

EXHIBIT 19

1 *Counsel for Indirect Purchaser Plaintiffs*

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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OAKLAND DIVISION

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

Case No. 13-MD-02420 YGR (DMR)

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MDL NO. 2420

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**DECLARATION OF DANIEL R. KARON
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS'
FEES AND REIMBURSEMENT OF
EXPENSES ON BEHALF OF KARON
LLC**

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This Document Relates to:

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ALL INDIRECT PURCHASER ACTIONS

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1 I, Daniel R. Karon, declare:

2 1. I am managing partner of Karon LLC 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 the Indirect Purchaser Plaintiffs throughout the
8 course of this litigation. The background and experience of Karon and its attorneys are
9 summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

14 4. During the pendency of the litigation, Karon LLC performed the following work:
15 Conducted T1 and T2 merits-based review, analysis and coding of Sony documents provided by
16 custodians Greg King, Doug Kreifles, Steve Jaska, Hameed Chaudhury, Alan Sund, Marcel
17 Vandenberg, Jisette Tran, Tomoya Hayakawa, Robert McCaul, Christopher Bourassa, Aki
18 Hasegawa, Jack Hamilton, and Ronnie Tao relating to meetings, worksheets and various other
19 matters for use in depositions and class-certification briefings.

20 5. Attached hereto as **Exhibit B** is a billing summary of Karon LLC’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
24 Karon LLC during this period of time was 277, with a corresponding lodestar based on current
25 rates of \$96,950.00 The lodestar amount reflected in Exhibit B is for work assigned by Lead
26 Counsel, and was performed by professional staff at my law firm. This summary was prepared
27 from contemporaneous, daily time records regularly prepared and maintained by Karon LLC.

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DECLARATION OF DANIEL R. KARON IN SUPPORT OF IPPS’ MOTION FOR AN
AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF
OF KARON LLC: 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.

5 8. Karon LLC expended a total of \$0.00 in unreimbursed costs and expenses in
6 connection with the prosecution of this case and is not seeking any reimbursement of costs or
7 expenses.

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

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

12 Executed on May 23, 2017 at Cleveland, Ohio.

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/s/Daniel R. Karon

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Daniel R. Karon

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EXHIBIT A

Daniel R. Karon

Karon LLC
700 W. St. Clair Ave., Suite 200
Cleveland, OH 44113-1998
Telephone: (216) 622-1851
Facsimile: (216) 241-8175
E-mail: dkaron@karonllc.com
Web: www.karonllc.com

SUMMARY

Mr. Karon is a class-action trial attorney specializing in antitrust, consumer-fraud, and wage-and-hour litigation. He began his class-action career with Much Shelist Freed Denenberg Ament & Rubenstein, P.C. in Chicago. He now manages Karon LLC. He represents individuals in antitrust, consumer-fraud, wage-and-hour, and other class-actions, and he has represented domestic and international corporations in domestic and international antitrust class-action matters. He also defends corporations in consumer-fraud class actions.

Mr. Karon teaches class-action law as a lecturer in law at Columbia Law School. He has also been a lecturer in law at Cleveland State University's Cleveland-Marshall College of Law. He lectures on class-action law at multiple other law schools and serves on Loyola University Chicago School of Law's Institute for Consumer Antitrust Studies' U.S. Advisory Board. He chairs the ABA's National Institute on Class Actions, writes a bimonthly column for Law360, was an editorial board member and contributing author to the ABA's Litigation Section's *Class Actions Today-Jurisdiction to Resolution* magazine, was a member of the Ohio Association of Justice's Board of Trustees, and served as an editorial board member for the Ohio Academy of Justice's *Ohio Trial* magazine. He has published multiple law review and bar journal articles on class-action topics, and he lectures nationally on class actions for the ABA and other bar associations.

In addition to various antitrust and consumer-fraud class actions, Mr. Karon was extensively involved in the *LCD-TFT Indirect Purchaser Antitrust Litigation* (nationwide price-fixing class action that settled for \$1.1 billion), *Vitamins Direct Purchaser Antitrust Litigation* (nationwide price-fixing class action that resolved for \$2 billion), *NASDAQ Market-Makers Antitrust Litigation* (nationwide price-fixing class action that settled for \$1.027 billion), *Cathode Ray Tubes (CRT) Antitrust Litigation* (nationwide price-fixing class action that settled for \$586 million), *Monosodium Glutamate Antitrust Litigation* (nationwide price-fixing class action that settled for \$130 million), *Methionine Antitrust Litigation* (nationwide price-fixing class action that settled for \$101 million), and *Sorbates Direct Purchaser Antitrust Litigation* (nationwide price-fixing class action that settled for \$94.5 million). He also serves or served as lead counsel in *Magnesium Oxide Antitrust Litigation*, *Aftermarket Sheet Metal Indirect Purchaser Antitrust Litigation*, *Dairy Indirect-Purchaser Antitrust Litigation*, *Johnson v. Evangelical Lutheran Church of America*, *Schwartz v. Avis Rent-A-Car Corp.*, *Klein v. Budget Rent-A-Car Group*, *Bausch & Lomb Contact Lens Product Liability Litigation* and *Schwartz v. Alltel Corp.* He was discovery co-chair in the *Bulk Graphite Antitrust Litigation*, class-certification co-chair in the *Pressure Sensitive Labelstock Antitrust Litigation*, and briefing co-chair in the *EPDM Antitrust Litigation* and *Carbon Black Antitrust Litigation*.

