

# **EXHIBIT 20**

*Counsel for Indirect Purchaser Plaintiffs*

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

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

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

MDL NO. 2420

**This Document Relates to:**

**ALL INDIRECT PURCHASER ACTIONS**

**DECLARATION OF ERIC A. GROVER  
IN SUPPORT OF INDIRECT  
PURCHASER PLAINTIFFS' MOTION  
FOR AN AWARD OF ATTORNEYS'  
FEES AND REIMBURSEMENT OF  
EXPENSES ON BEHALF OF KELLER  
GROVER LLP**

1 I, ERIC A. GROVER, declare:

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

7 2. My firm has served as counsel to Richard Johns and as counsel for IPPs throughout  
8 the course of this litigation. Keller Grover LLP specializes in matters involving antitrust,  
9 consumer protection, data privacy and plaintiffs'-side employment issues. Keller Grover's two  
10 partners (each of whom has more than twenty five years of experience) have recovered hundreds  
11 of millions of dollars on behalf of class members. The firm is also active in the area of  
12 whistleblower and *qui tam* actions. Lawyers in the firm regularly litigate matters throughout  
13 California and around the United States.

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

18 4. During the pendency of the litigation, Keller Grover LLP performed the following  
19 work: extensive document review from the voluminous documents produced by Defendants in this  
20 case, responding to written discovery, including interrogatories, and preparing and defending the  
21 full-day deposition of Keller Grover’s client, Richard Johns.

22 5. Attached hereto as **Exhibit A** is a billing summary of Keller Grover LLP’s total  
23 hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017.  
24 Counsel for Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment  
25 of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent  
26 by Keller Grover LLP during this period of time was 942.30, with a corresponding lodestar of  
27 \$290,370.00. The lodestar amount reflected in Exhibit A is for work assigned by Lead Counsel,

28  
DECLARATION OF ERIC A. GROVER IN SUPPORT OF IPPTS’ MOTION FOR AN AWARD  
OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF  
KELLER GROVER LLP; Case No. 13-md-02420-YGR (DMR)

1 and was performed by professional staff at my law firm. This summary was prepared from  
2 contemporaneous, daily time records regularly prepared and maintained by Keller Grover LLP.

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

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

8 8. Attached hereto as **Exhibit D** is a summary of the expenses Keller Grover LLP has  
9 incurred during the course of this litigation. Keller Grover LLP expended a total of \$2,726.95 in  
10 unreimbursed costs and expenses in connection with the prosecution of this case. These expenses  
11 were incurred on behalf of IPPs by Keller Grover LLP on a contingent basis and have not been  
12 reimbursed. The expenses reflected in **Exhibit D** were prepared from expense vouchers, receipts,  
13 and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

18 Executed on 23<sup>rd</sup> of May, 2017 at San Francisco, California.

19  
20 /s/ Eric A. Grover

21 \_\_\_\_\_  
ERIC A. GROVER

**ATTESTATION**

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

By: /s/ Steven N. Williams

Steven N. Williams

**EXHIBIT A****IN RE: LITHIUM ION BATTERIES INDIRECT  
REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES**Firm Name: **KELLER GROVER LLP**

Reporting Period: June 1, 2013 to 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

