomas Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/6/2015	Send message to Demetrius Lambrinos regarding Oregon client Alice Moore, complaint, client questionnaire, my contact with Arizona client, Mr. Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/6/2015	send message to client Bob Harmon regarding my driving over to his store to pick up the Toshiba batteries in question;	\$795.00	0.10	\$79.50
Emerson, John	11	5/6/2015	send message to Demetrius regarding these two Toshiba batteries;	\$795.00	0.10	\$79.50
Emerson, John	11	5/6/2015	read message from Michael Caylao with various documents on AZ client Mr. Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/6/2015	compare Tuohy docs with what we have here;	\$795.00	0.20	\$159.00

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Emerson, John	11	5/6/2015	Telephone conf with Bob about him having his batteries ready for pick-up and my driving over to see him and pick up batteries.	\$795.00	0.10	\$79.50
Emerson, John	11	5/6/2015	Meet Bob at his new office; pick up batteries, discuss batteries with Bob, and drive back to Little Rock office.	\$795.00	1.40	\$1,113.00
Emerson, John	11	5/6/2015	send message to Michael Caylao re my getting the Tuohy data filled in for him; read message from Demetrius Lambrinos re Oregon issues;	\$795.00	0.20	\$159.00
Emerson, John	3	5/7/2015	Review client file material for discovery responses.	\$795.00	0.50	\$397.50
Emerson, John	11	5/7/2015	Email Demetrius re A-1 information in email format rather than spreadsheet format.	\$795.00	0.10	\$79.50
Emerson, John	11	5/7/2015	Email client Tuohy re discovery response issues	\$795.00	0.10	\$79.50
Emerson, John	11	5/7/2015	Read Demetrius email re the A-1 info that I sent to him.	\$795.00	0.10	\$79.50
Emerson, John	11	5/7/2015	Email Demetrius re client Tuohy information	\$795.00	0.10	\$79.50
Emerson, John	11	5/7/2015	Read Demetrius email re Touhy	\$795.00	0.10	\$79.50
Emerson, John	11	5/7/2015	Read another Demetrius email re Tuohy info	\$795.00	0.10	\$79.50
Emerson, John	11	5/7/2015	Multiple conferences with Bob Harmon at A-1 discovery issues.	\$795.00	1.90	\$1,510.50
Emerson, John	11	5/8/2015	Coordinate with Arizona client Tom Tuohy regarding the information on his Blackberry Curve and Toshiba laptop.	\$795.00	0.20	\$159.00
Emerson, John	11	5/8/2015	Coordinate with Tom Tuohy re class period issues and other products.	\$795.00	0.20	\$159.00
Emerson, John	11	5/8/2015	Coordinate with Demetrius Lambrinos and Michael Caylao re Tuohy's Blackberry and Toshiba laptop.	\$795.00	0.40	\$318.00
Emerson, John	11	5/8/2015	Conference with Demetrius Lambrinos re the replacement batteries that Harmon purchased for A-1.	\$795.00	0.30	\$238.50
Emerson, John	11	5/8/2015	Edit the Interrogatory Response for A-1, dates of purchase, resale issues, verification and send to co-counsel.	\$795.00	1.10	\$874.50
Emerson, John	11	5/9/2015	Read Demetrius Lambrinos message with updated Verification form for Tuohy and issues re the Blackberry battery;	\$795.00	0.20	\$159.00
Emerson, John	11	5/9/2016	Read another message from Demetrius with finalized version if Interrogatory Responses for Tom Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/9/2016	Review finalized version of Interrogatory Responses for Tom Tuohy that were emailed to me from Demetrius.	\$795.00	0.60	\$477.00
Emerson, John	11	5/11/2015	Telephone conf with client Bob Harmon at A-1 Computers re the eReader device and other batteries, Interog Verification, etc.;	\$795.00	0.20	\$159.00
Emerson, John	11	5/11/2015	email Demetrius re eReader device and resale issues.	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	read Demetrius email re eReader device and resale issue re other batteries.	\$795.00	0.20	\$159.00
Emerson, John	11	5/11/2015	telephone conf with Demetrius Lambrinos re eReader device and resale issue re other batteries.	\$795.00	0.40	\$318.00