EDUCATION

J.D., 1991

Michael E. Moritz College of Law, The Ohio State University
Member, *The Ohio State Journal on Dispute Resolution*
Quarterfinalist, First-Year Moot Court Competition

B.A., Speech Communication, 1988

Certificate, Jewish Studies, 1988
Indiana University-Bloomington
Dean's List, 1984–1987

TEACHING EXPERIENCE

Lecturer in Law, Columbia Law School

Spring 2018

Complex litigation and class-action law

Lecturer in Law, Cleveland-Marshall College of Law, Cleveland State University

February 2005–2007

Class-action law

Lecturer, Michael E. Moritz College of Law, The Ohio State University

February 2008–Present

Class-action law

Lecturer, Columbia Law School

February 2013–2017

Class-action law

Lecturer, Vanderbilt Law School

April 2013

Class-action law

Lecturer, Notre Dame Law School

February 2015

Class-action law

Lecturer, Tulane Law School

November 2013

Class-action law

Lecturer, University of Georgia School of Law

November 2015

Class-action law

Lecturer, Benjamin N. Cardozo School of Law, Yeshiva University
April 2014
Class-action law

Lecturer, Loyola University Chicago School of Law
November 2013
Class-action law

BAR ADMISSIONS

United States Court of Appeals for the Third Circuit 2016

United States District Court for the Eastern District of Michigan, 2015

United States Court of Appeals for the Sixth Circuit 2013

United States District Court for the Southern District of Ohio, 2004

United States District Court for the Northern District of Ohio, 1998

United States Court of Appeals for the Seventh Circuit, 1995

United States District Court for the Northern District of Illinois, 1991

Ohio, 1997

Illinois, 1991

CLASS-ACTION EXPERIENCE

Karon LLC, Cleveland, OH
Owner, 2014–Present

Goldman Scarlato Karon & Penny, P.C., Cleveland, OH
Owner, 2002–2014

Gallagher Sharp Fulton & Norman, Cleveland, OH
Attorney, 2000–2002

Law Offices of Daniel R. Karon, Cleveland, OH
Owner, 1998–2000

Much Shelist Freed Denenberg Ament & Rubenstein, P.C., Chicago, IL
Attorney, 1994–1998

PUBLICATIONS

Bundle Up Defense Counsel. Winter's Coming, LAW360 IN-DEPTH (May 2, 2017)

Killing Class Actions Means Everybody Loses, THE CLS BLUE SKY BLOG—COLUMBIA LAW SCHOOL'S BLOG ON CORPORATIONS AND THE CAPITAL MARKETS, (Apr. 7, 2017)

The Death of Class Actions?, ACSBLOG, AMERICAN CONSTITUTION SOCIETY (Mar. 3, 2017)

Killing Class Actions Means Everybody Loses, LAW360 (Mar. 17, 2017)

The Class Action Fairness Act: Law and Strategy, Chapter 9 (2016)

The "Fairness" in Class Action Litigation Act, 42:4 LITIGATION 8 (Summer 2016)

Editorial, *Dow Chemical's Post-Scalia Settlement is a Spin Doctor's Delight*, THE NATIONAL LAW JOURNAL, SUPREME COURT BRIEF (Apr. 25, 2016)

Editorial, *Dow Chemical's Post-Scalia Settlement is a Spin Doctor's Delight*, THE NATIONAL LAW JOURNAL (Apr. 25, 2016)

Editorial, *Federal Class-Action Reform Effort Courts Serious Risks*, CLEVELAND PLAIN DEALER (Nov. 20, 2015)

Is it CAFA or Kafka? Effectively Pleading Multistate Class-action cases after the Class Action Fairness Act, THE OHIO ASSOCIATION FOR JUSTICE QUARTERLY 21 (Oct. 2014)

Reflections from the 2013 National Institute on Class Actions, 24 ABA'S CLASS ACTIONS & DERIVATIVE SUITS 1 (Fall 2013)

Suspicionless Strip Searches—What's Next?, 39:1 LITIGATION 8 (Winter 2013)

Ripped from the Headlines—Ten Lawyers Look at the Story, 38:2 LITIGATION 25 (Winter 2012)

"T'was Three Years After Twombly and All Through the Bar, Not a Plaintiff Was Troubled From Near or From Far." The Unremarkable Effect of the U.S. Supreme Court's Re-expressed Pleading Standard in Bell Atlantic Corp. v. Twombly, 44 U.S.F. L. REV. 571 (2010)

The Unremarkable Effect of Bell Atlantic Corp. v. Twombly on Pleading Class—Action Complaints, 11:2 ABA'S COMM'L & BUS. LITIG. 6 (Spring 2010)

Is it CAFA or Kafka, AAJ's TRIAL MAGAZINE 24 (July 2009)

ABA's Consumer Protection Law Developments, Chapter 5 State Consumer Law, § 36 Ohio (2009).