| ATTORNEYS               | 1           | 2           | 3           | 4           | 5            | 6           | 7             | 8           | 9           | 10          | 11          | 12          | 13          | 14          | TOTAL<br>HOURS | HOURLY<br>RATE  | TOTAL<br>LODESTAR   |
|-------------------------|-------------|-------------|-------------|-------------|--------------|-------------|---------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|----------------|-----------------|---------------------|
| Kathleen R. Scanlan (A) | 0.00        | 0.00        | 2.00        | 0.00        | 11.50        | 0.00        | 0.00          | 0.00        | 9.00        | 0.00        | 2.80        | 0.30        | 0.00        | 0.00        | 25.60          | \$600.00        | \$15,360.00         |
| Rachel Perez (A)        | 0.00        | 0.00        | 0.00        | 0.00        | 0.00         | 0.00        | 916.70        | 0.00        | 0.00        | 0.00        | 0.00        | 0.00        | 0.00        | 0.00        | 916.70         | \$300.00        | \$275,010.00        |
|                         |             |             |             |             |              |             |               |             |             |             |             |             |             |             | 0.00           | \$0.00          | \$0.00              |
|                         |             |             |             |             |              |             |               |             |             |             |             |             |             |             | 0.00           | \$0.00          | \$0.00              |
|                         |             |             |             |             |              |             |               |             |             |             |             |             |             |             | 0.00           | \$0.00          | \$0.00              |
| <b>SUB-TOTAL</b>        | <b>0.00</b> | <b>0.00</b> | <b>2.00</b> | <b>0.00</b> | <b>11.50</b> | <b>0.00</b> | <b>916.70</b> | <b>0.00</b> | <b>9.00</b> | <b>0.00</b> | <b>2.80</b> | <b>0.30</b> | <b>0.00</b> | <b>0.00</b> | <b>942.30</b>  | <b>\$900.00</b> | <b>\$290,370.00</b> |
|                         |             |             |             |             |              |             |               |             |             |             |             |             |             |             |                |                 |                     |
| NON-ATTORNEYS           |             |             |             |             |              |             |               |             |             |             |             |             |             |             |                |                 |                     |
|                         |             |             |             |             |              |             |               |             |             |             |             |             |             |             | 0.00           | \$0.00          | \$0.00              |
|                         |             |             |             |             |              |             |               |             |             |             |             |             |             |             | 0.00           | \$0.00          | \$0.00              |
| <b>SUB-TOTAL</b>        | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b>  | <b>0.00</b> | <b>0.00</b>   | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b> | <b>0.00</b>    | <b>\$0.00</b>   | <b>\$0.00</b>       |
| <b>GRAND TOTAL:</b>     | <b>0.00</b> | <b>0.00</b> | <b>2.00</b> | <b>0.00</b> | <b>11.50</b> | <b>0.00</b> | <b>916.70</b> | <b>0.00</b> | <b>9.00</b> | <b>0.00</b> | <b>2.80</b> | <b>0.30</b> | <b>0.00</b> | <b>0.00</b> | <b>942.30</b>  | <b>\$900.00</b> | <b>\$290,370.00</b> |

## **EXHIBIT B**

## In re Lithium Ion Batteries Antitrust Litigation

**KELLER GROVER LLP**

[illegible]

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Slip Listing

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## Selection Criteria

Clie.Selection Include: Li-Ion Batterie  
 Slip.Transaction Date 6/1/2013 - 2/28/2017  
 Time.Selection Include: K. Scanlan; R. Perez

Rate Info - identifies rate source and level

| Slip ID  | Dates and Time | Timekeeper      | Units     | Rate        | Slip Value |
|--|----------------|-----------------|-----------|-------------|------------|
| Posting Status   |                | Activity        | DNB Time  | Rate Info   |            |
| Description  |                | Client          | Est. Time | Bill Status |            |
|  |                | Reference       | Variance  |             |            |
| 67032  | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/10/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents regarding motion to dismiss; amended complaint in preparation of reviewing documents (1.50); participated in training conference call (6.50). |                |                 | 0.00      |             |            |
| 67033  | TIME           | R. Perez        | 7.00      | 300.00      | 2100.00    |
| 3/11/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed conference materials and completed review of amended complaint in preparation of reviewing documents (2.00); document review (5.00).                    |                |                 | 0.00      |             |            |
| 67034  | TIME           | R. Perez        | 7.00      | 300.00      | 2100.00    |
| 3/12/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001.  |                |                 | 0.00      |             |            |
| 67036  | TIME           | R. Perez        | 4.00      | 300.00      | 1200.00    |
| 3/13/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001.  |                |                 | 0.00      |             |            |
| 67038  | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/14/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001.  |                |                 | 0.00      |             |            |
| 67039  | TIME           | R. Perez        | 7.75      | 300.00      | 2325.00    |
| 3/17/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001.  |                |                 | 0.00      |             |            |
| 67041  | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/18/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP  |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001.  |                |                 | 0.00      |             |            |