Emerson, John	11	5/11/2015	read Lambrinos email with finalized Rogs for A-1.	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	Meet with client Bob Harmon at his offices and go over all of these issues with his devices and batteries; drive back to Little Rock office from Mr. Harmon's office.	\$795.00	1.50	\$1,192.50
Emerson, John	11	5/11/2015	2nd t/conf with Demetrius Lambrinos re Harmon and A-1 issues;	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	t/message to client Thomas Tuohy re his batteries;	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	Coordinate with client Tuohy re his Interog Verification;	\$795.00	0.30	\$238.50
Emerson, John	11	5/11/2015	email Demetrius and Caylao re Tuohy matter; read Demetrius email confirming;	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	read Demetrius email re Stip to drop A-1 and substituting Bob;	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	Read Demetrius email re Rog responses.	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2015	Analyze Rog responses.	\$795.00	0.30	\$238.50
Emerson, John	11	5/11/2015	Read Tuohy email re shipping his Blackberry to me.	\$795.00	0.10	\$79.50

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Emerson, John	11	5/11/2015	read Demetrius email re Verification; email Verification again; read another Demetrius email saying nothing attached;	\$795.00	0.10	\$79.50
Emerson, John	11	5/12/2015	Receive Blackberry from client Tuohy;	\$795.00	0.10	\$79.50
Emerson, John	11	5/12/2015	photograph, write down info, and prepare chain of custody form re same.	\$795.00	0.30	\$238.50
Emerson, John	11	5/12/2015	Coordination with T Autry re Tuohy Verification.	\$795.00	0.20	\$159.00
Emerson, John	11	5/12/2015	Coordinate with Demetrius and Caylao re the Verification from Tuohy;	\$795.00	0.30	\$238.50
Emerson, John	11	5/13/2015	Draft letter to Demetrius Lambrinos re the Blackberry that I received from client Thomas Tuohy;	\$795.00	0.30	\$238.50
Emerson, John	11	5/13/2015	t/conf with client Bob Harmon re picking up the 2nd Literati eReader; text message to Harmon re same;	\$795.00	0.20	\$159.00
Emerson, John	11	5/14/2015	Meet with Bob Harmon at his office and pick up the 2nd Literati eReader device; return to my office.	\$795.00	1.50	\$1,192.50
Emerson, John	11	5/14/2015	prepare letter to Demetrius and Michael Caylao transmitting the two Literati eReader devices and charger to them;	\$795.00	0.20	\$159.00
Emerson, John	11	5/29/2015	Coordinate with Tom Tuohy re his expense in sending us his BB device and safekeeping of the device.	\$795.00	0.10	\$79.50
Emerson, John	11	5/29/2015	Coordinate with Charlie Gastineau re reimbursement to Tom Tuohy for expenses sending us his Blackberry device.	\$795.00	0.10	\$79.50
Emerson, John	11	9/15/2015	t/conf with Demetrius Lambrinos re Toshiba MSJ issues and my calling the AZ client Tom Tuohy re Toshiba emails, etc.;	\$795.00	0.70	\$556.50
Emerson, John	11	9/15/2015	Telephone conference with AZ client Tom Tuohy about his email system, etc.;	\$795.00	0.30	\$238.50
Emerson, John	11	9/15/2015	email to Mr. Tuohy re the his email system	\$795.00	0.10	\$79.50
Emerson, John	11	9/15/2015	2nd t/conf with Demetrius re A-1 Computer and Robert Harmon issues;	\$795.00	0.30	\$238.50
Emerson, John	11	9/15/2015	t/message from Tom Tuohy re these matters;	\$795.00	0.10	\$79.50
Emerson, John	11	9/15/2015	t/conf with Tom Tuohy re Toshiba issues;	\$795.00	0.30	\$238.50
Emerson, John	11	9/15/2015	email Demetrius Lambrinos re Tom's answers and two more questions re Toshiba;	\$795.00	0.10	\$79.50
Emerson, John	11	9/15/2015	t/message to Tom Tuohy re two additional questions re Toshiba;	\$795.00	0.10	\$79.50
Emerson, John	11	9/17/2015	Telephone conf and meeting with client Bob Harmon re meeting at his office to discuss questions from Demetrius Lambrinos, the document preservation doc, substituting him in for his business A-1 Computers, new client agreement, and client questionnaire.	\$795.00	1.50	\$1,192.50