“When Congress Gives You Lemons . . .” Plaintiffs’ Attorneys are Forced by the Class Action Fairness Act to Devise Innovative New Ways to Prosecute Interstate Class Actions, PLAINTIFF MAGAZINE 1 (Feb. 2008)

Multi-State Class Actions After CAFA—Preserving Consumers’ Rights by Pleading Creatively, ABA’S CLASS ACTIONS TODAY 9 (2007)

“How Do You Take Your Multi-State, Class action Litigation? One Lump or Two?” Infusing State Class action Jurisprudence into Federal, Multi-State Class-Certification Analyses in a “CAFA-nated” World, 46 SANTA CLARA L. REV. 567 (2006)

Unjust Enrichment’s Application to Consumer Price fixing, Class action Claims, 16 ABA’S CLASS ACTIONS & DERIVATIVE SUITS 1 (Winter 2006)

Undoing the Otherwise Perfect Crime. Applying Unjust Enrichment to Consumer Price fixing Claims, 108 W. VA. L. REV. 395 (2005)

A Non-Class-action lawyer’s Guide to Ohio Consumer Class Actions—Understanding the Basics and Recognizing Opportunities, 14:3 OHIO TRIAL 26 (2005)

Price Fixing and Market Allocation—What to Avoid, What to Watch For, 2.2 ABA’S ANTITRUST COUNSELOR 1 (2005)

“Your Honor, Tear Down that Illinois Brick Wall!” The National Movement Toward Indirect Purchaser Antitrust Standing and Consumer Justice, 30 WM. MITCHELL L. REV. 1351 (2004)

Price Fixing, Market Allocation and Bid Rigging Conspiracies: How to Counsel Your Clients to Detect Violations and Inform You of Potential Claims, 25 AMER. J. TRIAL ADVOC. 241 (2002)

Collusion Central. Helping Your Clients Deal with Price Fixers, 11:3 ABA’S BUS. L. TODAY 9 (2002)

A Practitioner’s Primer on Securities Fraud Class Action Litigation, 69:6 CLEV. BAR J. 8 (1998)

Kicking Our Gift Horse in the Mouth—Arbitration and Arbitrator Bias: Its Source, Symptoms and Solutions, 7 OHIO ST. J. ON DISP. RESOL. 315 (1992)

Winning Isn’t Everything, It’s the Only Thing. Violence in Professional Sports: The Need for Federal Regulation and Criminal Sanctions, 25 IND. L. REV. 147 (1991)

SPEAKING ENGAGEMENTS

Speaker, AAJ’s 2017 Annual Convention, “How to Grow Your Practice by Recognizing Antitrust Cases” and “The Art of Beautiful Legal Writing,” July 22, 2017, sponsored by AAJ

Speaker, AAJ Continuing Legal Education Conference, “The Future of Class Actions: Teamwork, Savvy Defense, and Smart Offense,” May 11, 2017, sponsored by AAJ

Panelist, GMA 2017 Legal Conference, “Fighting Back Against Class Action Litigation,” February 27–28, 2017, sponsored by the Grocery Manufacturers Association

Panelist, OSBA Federal Courts & Practice Committee Bench Bar Conference, “Class Certification Analysis after *Duke & Comcast*,” October 27–28, 2016, sponsored by the Ohio State Bar Association

Program Chair and Moderator, ABA’s 20th Annual National Institute on Class Actions, “‘Coming Out!’ It’s Class Actions 101,” “‘Box the Trifecta.’ Let’s Play Class Actions 301,” “‘From Mirage to Immense.’ The Genesis, Creation, and Evolution of Rule 23 with Professor Arthur Miller,” and “‘Hitting the Jackpot!’ A One-on-One Class-Action Conversation with Judge Richard Posner,” Las Vegas, NV, October 19–20, 2016, sponsored by the ABA’s Litigation Section’s Class Action and Derivative Suits Committee

Panelist, “No BigLaw? No Problem! How Small-Firm Plaintiff and Defense Lawyers Are Managing Some of the Largest Class-Action Litigation Matters,” May 27, 2016, sponsored by the ABA

Panelist, “Cross-Industry Interdisciplinary Summit on Class Actions,” New York, NY, April 11–12, 2016, sponsored by American Conference Institute

Panelist, “Is this CAFA or Kafka? Multi-State Actions in a Time of Metamorphosis,” Litigation Section Annual Conference, Chicago, IL, April 14, 2016, sponsored by the ABA

Program Chair and Moderator, ABA’s 19th Annual National Institute on Class Actions, “‘Who Dat?’ It’s the Return of Class Actions 101 and Class Actions 201” and “You Have a Choice, *Picayune*—‘Economic Loss’ or ‘No-Injury’ Class Actions. Either Way, Does a Legal Claim Exist?” New Orleans, LA, October 22–23, 2015, sponsored by the ABA’s Litigation Section’s Class Action and Derivative Suits Committee

Program Chair, “Antitrust for Non-Antitrust Lawyers: How to Grow Your Business by Recognizing New Opportunities,” National Teleseminar, January 15, 2015, sponsored by American Association for Justice

Program Chair and Moderator, ABA’s 18th Annual National Institute on Class Actions, “Second to None. Class Actions 101” and “Who Needs *The Second City*?” Class Certification from A(kroyd) to (Lovit)Z: A Three-Act Play,” Chicago, IL, October 23–24, 2014, sponsored by the ABA’s Litigation Section’s Class Action and Derivative Suits Committee

Lecturer, Ohio Association of Justice’s Annual Convention, “Class Actions for Non-Class Action Attorneys. How to Grow Your Business by Recognizing New Opportunities,” Columbus, OH, May 8, 2014, sponsored by Ohio Association for Justice

Panelist, Article III Standing and Rule 23(b)(3) Certification: Emerging Litigation Trends, December 3, 2013, National Teleseminar, sponsored by Strafford Publications