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Slip Listing

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| Slip ID                                   | Dates and Time | Timekeeper      | Units     | Rate        | Slip Value |
|---|----------------|-----------------|-----------|-------------|------------|
| Posting Status                            |                | Activity        | DNB Time  | Rate Info   |            |
| Description                               |                | Client          | Est. Time | Bill Status |            |
|   |                | Reference       | Variance  |             |            |
| 67042                                     | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/19/2014                                 |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 67043                                     | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/20/2014                                 |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 67044                                     | TIME           | R. Perez        | 7.00      | 300.00      | 2100.00    |
| 3/21/2014                                 |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 67045                                     | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/24/2014                                 |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 67046                                     | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 3/25/2014                                 |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 67047                                     | TIME           | R. Perez        | 1.00      | 300.00      | 300.00     |
| 3/26/2014                                 |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 68569                                     | TIME           | R. Perez        | 4.00      | 300.00      | 1200.00    |
| 6/3/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 68570                                     | TIME           | R. Perez        | 7.00      | 300.00      | 2100.00    |
| 6/4/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 68571                                     | TIME           | R. Perez        | 7.50      | 300.00      | 2250.00    |
| 6/5/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |
| 68572                                     | TIME           | R. Perez        | 4.00      | 300.00      | 1200.00    |
| 6/6/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                                       |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch LG_EN_0001. |                |                 | 0.00      |             |            |

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Slip Listing

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| Slip ID<br>Dates and Time<br>Posting Status<br>Description                       | Timekeeper<br>Activity<br>Client<br>Reference | Units<br>DNB Time<br>Est. Time<br>Variance | Rate<br>Rate Info<br>Bill Status | Slip Value |
|--|---|--|----------------------------------|------------|
| 68573 TIME<br>6/7/2014<br>WIP<br>Reviewed documents from batch LG_EN_0001.       | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 2.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 600.00     |
| 68574 TIME<br>6/8/2014<br>WIP<br>Reviewed documents from batch LG_EN_0001.       | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 2.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 600.00     |
| 68575 TIME<br>6/9/2014<br>WIP<br>Reviewed documents from batch LG_EN_0001.       | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 8.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2400.00    |
| 68576 TIME<br>6/10/2014<br>WIP<br>Reviewed documents from batch LG_EN_0001.      | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 7.50<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2250.00    |
| 68876 TIME<br>6/11/2014<br>WIP<br>Reviewed documents from batch LG_EN_0001.      | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 7.50<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2250.00    |
| 68877 TIME<br>6/12/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 7.50<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2250.00    |
| 68878 TIME<br>6/13/2014<br>WIP<br>Review documents LG_EN_0001.                   | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 4.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 1200.00    |
| 68881 TIME<br>6/15/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 3.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 900.00     |
| 68884 TIME<br>6/16/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 6.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 1800.00    |
| 68887 TIME<br>6/17/2014<br>WIP<br>Reviewed documents from batch                  | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 6.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 1800.00    |

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| Slip ID<br>Dates and Time<br>Posting Status<br>Description                       | Timekeeper<br>Activity<br>Client<br>Reference | Units<br>DNB Time<br>Est. Time<br>Variance | Rate<br>Rate Info<br>Bill Status | Slip Value |
|--|---|--|----------------------------------|------------|
| SONY_EN_0001.  |   |  |                                  |            |
| 69602 TIME<br>6/18/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 7.50<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2250.00    |
| 69605 TIME<br>6/19/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 8.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2400.00    |
| 69606 TIME<br>6/20/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 4.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 1200.00    |
| 69607 TIME<br>6/21/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 2.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 600.00     |
| 69608 TIME<br>6/23/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 0.50<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 150.00     |
| 69609 TIME<br>6/24/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 8.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2400.00    |
| 69659 TIME<br>6/25/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 8.00<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 2400.00    |
| 69662 TIME<br>6/26/2014<br>WIP<br>Reviewed documents from batch<br>SONY_EN_0001. | R. Perez<br>(7) Doc Review<br>Li-Ion Batterie | 6.50<br>0.00<br>0.00<br>0.00               | 300.00<br>T@3                    | 1950.00    |