Emerson, John	11	9/17/2015	Email Demetrius re my meeting today with client Bob Harmon;	\$795.00	0.10	\$79.50
Emerson, John	11	9/17/2015	Email scanned Harmon docs to Demetrius Lambrinos;	\$795.00	0.10	\$79.50
Emerson, John	11	9/17/2015	Update client questionnaire for Harmon;	\$795.00	0.30	\$238.50
Emerson, John	11	9/17/2015	email Demetrius the Client Questionnaire from Harmon	\$795.00	0.10	\$79.50
Emerson, John	11	9/22/2015	Coordinate with Demetrius Lambrinos re the document preservation declaration for Mr. Harmon's signature and getting the declaration squared away	\$795.00	0.30	\$238.50
Emerson, John	11	9/23/2015	Coordinate with Tanya Autry re her message to Demetrius, Michael Caylao, and David Scott re the Declaration on document preservation signed by Mr. Harmon;	\$795.00	0.20	\$159.00
Emerson, John	11	9/29/2015	Read message from Demetrius Lambrinos re a Cerification for A-1 for Interrogatory Responses.	\$795.00	0.10	\$79.50
Emerson, John	11	9/29/2015	Coordinate with Robert Harmon at A-1 re Certification.	\$795.00	0.10	\$79.50
Emerson, John	11	12/10/2015	Coordinate with Kathryn Hoek at Susman re depositions of IPP's, Hunt, Johns, Knowles, Sellers, and Van Patten.	\$795.00	0.30	\$238.50
Emerson, John	11	12/14/2015	Coordinate with Hoek, Lambrinos, and Sklaver re my clients, Tuohy and Harmon and Ken Mann message re Mr. Hunt in Phoenix;	\$795.00	0.20	\$159.00

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Emerson, John	11	12/22/2015	Coordinate with Kathryn Hoek at Susman, Demetrius Lambrinos at Cotchett, and Steve Sklaver at Susman re client matters related to Harmon and Tuohy and the qualifying purchases.	\$795.00	0.50	\$397.50
Emerson, John	11	12/23/2016	telephone message from Jeaneth Decena at Hagens Berman regarding Robert Harmon-AR Rep questions;	\$795.00	0.10	\$79.50
Emerson, John	11	12/23/2015	Review Harmon Client Questionnaire for discussion with Jeaneth;	\$795.00	0.50	\$397.50
Emerson, John	11	12/23/2015	Send Questionnaire from Sept 2015 to Jeaneth; t/conf with Jeaneth and go over Client Questionnaire;	\$795.00	0.40	\$318.00
Emerson, John	11	1/7/2016	Coordinate with Michael Caylao at Cotchett Pitre regarding the Verification form for Mr. Tuohy;	\$795.00	0.20	\$159.00
Emerson, John	11	1/8/2016	Read message from Michael Caylao about the Tuohy Verification;	\$795.00	0.10	\$79.50
Emerson, John	11	1/8/2016	send message to Arizona client Tom Tuohy regarding Supplementary Objections and Responses to 2nd Interrogatories and Verification;	\$795.00	0.20	\$159.00
Emerson, John	11	1/8/2016	send message to Michael Caylao re the Verification;	\$795.00	0.10	\$79.50
Emerson, John	11	2/2/2016	Coordination with Arizona client Tom Tuohy again regarding Supplementary Objections and Responses to 2nd Interrogatories and Verification;	\$795.00	0.30	\$238.50
Emerson, John	11	2/2/2016	review evidence storage and locate two additional batteries for Arkansas client Bob Harmon, one Dell and one unknown Chinese;	\$795.00	0.30	\$238.50
Emerson, John	11	2/2/2016	Coordinate with Harmon re two additional batteries	\$795.00	0.20	\$159.00
Emerson, John	11	2/2/2016	Photograph and email photo of the client's laptop Chinese battery; photograph and email photo of the client's Dell laptop battery made in Korea;	\$795.00	0.50	\$397.50
Emerson, John	11	2/3/2016	Telephone conference with Arizona client Thomas Tuohy regarding his Verification	\$795.00	0.30	\$238.50
Emerson, John	11	2/3/2016	Coordinate with client Harmon re other batteries in our evidence storage room	\$795.00	0.30	\$238.50
Emerson, John	11	2/8/2016	Coordination with AZ client Thomas Tuohy re letter he received from Shana Scarlett and the issue of his Verification form;	\$795.00	0.30	\$238.50
Emerson, John	11	2/8/2016	Email to Tom forwarding message from Michael Caylao re the Verification form;	\$795.00	0.10	\$79.50
Emerson, John	11	2/15/2016	Read message from Demetrius Lambrinos re a good time for Krysta to call re Mr. Tuohy and send message to Demetrius and Krysta Kauble Pachman re a call tomorrow re Mr. Tuohy	\$795.00	0.20	\$159.00