Program Chair and Moderator, ABA's 17th Annual National Institute on Class Actions, "Listen Co-Counsel, You'll Learn a Ton, It's Time for Class Actions 101" and "'Show Me the Money!!! . . . or Don't.' *Cy Pres* Recoveries, Requests for Attorneys' Fees, and Does This Amount to a Hill of Beans?" Boston, MA, October 23–24, 2013, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, Ohio State Bar Association's 2012 Great Lakes Antitrust Institute, "New Developments in Antitrust Law," Columbus, OH, November 2, 2012, sponsored by the Ohio State Bar Association

Program Chair and Moderator, ABA's 16th Annual National Institute on Class Actions, "'The Class Definition that Works . . . or Does It?' Strategies for Pleading and Attacking Class Definitions—The Most Basic and Most Ignored Step in a Class-action lawsuit's Success or Failure," Chicago, IL October 25, 2012, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Program Chair and Moderator, "Reexamining the Class Action Practice and Considering Where it—Indeed, *We*—Go From Here," Chicago, IL, August 3, 2012, sponsored by the ABA

Moderator and Panelist, "Everything MDL. First-Hand Perspectives from MDL Panel Judges, MDL District Court Judges, and MDL Lawyers," Cleveland, OH, July 25, 2012, sponsored by the Cleveland Metropolitan Bar Association and the Federal Bar Association, Northern District of Ohio Chapter

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, January 31, 2012, sponsored by Strafford Publications

Panelist, "Trends in Federal Circuit Class Certification Rulings," National Teleseminar, January 19, 2012, Law Seminars International

Program Chair and Moderator, ABA's 15th Annual National Institute on Class Actions, "The Practice that Never Sleeps: Reexamining the Class action Practice and Considering Where it—Indeed, *We*—Go From Here," New York, NY, October 14, 2011, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, *Wal-Mart v. Dukes*, Practical Implications of the Supreme Court's Landmark Class Action Ruling, National Teleseminar, June 30, 2011, sponsored by Law Seminars International

Panelist, ABA's 59th Annual Antitrust Law Spring Meeting, "Guilt by Association? Trade Associations, Cartel Investigations, and *Twombly*," Washington, D.C., March 30, 2011, sponsored by the ABA's Antitrust Law Section

Panelist, "Pleading and Defending Class Actions: Leveraging the Latest Developments in CAFA Removal Jurisdiction," National Teleseminar, December 8, 2010, sponsored by Strafford Publications

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, November 2, 2010, sponsored by Strafford Publications

Program Chair and Moderator, ABA's 14th Annual National Institute on Class Actions, "The Standard that Works . . . or Does It? Deciding Choice-of-Law and Reliance/Causation/Deception Standards in Multistate, Consumer fraud Class actions After CAFA," Chicago, IL, October 14, 2010, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "Consumer Class action Litigation: Leveraging New Developments in Class Certification, Causation, and Reliance," National Teleseminar, April 20, 2010, sponsored by Strafford Publications

Panelist and Moderator, ABA's 13th Annual National Institute on Class Actions, "A Funny Thing Happened on the Way to the Courthouse . . . I Had to Litigate an Arbitration Clause! Crafting, Opposing, and Arguing Arbitration Clauses and Class action Waivers in Three Scenes," Washington DC, November 20, 2009, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist and Moderator, ABA's 13th Annual National Institute on Class Actions, A Funny Thing Happened on the Way to the Courthouse . . . I Had to Litigate an Arbitration Clause! Crafting, Opposing, and Arguing Arbitration Clauses and Class action Waivers in Three Scenes, San Francisco, CA, October 30, 2009, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, August 11, 2009, sponsored by Strafford Publications

Panelist, "It Ain't Over 'Till it's Over: Litigating Class Actions After Class Certification and Before Trial," National Teleseminar, May 27, 2009, sponsored by ABA Litigation Section

Panelist, "Antitrust 101: Understanding, Pleading, and Defending Price fixing Claims," ABA Brown Bag Teleseminar, February 18, 2009, sponsored by the ABA's Section on Litigation

Panelist, "Pleading, Defending, and Settling Class Actions. Emerging Trends," National Teleseminar, December 9, 2008, sponsored by Strafford Publications

Panelist, Ohio State Bar Association's 2008 Antitrust Program, "When Opportunity Knocks Growing Your Business or Company's Bottom Line by Recognizing When, Whether, and How to Pursue Class action, Price fixing Claims," Columbus, OH, November 14, 2008, sponsored by the Ohio State Bar Association

Panelist and Moderator, ABA's 12th Annual National Institute on Class Actions, "I Could Have Sworn It was CAFA, *not Kafka!* The Metamorphosis of Pleading, Defending, and Settling Multi-State Class Actions—A Surreal-Life, Three-Act Play," New York, NY, November 7, 2008, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, October 31, 2008, sponsored by the Cleveland Bar Association

Panelist, “Pleading, Defending, and Settling Class Actions. Emerging Trends,” National Teleseminar, May 13, 2008, sponsored by Strafford Publications

Panelist, Ohio Association for Justice’s 2008 Annual Convention, “New Developments in Plaintiffs’ Antitrust Law,” Columbus, OH, May 9, 2008, sponsored by the Ohio Association for Justice

Lecturer, “Class Actions for Non-Class-action lawyers. Growing Your Business by Understanding the Basics and Recognizing Opportunities,” Los Angeles, CA, February 21, 2008, sponsored by the Los Angeles County Bar Association