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2:06 PMKeller Grover LLP  
Slip Listing

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| Slip ID                       | Dates and Time | Timekeeper      | Units     | Rate        | Slip Value |
|-------------------------------|----------------|-----------------|-----------|-------------|------------|
| Posting Status                |                | Activity        | DNB Time  | Rate Info   |            |
| Description                   |                | Client          | Est. Time | Bill Status |            |
|                               |                | Reference       | Variance  |             |            |
| 69663                         | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 6/30/2014                     |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                           |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch |                |                 | 0.00      |             |            |
| SONY_EN_0001.                 |                |                 |           |             |            |
| 69664                         | TIME           | R. Perez        | 7.50      | 300.00      | 2250.00    |
| 7/1/2014                      |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                           |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch |                |                 | 0.00      |             |            |
| SONY_EN_0001.                 |                |                 |           |             |            |
| 69785                         | TIME           | R. Perez        | 6.00      | 300.00      | 1800.00    |
| 7/2/2014                      |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                           |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch |                |                 | 0.00      |             |            |
| SONY_EN_0001.                 |                |                 |           |             |            |
| 69788                         | TIME           | R. Perez        | 6.00      | 300.00      | 1800.00    |
| 7/3/2014                      |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                           |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch |                |                 | 0.00      |             |            |
| SONY_EN_0001.                 |                |                 |           |             |            |
| 69789                         | TIME           | R. Perez        | 2.00      | 300.00      | 600.00     |
| 7/6/2014                      |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                           |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch |                |                 | 0.00      |             |            |
| SONY_EN_0001.                 |                |                 |           |             |            |
| 69790                         | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 7/7/2014                      |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP                           |                | Li-Ion Batterie | 0.00      |             |            |
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| 69792                         | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 7/8/2014                      |                | (7) Doc Review  | 0.00      | T@3         |            |
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| 69970                         | TIME           | R. Perez        | 6.00      | 300.00      | 1800.00    |
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| 69974                         | TIME           | R. Perez        | 7.50      | 300.00      | 2250.00    |
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| Slip ID                                     |      | Timekeeper      | Units     | Rate        | Slip Value |
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| 69978                                       | TIME | R. Perez        | 7.50      | 300.00      | 2250.00    |
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| 70210                                       | TIME | R. Perez        | 1.00      | 300.00      | 300.00     |
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| 70212                                       | TIME | R. Perez        | 8.00      | 300.00      | 2400.00    |
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| 70296                                       | TIME | R. Perez        | 7.50      | 300.00      | 2250.00    |
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| Slip ID                                     | Dates and Time | Timekeeper       | Units              | Rate        | Slip Value |
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| 70663                                       | TIME           | R. Perez         | 6.00               | 300.00      | 1800.00    |
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| 70665                                       | TIME           | R. Perez         | 5.50               | 300.00      | 1650.00    |
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| 70890                                       | TIME           | R. Perez         | 8.00               | 300.00      | 2400.00    |
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| Slip ID                                     | Dates and Time | Timekeeper      | Units     | Rate        | Slip Value |
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| 70932                                       | TIME           | R. Perez        | 4.40      | 300.00      | 1320.00    |
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| 70935                                       | TIME           | R. Perez        | 7.80      | 300.00      | 2340.00    |
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| 70937                                       | TIME           | R. Perez        | 7.00      | 300.00      | 2100.00    |
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| 70940                                       | TIME           | R. Perez        | 7.00      | 300.00      | 2100.00    |
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| 71044                                       | TIME           | R. Perez        | 7.10      | 300.00      | 2130.00    |
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| 71046                                       | TIME           | R. Perez        | 5.00      | 300.00      | 1500.00    |
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| 71050  | TIME           | R. Perez         | 3.50               | 300.00      | 1050.00    |
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| 71879  | TIME           | K. Scanlan       | 0.50               | 575.00      | 287.50     |
| 9/22/2014  |                | (11) Lit Strat   | 0.00               | T@3         |            |
| WIP  |                | Li-Ion Batterie  | 0.00               |             |            |
| Review correspondence from lead counsel regarding additional information required of class representative (.30). Communication with client Richard Johns regarding same (.20). |                |                  | 0.00               |             |            |
| 71880  | TIME           | K. Scanlan       | 0.30               | 575.00      | 172.50     |
| 9/29/2014  |                | (3) Dt Dsco A/R  | 0.00               | T           |            |
| WIP  |                | Li-Ion Batterie  | 0.00               |             |            |
| Coordinate with client Richard Johns regarding declaration on preservation (.20). Provide same to lead counsel (.10).  |                |                  | 0.00               |             |            |
| 71897  | TIME           | R. Perez         | 5.15               | 300.00      | 1545.00    |
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| 72035  | TIME           | R. Perez         | 7.50               | 300.00      | 2250.00    |
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| 72037  | TIME           | R. Perez         | 4.00               | 300.00      | 1200.00    |
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| Reviewed documents from batch SONY_EN_0016. |                |                 | 0.00      |             |            |
| 72624                                       | TIME           | R. Perez        | 7.80      | 300.00      | 2340.00    |
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| Reviewed documents from batch SONY_EN_0016. |                |                 | 0.00      |             |            |