Emerson, John	11	2/15/2016	send message to Demetrius and Caylao with signed verification from Tuohy	\$795.00	0.10	\$79.50
Emerson, John	11	2/15/2016	read message from Demetrius re Tuohy verification	\$795.00	0.10	\$79.50
Emerson, John	11	3/11/2016	Read message from Krysta Kauble Pachman at Susman Godfrey re the hearing with the magistrate judge and verification issues	\$795.00	0.10	\$79.50
Emerson, John	11	3/11/2016	Receive and review documents including First Amended Responses to Defendants First Set of Interrogatories; First Amended Responses to Toshiba's First Set of Requests for Production, Defendants Verification, and Toshiba Verification.	\$795.00	0.40	\$318.00
Emerson, John	11	3/12/2016	Coordination with AZ plaintiff Thomas Tuohy re the hearing with the magistrate judge and verification issues and sending him the documents sent to us from Krysta	\$795.00	0.40	\$318.00
Emerson, John	11	3/12/2016	Coordinate with AR plaintiff Bob Harmon re the hearing with the magistrate judge and verification issues and sending him the documents sent to us from Krysta	\$795.00	0.30	\$238.50
Emerson, John	11	3/12/2016	send message to Krysta Kauble Pachman re my sending the documents to my clients;	\$795.00	0.10	\$79.50
Emerson, John	11	3/12/2016	Coordination with Demetrius Lambrinos message re reviewing the responses with the clients before they sign verifications	\$795.00	0.20	\$159.00
Emerson, John	11	3/14/2016	Coordination with Demetrius Lambrinos re reviewing the discovery with the clients before they sign the verifications.	\$795.00	0.30	\$238.50
Emerson, John	11	3/16/2016	Read message from AR client Bob Harmon re his Verifications; review his verifications;	\$795.00	0.20	\$159.00

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Emerson, John	11	3/16/2016	Coordinate with Tanya Autry regarding edits to Harmon verifications.	\$795.00	0.10	\$79.50
Emerson, John	11	3/17/2016	Send message to Demetrius Lambrinos, Krysta Kauble Pachman, and David Scott re Verifications to discovery	\$795.00	0.10	\$79.50
Emerson, John	11	3/17/2016	Coordinate with AZ plaintiff Thomas Tuohy re the responses and review of his two Verifications, one to defendants and the other to Toshiba.	\$795.00	0.30	\$238.50
Emerson, John	11	3/17/2016	Send Tuohy Verifications to Demetrius Lambrinos, Krysta Kauble Pachman, and David Scott	\$795.00	0.10	\$79.50
Emerson, John	11	3/17/2016	confer with Bob Harmon re his Verifications	\$795.00	0.20	\$159.00
Emerson, John	11	3/17/2016	Send Bob Harmon's Verifications to Demetrius and Krysta.	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2016	Coordinate with Demetrius Lambrinos message re update Verification form issues;	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2016	Coordination with Demetrius Lambrinos and Michael Caylao re A-1 resale of batteries issues.	\$795.00	0.40	\$318.00
Emerson, John	11	5/11/2016	Drive to Bob Harmon's offices to coordinate with him regarding batteries and get him to sign verification.	\$795.00	1.40	\$1,113.00
Emerson, John	11	5/11/2016	send Tom Tuohy in AZ a message with the Tuohy Responses to Interrogatories and re what Demetrius and Michael Caylao said about the Toshiba;	\$795.00	0.10	\$79.50
Emerson, John	11	5/11/2016	Coordinate with Demetrius re my conversation with Thomas Tuohy by phone, his verification, and his answers to interrogatories;	\$795.00	0.30	\$238.50
EMERSON JOHN			TOTAL		57.70	\$45,871.50
Poynter, Scott	11	10/7/2014	Coordinate with J Emerson and W Crowder re client information and forms.	\$695.00	0.20	\$139.00
Poynter, Scott	8	10/17/2014	Work on responding to ESI request on behalf of client, Robert Harmon for A-1 Computers.	\$695.00	0.20	\$139.00
Poynter, Scott	11	4/28/2015	Coordination with Jennie Anderson re discovery from A-1 computers.	\$695.00	0.30	\$208.50
POYNTER, SCOTT			TOTAL		0.70	\$486.50