Panelist, “Class Action Removal Standards in Flux. New Litigation Strategies for Plaintiff and Defense Counsel,” National Teleseminar, February 19, 2008, sponsored by Strafford Publications

Panelist and Moderator, ABA’s 11th Annual National Institute on Class Actions, “The Nationwide Class: White Elephant, Endangered Species, or Alive and Well?” Chicago, IL, October 19, 2007, sponsored by the ABA’s Litigation Section’s Class Action and Derivative Suits Committee

Panel Co–Chair, ABA’s 2007 Annual Meeting, “‘Is this CAFA or Kafka?’ Multi–State Class Actions in a Time of Metamorphosis—A Surreal-Life, Three-Act Play,” San Francisco, CA, August 9–12, 2007, sponsored by the ABA

Panelist, ABA’s 2007 Litigation Section Annual Conference, “The Last Laugh-Perspectives on CAFA,” San Antonio, TX, April 11–14, 2007, sponsored by the ABA

Lecturer, “Class Actions for Non–Class-action lawyers,” Los Angeles, CA, February 23, 2007, sponsored by the Los Angeles County Bar Association

Moderator, ABA’s 10th Annual National Institute on Class Actions, Chicago, IL, October 27, 2006, sponsored by the ABA’s Litigation Section’s Class Action and Derivative Suits Committee

Lecturer, “The Business Litigation Seminar,” Cleveland, OH, June 21, 2006, sponsored by the Cleveland Bar Association

Featured Speaker, “Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business—How to Avoid Being a Victim,” Cleveland, OH, June 16, 2006, sponsored by the Cleveland Chemical Association

Lecturer, “Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities,” Cleveland, OH, June 6, 2006, sponsored by the Cleveland Bar Association

Lecturer/Panelist, “Civil Practice and Litigation Techniques in Federal and State Courts,” Charleston, SC, May 31, 2006, sponsored by ALI-ABA

Lecturer, “Class Actions for Non–Class-action lawyers,” Los Angeles, CA, February 25, 2006, sponsored by the Los Angeles County Bar Association

Lecturer, “Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities,” Cleveland, OH, December 6, 2005, sponsored by the Cleveland Bar Association

Lecturer, “Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities,” Cleveland, OH, November 18, 2005, sponsored by the Cuyahoga County Bar Association

Featured Speaker, “Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business—How to Avoid Being a Victim,” Pittsburgh, PA, November 11, 2005, sponsored by the Pittsburgh Chemical Association

Moderator, “ABA’s 9th Annual National Institute on Class Actions,” Chicago, IL, September 23, 2005, sponsored by the ABA’s Litigation Section’s Class Action and Derivative Suits Committee

Featured Speaker, “Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business—How to Avoid Being a Victim,” Cleveland, OH, September 16, 2005, sponsored by the Cleveland Chemical Association

Featured Speaker, “Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business—How to Avoid Being a Victim,” Vail, CO, July 26, 2005, sponsored by the OC Chemical Dealers’ Association

Lecturer, “Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities,” Cleveland, OH, May 20, 2005, sponsored by the Cleveland Bar Association

Lecturer, “Class Actions for Non-Class-action lawyers,” Miami, FL, May 13, 2005, sponsored by Lighthouse Seminar Group, Dallas, TX

Lecturer, “Class Actions for Non-Class-action lawyers: Understanding the Basics and Recognizing Opportunities,” Phoenix, AZ, March 25, 2005, sponsored by the Maricopa County Bar Association

Lecturer, “Class Actions for Non-Class-action lawyers,” Chicago, IL, January 21, 2005, sponsored by Lighthouse Seminar Group, Dallas, TX

Lecturer, “Recognizing Class Action Opportunities,” Columbus, OH, December 12, 2004, sponsored by the Columbus Bar Association

Lecturer, “Class Actions: Understanding the Basics and Recognizing Opportunities,” Cleveland, OH, May 28, 2004, sponsored by the Cleveland Bar Association

Lecturer, “Select Topics for Trial Lawyers, A Primer on Class Actions for the Non-Class Action Litigator in New York,” New York, NY, August 11, 2004, sponsored by Lorman Educational Services, Eau Claire, WI

Lecturer, “The Business Litigation Seminar—Advanced Tactics and Motions,” Cleveland, OH, December 12, 2003, sponsored by the Cleveland Bar Association

Lecturer, “Community Litigation Workshop,” Detroit, MI, June 5, 1998, sponsored by the Firearms Litigation Clearinghouse, Washington D.C.