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| 72982                                       | TIME           | R. Perez        | 7.50      | 300.00      | 2250.00    |
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| 73171                                       | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 11/11/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
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| 73634                                       | TIME           | R. Perez        | 6.00      | 300.00      | 1800.00    |
| 11/12/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0016. |                |                 | 0.00      |             |            |

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| Slip ID                                     | Dates and Time | Timekeeper      | Units     | Rate        | Slip Value |
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| Posting Status                              |                | Activity        | DNB Time  | Rate Info   |            |
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| 73635                                       | TIME           | R. Perez        | 7.50      | 300.00      | 2250.00    |
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| 73636                                       | TIME           | R. Perez        | 6.80      | 300.00      | 2040.00    |
| 11/14/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
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| 73637                                       | TIME           | R. Perez        | 2.20      | 300.00      | 660.00     |
| 11/16/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
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| 73639                                       | TIME           | R. Perez        | 7.10      | 300.00      | 2130.00    |
| 11/17/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
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| 73641                                       | TIME           | R. Perez        | 6.90      | 300.00      | 2070.00    |
| 11/18/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
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| Reviewed documents from batch SONY_EN_0016. |                |                 | 0.00      |             |            |
| 73517                                       | TIME           | R. Perez        | 2.00      | 300.00      | 600.00     |
| 11/19/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027. |                |                 | 0.00      |             |            |
| 73518                                       | TIME           | R. Perez        | 8.80      | 300.00      | 2640.00    |
| 11/20/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027. |                |                 | 0.00      |             |            |
| 73521                                       | TIME           | R. Perez        | 8.10      | 300.00      | 2430.00    |
| 11/21/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
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| 73522                                       | TIME           | R. Perez        | 4.00      | 300.00      | 1200.00    |
| 11/23/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027. |                |                 | 0.00      |             |            |
| 73523                                       | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 11/24/2014                                  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027. |                |                 | 0.00      |             |            |

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| 73535   | TIME           | R. Perez            | 7.20      | 300.00      | 2160.00    |
| 12/1/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
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| 73537   | TIME           | R. Perez            | 9.20      | 300.00      | 2760.00    |
| 12/2/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
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| 73644   | TIME           | R. Perez            | 9.30      | 300.00      | 2790.00    |
| 12/3/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
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| 73646   | TIME           | R. Perez            | 7.30      | 300.00      | 2190.00    |
| 12/4/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
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| Reviewed documents from batch SONY_EN_0027.                     |                |                     | 0.00      |             |            |
| 73648   | TIME           | R. Perez            | 5.00      | 300.00      | 1500.00    |
| 12/5/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie     | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027.                     |                |                     | 0.00      |             |            |
| 73651   | TIME           | R. Perez            | 4.00      | 300.00      | 1200.00    |
| 12/6/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie     | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027.                     |                |                     | 0.00      |             |            |
| 73653   | TIME           | R. Perez            | 9.00      | 300.00      | 2700.00    |
| 12/8/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie     | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027.                     |                |                     | 0.00      |             |            |
| 73654   | TIME           | R. Perez            | 0.80      | 300.00      | 240.00     |
| 12/9/2014   |                | (7) Doc Review      | 0.00      | T@3         |            |
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| Reviewed documents from batch SONY_EN_0027.                     |                |                     | 0.00      |             |            |
| 73894   | TIME           | R. Perez            | 7.70      | 300.00      | 2310.00    |
| 12/10/2014  |                | (7) Doc Review      | 0.00      | T@3         |            |
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| Reviewed documents from batch SONY_EN_0027.                     |                |                     | 0.00      |             |            |