Crowder, William	11	6/28/2013	Telephone conference and emails with client Lissy Moore re Oregon cases and damages.	\$550.00	0.50	\$275.00
Crowder, William	11	6/28/2013	Coordination with J Emerson and Minnesota client re his client damages and case.	\$550.00	0.10	\$55.00
Crowder, William	11	7/1/2013	Coordinate with J Emerson re Noss email re other plaintiffs.	\$550.00	0.10	\$55.00
Crowder, William	11	7/1/2013	Coordinate with co-counsel re Oregon client damages.	\$550.00	0.20	\$110.00
Crowder, William	11	7/2/2013	Receive and review retainer agreement from Oregon client and email to J Emerson.	\$550.00	0.10	\$55.00
Crowder, William	11	7/2/2013	Coordination with J Emerson and C Jennings re the draft consolidated, amended complaint and sending the information on our Oregon Client to Walter Noss.	\$550.00	0.30	\$165.00
Crowder, William	11	7/2/2013	Email Oregon client info to Walter Noss.	\$550.00	0.10	\$55.00
Crowder, William	11	10/3/2014	Communicate with Mr. Harmon re meeting to go over the preservation declaration and questionnaire. Discussed what we would need from him for same and verbally reviewed the questionnaire so he could note what we would need for him to collect for our files.	\$550.00	1.00	\$550.00
Crowder, William	11	10/3/2014	Coordinate with John Emerson and Scott Poynter regarding Mr. Harmon.	\$550.00	0.30	\$165.00
Crowder, William	11	10/5/2014	Meet with Mr. Harmon at A-1 Computer Offices to go over case status, review files, and questionnaire and preservation .	\$550.00	2.30	\$1,265.00
Crowder, William	11	10/7/2014	Catalogue Client Materials.	\$550.00	0.40	\$220.00
Crowder, William	11	10/7/2014	Complete Questionnaire and Forms with Mr. Harmon and Email same to John Emerson & Scott Poynter.	\$550.00	0.60	\$330.00
Crowder, William	11	10/7/2014	Coordinate with John Emerson re Harmon documents and evidence	\$550.00	0.10	\$55.00
Crowder, William	11	10/7/2014	Prepare to final and send A-1 documents to Jennie Anderson.	\$550.00	0.20	\$110.00
Crowder, William	11	10/8/2014	Coordinate with John Emerson re client Harmon and A-1 docs;	\$550.00	0.10	\$55.00
Crowder, William	11	10/8/2014	Emails to Jennie Anderson re edits Harmon's Declaration.	\$550.00	0.20	\$110.00
Crowder, William	11	10/8/2014	Revise/Edit Declaration as to my coordination with Jennie Anderson.	\$550.00	0.80	\$440.00

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Crowder, William	11	10/8/2014	Coordinate with John Emerson re Tuohy Declaration.	\$550.00	0.10	\$55.00
Crowder, William	11	10/17/2014	Communicate with Ms. Anderson and Mr. Harmon re ESI letter and strategy re same.	\$550.00	0.30	\$165.00
Crowder, William	11	10/17/2014	Draft ESI letter.	\$550.00	0.90	\$495.00
Crowder, William	11	10/17/2014	Conference with John Emerson regarding ESI Letter.	\$550.00	0.10	\$55.00
Crowder, William	11	10/17/2014	Work with Jennie Anderson re our client A-1 Computers; read email from Jennie Anderson re same	\$550.00	0.50	\$275.00
Crowder, William	11	10/17/2014	Draft letter to Bob Harmon regarding Amended Complaint edits	\$550.00	0.20	\$110.00
Crowder, William	11	10/17/2014	Review next draft letter from Jennie with redline edits and clean version.	\$550.00	0.30	\$165.00
Crowder, William	11	12/5/2014	Communicate with Mr. Harmon and Ms. Jennie Anderson regarding corporate title of Mr. Harmon.	\$550.00	0.30	\$165.00
Crowder, William			TOTAL		10.10	\$5,555.00
Jennings, Chris	1	6/20/2013	Coordinate with J Emerson and Lead Counsel re Tuohy client questionnaire.	\$550.00	0.20	\$110.00
Jennings, Chris	8	7/2/2013	Coordinate with W Crowder and J Emerson re status of client review and signatures needed in re protective order. Coordinate with J Emerson and W Crowder re Oregon client, draft consolidated complaint, and email Oregon client retainer agreement to Walter Noss.	\$550.00	1.20	\$660.00
Jennings, Chris	1	10/6/2014	Coordinate with John Emerson regarding Tom Tuohy & Lissy Moore Retainer Agreements. Email same to John emerson.	\$550.00	0.30	\$165.00