PROFESSIONAL ACTIVITIES

American Bar Association, 2003–Present

Chairperson, National Institute on Class Actions, 2010–Present

Litigation Section, Co-Chair, Class Action and Derivative Suits Committee’s Antitrust Subcommittee, 2007–2008

Antitrust Section, 2008–2010

Contributor, A. Scalia & B. Garner, *Reading Law: The Interpretation of Legal Texts* (2012)

Law360, Columnist, 2017–Present

American Society of Writers on Legal Subjects, 2004–Present

Law Review Award Committee, 2004–2009

Brief-Writing Committee, 2004–2009

American Association for Justice, 1998–Present

Co-Vice Chair, Class Action Litigation Group, 2016–Present

Secretary, Class Action Litigation Group, 2015–2016

Co-Chair, Antitrust Subcommittee, 2016–Present

Vice Co-Chair, Antitrust Subcommittee, 2015–2016

ABA Liaison Committee, 2014–Present

Rule 23 Subcommittee, 2014–Present

Class Action Trial Lawyers’ Association, 2011–Present

Executive Committee, 2011–Present

Cleveland Bar Association, 1997–2009

National Association for Consumer Advocates, 2003–Present

BOARD MEMBERSHIPS AND CIVIC ACTIVITIES

Ohio Association for Justice, 2003–Present

Board of Trustees, 2012–2016

Chair, Consumer Law Section, 2014–2016

Cleveland Metropolitan Bar Association, Multidistrict Litigation Task Force, 2010–2012

Loyola University Chicago School of Law, Institute for Consumer Antitrust Studies’ U.S. Advisory Board, 2004–Present

IUvisors Student Advisors, Indiana University Alumni Foundation, 2014–Present

Antitrust Section Council Member, Ohio State Bar Association, 2007–Present
Great Lakes Antitrust Institute Planning Committee, 2013

Cleveland Legal Aid Society
Volunteer Attorney, 2014–2016

Public Justice, 2011–Present

Editorial Board, Ohio Academy of Trial Lawyers' *Ohio Trial Magazine*, 2004–2010

Class Action Advisory Board, Strafford Legal Publications, 2008–Present

Editorial Board, American Bar Association, Litigation Section's *Class Actions Today. Jurisdiction to Resolution* (special publication), 2007–2008

Assistant Coach, Northern Ohio Warriors Traveling Youth Baseball Club, 2014–2016

Fellow, Litigation Counsel of America Trial Lawyer Honorary Society, 2008–2010

Women's Community Foundation, Men's Executive Committee, 2004–2010

Judge, Landskroner Foundation for Children's 9th Annual Law Student Closing Argument Competition, 2007

Anti-Defamation League's Steinberg Leadership Institute, 1998–2000

Associate Attorney's Committee Co-Chair, Lawyers' Division, Jewish Federation of Metropolitan Chicago, 1995–1997

DePaul University College of Law, Moot Court Judge, 1993–1994

Sigma Alpha Mu, Sigma Zeta Housing Corporation, 2004–2009

Young Leadership Board, Jewish Federation of Metropolitan Chicago, 1993–1997

Young Leadership Board, Jewish Community Federation of Cleveland, 1997–2000

HONORS AND AWARDS

Norvelle Scholarship for Academic Excellence, Indiana University, 1986

Ohio Super Lawyer, 2012–Present

Global Directory of Who's Who (Top Lawyer), 2015–Present

ABA Center for Professional Development Partner Appreciation Award Winner for Most Innovative Presentation, 2015

ABA Award for Outstanding Subcommittee Chair for the Class Actions & Derivative Suits Committee 2010–2011

Top Attorneys of North America, 2017–Present

EXHIBIT B

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

Firm Name: Karon LLC

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
Natalie Kabasakalian (OC)							277.00								277.00	\$350.00	\$96,950.00
															0.00	\$0.00	\$0.00
SUB-TOTAL															0.00	\$0.00	\$0.00
	0.00	0.00	0.00	0.00	0.00	0.00	277.00	0.00	277.00		\$96,950.00						
SUB-TOTAL																	
GRAND TOTAL:															0.00	\$0.00	\$0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		\$0.00						
	0.00	0.00	0.00	0.00	0.00	0.00	277.00	0.00	277.00		\$96,950.00						

EXHIBIT C

EXHIBIT D

LIB Indirect Litigation

Karon LLC

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(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
<u>Timekeeper: Kabasakalian</u>						
LIB Indirect	Kabasakalian	10/1/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000017367-000017472, Sony custodian Hameed Chaudhury, Bates Nos. SONY-LIB000020763-000020777, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000021556-000021571.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/2/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000021572-000021586, Sony custodian Greg King, Bates Nos. SONY-LIB000021944-000021983, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022530-000022529.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/3/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022532-000022599.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/6/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000023951-000024052.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/7/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000025071-000025099, Sony Custodian Marcel VandenBogert, Bates Nos. SONY-LIB000026016-000026023.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/8/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Marcel VandenBogert, Bates Nos. SONY-LIB000026024-000026052, Sony Custodians Alan Sund and Jisette Tran, Bates Nos. SONY-LIB 000037153-000037155, Sony custodian Alan Sund, Bates Nos. SONY-LIB000037156-000037168.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/9/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Alan Sund and Jisette Tran, Bates No. SONY-LIB000037171, Sony custodian Alan Sund, Bates Nos. SONY-LIB000037172-000037176, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000039125-000039127, Sony custodian Greg King, Bates Nos. SONY-LIB000039282-000040344.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/10/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000040399-000040405, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041980-000042082, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000068243-68250, Sony custodian Hameed Chaudhury, Bates No. SONY-LIB0000688222, Sony custodian Steve Jaska, Bates Nos. SONY-LIB0000069812-000069817.	4.00	\$1,400.00