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| Posting Status  |                | Activity        | DNB Time  | Rate Info   |            |
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| 73896   | TIME           | R. Perez        | 6.50      | 300.00      | 1950.00    |
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| 73897   | TIME           | R. Perez        | 8.20      | 300.00      | 2460.00    |
| 12/12/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
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| 73903   | TIME           | R. Perez        | 3.50      | 300.00      | 1050.00    |
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| Reviewed documents from batch SONY_EN_0027.                     |                |                 | 0.00      |             |            |
| 73909   | TIME           | R. Perez        | 6.90      | 300.00      | 2070.00    |
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| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027.                     |                |                 | 0.00      |             |            |
| 73911   | TIME           | R. Perez        | 8.80      | 300.00      | 2640.00    |
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| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch SONY_EN_0027.                     |                |                 | 0.00      |             |            |
| 74006   | TIME           | R. Perez        | 8.00      | 300.00      | 2400.00    |
| 12/19/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
| WIP   |                | Li-Ion Batterie | 0.00      |             |            |
| Reviewed documents from batch Toshiba-Toshiba America-TOS_0010. |                |                 | 0.00      |             |            |
| 74008   | TIME           | R. Perez        | 2.00      | 300.00      | 600.00     |
| 12/20/2014  |                | (7) Doc Review  | 0.00      | T@3         |            |
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| 74009   | TIME           | R. Perez        | 5.50      | 300.00      | 1650.00    |
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| 74016   | TIME           | R. Perez        | 4.60      | 300.00      | 1380.00    |
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| Reviewed documents from batch Toshiba-Toshiba                   |                |                 | 0.00      |             |            |

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| 74060 TIME   | R. Perez                                      | 7.10                                       | 300.00                           | 2130.00    |
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| 74062 TIME   | R. Perez                                      | 8.50                                       | 300.00                           | 2550.00    |
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| 74064 TIME   | R. Perez                                      | 6.00                                       | 300.00                           | 1800.00    |
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| 74067 TIME   | R. Perez                                      | 7.30                                       | 300.00                           | 2190.00    |
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| Reviewed documents from batch Toshiba-Toshiba              |   | 0.00                                       |                                  |            |
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| 74069 TIME   | R. Perez                                      | 6.00                                       | 300.00                           | 1800.00    |
| 1/5/2015   | (7) Doc Review                                | 0.00                                       | T@3                              |            |
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| Reviewed documents from batch Toshiba-Toshiba              |   | 0.00                                       |                                  |            |
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| 74230 TIME   | R. Perez                                      | 4.50                                       | 300.00                           | 1350.00    |
| 1/7/2015   | (7) Doc Review                                | 0.00                                       | T@3                              |            |
| WIP  | Li-Ion Batterie                               | 0.00                                       |                                  |            |
| Reviewed documents from batch Toshiba-Toshiba              |   | 0.00                                       |                                  |            |
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| 74232 TIME   | R. Perez                                      | 6.00                                       | 300.00                           | 1800.00    |
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| 74237 TIME   | R. Perez                                      | 5.50                                       | 300.00                           | 1650.00    |
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|   | Reference       | Variance   |             |        |            |
| 74238   | TIME            | R. Perez   | 1.50        | 300.00 | 450.00     |
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| 74830   | TIME            | R. Perez   | 7.20        | 300.00 | 2160.00    |
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| 74835   | TIME            | R. Perez   | 6.30        | 300.00 | 1890.00    |
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| 74836   | TIME            | R. Perez   | 7.70        | 300.00 | 2310.00    |
| 1/16/2015   | (7) Doc Review  | 0.00       | T@3         |        |            |
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| Reviewed documents from batch Toshiba-Toshiba America-TOS_0010. |                 |            |             |        |            |
| 74824   | TIME            | R. Perez   | 7.00        | 300.00 | 2100.00    |
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| Reviewed documents from batch Toshiba-Toshiba America-TOS_0010. |                 |            |             |        |            |
| 74953   | TIME            | R. Perez   | 7.90        | 300.00 | 2370.00    |
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| Reviewed documents from batch Toshiba-Toshiba America-TOS_0010. |                 |            |             |        |            |
| 74958   | TIME            | R. Perez   | 5.80        | 300.00 | 1740.00    |
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| Reviewed documents from batch Toshiba-Toshiba                   |                 |            |             |        |            |