Jennings, Chris			TOTAL		1.70	\$935.00
Gastineau, Charlie	1	10/9/2014	Conference with J. Emerson re status of Robert Harmon, Lissy Moore, and Tom Tuohy signed agreements, W-9 forms, completed client information sheets, and signed Declarations forms and organization of files.	\$150.00	0.20	\$30.00
Gastineau, Charlie	1	10/9/2014	Review Harmon, Moore, and Tuohy client information sheets.	\$150.00	0.20	\$30.00
Gastineau, Charlie	1	10/9/2014	Email Harmon, Moore, and Tuohy documents ot J. Emerson.	\$150.00	0.10	\$15.00
Gastineau, Charlie	1	10/9/2014	Coordinate with Tanya Autry regarding Tuohy documents and her conference with J. Emerson re same.	\$150.00	0.10	\$15.00
Gastineau, Charlie			TOTAL		0.60	\$90.00
Autry, Tanya	8	1/3/2014	Draft, prepare to final and file Motion to Withdraw Chris Jennings as Counsel of Record.	\$150.00	0.50	\$75.00
Autry, Tanya	8	10/8/2014	Coordinate with J Emerson re information for Robert Harmon at A-1 Computers.	\$150.00	0.10	\$15.00
Autry, Tanya	8	10/8/2014	Prepare and coordinate with J Emerson and Robert Harmon re Amended Revised Declaration and email same to J Emerson.	\$150.00	0.20	\$30.00
Autry, Tanya	11	10/9/2014	Coordinate with J Emerson re status of Robert Harmon, Lissy Moore, and Tom Tuohy documents, including the questionnaire, info sheet, and retainer agreements. Pull the original documents for Mr. Harmon and Ms. Moore and scan them to the file.	\$150.00	0.10	\$15.00
Autry, Tanya	11	10/9/2014	Telephone onference with Tom Tuohy re him sending me his documents including the questionnaire, info sheet, and retainer agreement, for the file and send to Mr. Crotchett's office for processing.	\$150.00	0.20	\$30.00
Autry, Tanya	11	10/9/2014	Receive 19 individual one page faxes from Mr. Tuohy and consolidate into four complete documents and email to J Emerson. These documents are the final Declaration of Document Preservation, Receipts for Verizon Purchases, Duties of a Class Representative and Fax Cover Sheet with Client contact Information.	\$150.00	0.50	\$75.00
Autry, Tanya	8	8/10/2014	Draft and prepare to final the Motion and Proposed Order for Change of Firm Affiliation of <u>John Emerson</u> and file with the Court. Send service copies to all counsel on service list.	\$150.00	0.40	\$60.00
Autry, Tanya	8	8/10/2014	Draft and prepare to final the Motion and Proposed Order for Change of Firm Affiliation, address, and contact info for <u>Scott Poynter</u> and file with the Court. Send service copies to all counsel on service list.	\$150.00	0.40	\$60.00

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Autry, Tanya	8	9/17/2015	Coordination with Robert Harmon at A-1 Computers re new Attorney-Client Agreement for Emerson Scott, LLP, with new questionnaire, Declaration of Document Production, Duties of a Class Representative, and preservation of documents and invoices that were sent in the beginning stages of this case.	\$150.00	0.40	\$60.00
Autry, Tanya	8	9/17/2015	Coordination with J Emerson re me coordinating with Bob Harmon and sending the A-1 Computers new Attorney-Client Agreement for Emerson Scott, LLP, new questionnaire, Declaration of Document Production, Duties of a Class Representative, and preservation of documents and invoices to co-counsel.	\$150.00	0.20	\$30.00
Autry, Tanya	11	9/23/2015	Coordinate with J Emerson, Demetrius Lambrinos, Michael Caylao from CPMLEGAL and Bob Harmon re A-1 Computers (Robert S. Harmon's) Declaration of Document Preservation.	\$150.00	0.10	\$15.00
Autry, Tanya	11	9/23/2015	Call to set up meeting and drive to meet Mr. Harmon at his store in Jacksonville, AR to go over the Document Preservation Declaration and get him to sign.	\$150.00	0.70	\$105.00
Autry, Tanya	11	9/23/2015	Email Mr. Lambrinos and Mr. Caylao a copy of Mr. Harmon's signed Document Preservation Declaration (per their instructions from our conference earlier today).	\$150.00	0.10	\$15.00
AUTRY, TANYA			TOTAL		3.90	\$585.00
			TOTAL		74.70	\$53,523.00