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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	10/13/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000070126-000070305, Sony custodian Christopher Bourassa, Bates No. SONY-LIB000070948, Sony custodian Alan Sund, Bates Nos. SONY-LIB000072366-000072411, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000082683-000082684, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000085406-000090013, Sony custodians Robert McCaul, Alan Sund, and Steve Jaska, Bates Nos. SONY-LIB000091744-000091756, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000091758-000098330.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/14/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Hameed Chaudhury, Bates No. SONY-LIB000105146, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000105200, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000105406-000105417, Sony custodian Greg King, Bates Nos. SONY-LIB000105464-000105469, Sony custodian Doug Kreifles, Bates No. SONY-LIB000105742, Sony custodian Alan Sund, Bates Nos. SONY-LIB000109963-000110052, Sony custodian Steve Jaske, Bates Nos. SONY-LIB000123072-000123256, Sony custodians Robert McCaul and Alan Sund, Bates No. SONY-LIB000129965, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000105200N, Sony custodian Steve Jaska, Bates No. 000123258N, Sony custodian Robert McCaul, Bates Nos. 000070126N-000070301N.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/15/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates No. 000123281, Sony custodian Robert McCaul, Bates No. 000125313, Sony custodians Robert McCaul and Alan Sund, Bates No. SONY-LIB 000129965, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000105200N, Sony custodian Steve Jaska, Bates No. SONY-LIB000123258N, Sony custodian Robert McCaul, Bates Nos. SONY-LIB00070126N-000070301N, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000082683N-00008330N.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/16/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakaw, Bates Nos. SONY-LIB000141584-000141585, Sony custodian Greg King, Bates Nos. SONY-LIB000143370, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000157802-000157804, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000159048-000185856.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/17/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000185856-000157894N, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000159051N-000185856N, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000050583-000052501.	4.00	\$1,400.00

LIB Indirect Litigation

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(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	10/20/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000053801-000053951.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/21/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054001-000054088, Sony custodian Greg King, Bates Nos. SONY-LIB000055135-000055796.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/22/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000055798-000055831, Sony custodian Alan Sund, Bates Nos. SONY-LIB000058961-000059016.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/23/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000059017-000062162, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000066130-67556.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/24/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000058961N-000059151N, Sony custodian Greg King, Bates Nos. SONY-LIB000039283-000039284, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041816-000041871.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/27/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041773-000041890, Sony custodian Chaudhury Hameed, Bates Nos. SONY-LIB000068823-000041921.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/28/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000059087-00005907N, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022579-000022568, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041942, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022567, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000017447-000017451.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/29/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000061903-000079317N, Sony custodian Alan Sund, Bates Nos. SONY-LIB000059046-0000109973N.	4.00	\$1,400.00

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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	10/30/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Jack Hamilton, Bates Nos. SONY-LIB000019549-000019556, Sony custodian Jisette Tran, Bates Nos. SONY-LIB000075693-000075701, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000081009-000081024N, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000045245-000042005.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	10/31/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Jack Hamilton, Bates Nos. SONY-LIB000019607-000019562, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000078068-000076301, Sony custodian Robert McCaul, Bates Nos. SONY-LIB0000127619-0000127619N.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/3/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000075944-000059090, Sony custodian Steve Jaske, Bates Nos. SONY-LIB000114275-000114274N, Sony custodian Jack Hamilton, Bates Nos. SONY-LIB000019637-000019644, Sony custodians Greg King and Steve Jaska, Bates No. SONY-LIB000055039.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/4/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000037177-000081545, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000081433-81403.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/5/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tran Jisette, Bates Nos. SONY-LIB000075592-000075633, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000077947-000069808.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/6/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000068238-000068238N, Sony custodian Greg King, Bates Nos. SONY-LIB0000105454-0000105459, Sony custodian Chaudhury Hameed, Bates Nos. SONY-LIB000020804-000020787, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000055030-000055031, Sony custodian Alan Sund, Bates Nos. SONY-LIB000072907-000072963.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/7/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000072963-00007560, Sony custodian Jisette Tran, Bates Nos. SONY-LIB000075662-000075677, Sony custodian Alan Sund, Bates Nos. SONY-LIB0000072964N-000073085N.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/10/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg King, Bates No. SONY-LIB0000143371, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000037949-unnumbered document.	4.00	\$1,400.00

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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	11/11/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/12/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/13/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/14/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Greg King, Aki Hasegawa, Robert McCaul – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/17/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Christopher Bourassa, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/18/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/19/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Robert McCaul, Alan Sund, Hameed Chaudhury, Christopher Bourassa, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, company background, Internet HTMLs, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/20/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Adobe Acrobat (PDF), expense and travel records, company background, Microsoft Excel 2000, phone records/directories/Rolodex, expense and travel records (Bates numbers unavailable).	4.00	\$1,400.00

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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	11/21/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, Christopher Bourassa, Marcel VandenBogert, Doug Kreifles, Greg King, Aki Hasegawa – Adobe Acrobat (PDF), expense and travel records, phone records/directories/Rolodex, calendars, diaries, dayplanners, Microsoft Outlook Message File, outlook appointment (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	11/24/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Marcel VandenBogert, Christopher Bourassa, Steve Jaska, Robert McCaul, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files(Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/2/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, Alan Sund, Greg King, Aki Hasegawa – Outlook appointments, Adobe Acrobat (PDF), calendars, diaries, dayplanners, Microsoft message files, Microsoft PowerPoint 97/98 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/3/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Christopher Bourassa, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/4/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Robert McCaul, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/5/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Robert McCaul, Aki Hasegawa, Doug Kreifles – prices/policy pricing, Adobe Acrobat (PDF), Outlook appointments, Microsoft PowerPoint 97/98, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/8/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Alan Sund, Doug Kreifles – plain textcalendars, diaries, dayplanners, Adobe Acrobat (PDF), Microsoft message files (Bates numbers unavailable).	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/9/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, 000089327-000089470.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/10/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, 000065512-000170046.	4.00	\$1,400.00