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|---|--|--|----------------------------------|------------|
| America-TOS_0010.   |  |  |                                  |            |
| 78000 TIME<br>5/4/2015<br>WIP<br>[REDACTED]   | K. Scanlan<br>(3) Dt Dsco A/R<br>Li-Ion Batterie | 0.20<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 120.00     |
| 78021 TIME<br>5/7/2015<br>WIP<br>[REDACTED]<br>[REDACTED] e-mail with co-counsel<br>regarding same (.10).                                 | K. Scanlan<br>(3) Dt Dsco A/R<br>Li-Ion Batterie | 0.20<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 120.00     |
| 77533 TIME<br>5/10/2015<br>WIP<br>Finalize [REDACTED] interrogatory responses.  | K. Scanlan<br>(3) Dt Dsco A/R<br>Li-Ion Batterie | 0.50<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 300.00     |
| 77669 TIME<br>5/19/2015<br>WIP<br>E-mail with co-counsel regarding verifications for<br>[REDACTED]  | K. Scanlan<br>(3) Dt Dsco A/R<br>Li-Ion Batterie | 0.10<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 60.00      |
| 77672 TIME<br>5/20/2015<br>WIP<br>[REDACTED]<br>[REDACTED]  | K. Scanlan<br>(3) Dt Dsco A/R<br>Li-Ion Batterie | 0.10<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 60.00      |
| 80259 TIME<br>9/15/2015<br>WIP<br>Telephone call with class counsel regarding<br>Toshiba discovery (.10); [REDACTED]<br>[REDACTED] (.10). | K. Scanlan<br>(11) Lit Strat<br>Li-Ion Batterie  | 0.20<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 120.00     |
| 83762 TIME<br>12/29/2015<br>WIP<br>[REDACTED]<br>[REDACTED]   | K. Scanlan<br>(5) Depo Defend<br>Li-Ion Batterie | 0.50<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 300.00     |
| 83291 TIME<br>1/4/2016<br>WIP<br>E-mails regarding [REDACTED]<br>[REDACTED]   | K. Scanlan<br>(9) Read/Rev<br>Li-Ion Batterie    | 0.20<br>0.00<br>0.00<br>0.00               | 600.00<br>T                      | 120.00     |