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(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	12/11/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054574-000054538.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/12/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054546-000105394.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/15/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000105395-000105401, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000023719-000159191, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000148971-000105209N.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/16/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000021483-000039256, Sony custodian Greg King, Bates Nos. SONY-LIB000039462-000039466.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/17/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg King, Bates Nos. SONY-LIB000039444-000039425, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000190068-000144865, Sony custodian Greg King, Bates Nos. SONY-LIB000039423-000039395.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/18/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg King, Bates Nos. SONY-LIB000039396-000039394, Sony custodian Alan Sund, Bates Nos. SONY-LIB000025077-000040652, Sony custodian Robert McCaul, Bates No. SONY-LIB000023965, Sony custodian Greg King, Bates Nos. SONY-LIB000039393-000039403.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/19/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB0000129942-00013042, Sony custodian Greg King, Bates Nos. SONY-LIB000039389-000039392, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000070134-000040505.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/22/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000023969-000174491, Sony custodian Greg King, Bates No. SONY-LIB 000039294, Sony custodian Robert McCaul, Bates No. SONY-LIB 000023979, Sony custodian Greg King, Bates Nos. SONY-LIB000039296 -000039301, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB 0000105208, Sony custodian Greg King, Bates Nos. SONY-LIB000039289-000039305, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000070140-000039304, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054080-000054082.	4.00	\$1,400.00

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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	12/23/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000144908-000056124, Sony custodian Greg King, Bates No. SONY-LIB000039311, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054052-0000540521.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/24/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054022-000054024, Sony custodian Greg King, Bates Nos. SONY-LIB000039276-000105461.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/29/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates No. SONY-LIB000024011, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000036901-000105382.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/30/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000105450-000084965, Sony custodian Greg King, Bates Nos. SONY-LIB000039375-000039385, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000123280-000123280N, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000053946, Sony custodian Robert McCaul, Bates Nos. SONY-LIB0000174552-000174527.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	12/31/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000174528-000174502N.	2.00	\$700.00
LIB Indirect	Kabasakalian	1/4/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Jisette Tran, Bates Nos. SONY-LIB00115240-000115244, Sony custodian Greg King, Bates Nos. SONY-LI 000039380-000039382.	8.00	\$2,800.00
LIB Indirect	Kabasakalian	1/5/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000123264-00008201, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106177-000106172, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062186-000105424.	4.00	\$1,400.00

LIB Indirect Litigation

Karon LLC

Detailed Time Report

06-01-13 thru 02-28-17

(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	1/6/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Emi Crochiere, Bates No. SONY-LIB000058510, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000039260-000123279, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106181-000196182, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB0001053880, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106167-000123009, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000127031-000089940, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000122942-000082027, Sony custodian Jisette Tran, Bates Nos. SONY-LIB000115280-000061758.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	1/8/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062418-000123278N, Sony custodian Alan Sund, Bates Nos. SONY-LIB000024936-000024949, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000171089-000090122.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	1/11/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000024926-000024925, Sony custodian Tomota Hayakawa, Bates Nos. SONY-LIB000071835-000071836N.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	1/12/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates No. SONY-LIB0000105448, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022891-000022890, Sony custodian Alan Sund, Bates Nos. SONY-LIB000072783-000072784N, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB00016184-000022884, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022885-000022886, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000058452-000058455.	4.00	\$1,400.00
LIB Indirect	Kabasakalian	1/26/2015	07 - Document Review	Conducted I1 and I2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000123256-000157800, Sony custodian Robert McCaul, Bates No. SONY-LIB000022883, Sony custodian Steve Jaska, Bates No. SONY-LIB000062161, Sony custodian Alan Sund, Bates No. SONY-LIB000040541, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062169-000062184, Sony custodian Alan Sund, Bates Nos. SONY-LIB000040540-000052385.	3.00	\$1,050.00
LIB Indirect	Kabasakalian	1/27/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022875-000022862, Sony custodian Alan Sund, Bates Nos. SONY-LIB000073134-000073150N, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022858-000022851.	3.00	\$1,050.00

LIB Indirect Litigation

Karon LLC

Detailed Time Report

06-01-13 thru 02-28-17

(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	1/28/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022847-000022811.	3.00	\$1,050.00
LIB Indirect	Kabasakalian	1/29/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000109954-000109952, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106180-00061832, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022801-00022809, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062117-000062118, Sony custodian Ronnie Tao, Bates No. SONY-LIB000106185, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062111-00062109, Sony custodian Emi Crochiere, Bates No. SONY-LIB000058496, Sony custodian Steve Jaska, Bates No. SONY-LIB000062119, Sony custodian Alan Sund, Bates No. SONY-LIB000058950, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062121-000062113, Sony custodian Greg King, Bates No. SONY-LIB000039386.	3.00	\$1,050.00
LIB Indirect	Kabasakalian	1/30/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg Kind, Bates Nos. SONY-LIB000040276-000040330, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022635-000022653, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054018-000054014, Sony custodian Greg King, Bates No. SONY-LIB000143453.	3.00	\$1,050.00
Total: Kabasakalian					277.00	\$96,950.00
Grand Total					277.00	\$96,950.00