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| Posting Status  | Activity        | Client     | DNB Time    | Rate Info |            |
| Description   | Reference       | Est. Time  | Bill Status |           |            |
|   |                 | Variance   |             |           |            |
| 83339   | TIME            | K. Scanlan | 0.20        | 600.00    | 120.00     |
| 1/7/2016  | (3) Dt Dsco A/R | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| E-mails with K. Houk regarding [REDACTED] to Interrogatory set two. |                 |            |             |           |            |
| 83215   | TIME            | K. Scanlan | 0.10        | 600.00    | 60.00      |
| 1/11/2016   | (11) Lit Strat  | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| [REDACTED] regarding upcoming deposition and preparation.           |                 |            |             |           |            |
| 83222   | TIME            | K. Scanlan | 0.10        | 600.00    | 60.00      |
| 1/12/2016   | (11) Lit Strat  | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| Telephone call with K. Houk regarding deposition of [REDACTED]      |                 |            |             |           |            |
| 83228   | TIME            | K. Scanlan | 0.20        | 600.00    | 120.00     |
| 1/13/2016   | (11) Lit Strat  | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| E-mails with K. Houk and client [REDACTED] regarding deposition.    |                 |            |             |           |            |
| 83179   | TIME            | K. Scanlan | 2.00        | 600.00    | 1200.00    |
| 1/19/2016   | (5) Depo Defend | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| Prepare for deposition of [REDACTED]                                |                 |            |             |           |            |
| 83192   | TIME            | K. Scanlan | 0.50        | 600.00    | 300.00     |
| 1/20/2016   | (11) Lit Strat  | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| E-mails with Kathryn Houk regarding preparation for [REDACTED]      |                 |            |             |           |            |
| 83193   | TIME            | K. Scanlan | 3.00        | 600.00    | 1800.00    |
| 1/20/2016   | (9) Read/Rev    | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| Prepare for deposition of [REDACTED]                                |                 |            |             |           |            |
| 83196   | TIME            | K. Scanlan | 5.00        | 600.00    | 3000.00    |
| 1/21/2016   | (9) Read/Rev    | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| Prepare for deposition of [REDACTED]                                |                 |            |             |           |            |
| 83198   | TIME            | K. Scanlan | 1.00        | 600.00    | 600.00     |
| 1/21/2016   | (5) Depo Defend | 0.00       | T           |           |            |
| WIP   | Li-Ion Batterie | 0.00       |             |           |            |
| Conference call preparation [REDACTED] and Lindsey Godfrey Eccles.  |                 |            |             |           |            |

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2:06 PMKeller Grover LLP  
Slip Listing

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| Slip ID   | Timekeeper      | Units     | Rate        | Slip Value |
|---|-----------------|-----------|-------------|------------|
| Dates and Time  | Activity        | DNB Time  | Rate Info   |            |
| Posting Status  | Client          | Est. Time | Bill Status |            |
| Description   | Reference       | Variance  |             |            |
| 83204   | K. Scanlan      | 8.00      | 600.00      | 4800.00    |
| 1/22/2016   | (5) Depo Defend | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| Attend deposition of [REDACTED]   |                 | 0.00      |             |            |
| 83205   | K. Scanlan      | 0.50      | 600.00      | 300.00     |
| 1/22/2016   | (11) Lit Strat  | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| E-mail to L. Godfrey-Eccles regarding outstanding issues from deposition.                               |                 | 0.00      |             |            |
| 84182   | K. Scanlan      | 0.40      | 600.00      | 240.00     |
| 1/25/2016   | (3) Dt Dsco A/R | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| [REDACTED]  |                 | 0.00      |             |            |
| 85166   | K. Scanlan      | 0.20      | 600.00      | 120.00     |
| 2/4/2016  | (11) Lit Strat  | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| E-mails regarding deposition transcripts.   |                 | 0.00      |             |            |
| 85189   | K. Scanlan      | 0.20      | 600.00      | 120.00     |
| 2/9/2016  | (9) Read/Rev    | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| E-mails regarding transcript and supplemental Interrogatory responses for [REDACTED]                    |                 | 0.00      |             |            |
| 84121   | K. Scanlan      | 0.20      | 600.00      | 120.00     |
| 2/18/2016   | (11) Lit Strat  | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| E-mails regarding signature of [REDACTED] for deposition transcript.                                    |                 | 0.00      |             |            |
| 85119   | K. Scanlan      | 0.40      | 600.00      | 240.00     |
| 3/14/2016   | (9) Read/Rev    | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| Review supplemental discovery responses (.30); e-mails with lead counsel regarding verifications (.10). |                 | 0.00      |             |            |
| 85284   | K. Scanlan      | 0.30      | 600.00      | 180.00     |
| 3/21/2016   | (12) Negot Sett | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| [REDACTED]  |                 | 0.00      |             |            |
| [REDACTED]  |                 |           |             |            |
| 85304   | K. Scanlan      | 0.30      | 600.00      | 180.00     |
| 3/21/2016   | (11) Lit Strat  | 0.00      | T           |            |
| WIP   | Li-Ion Batterie | 0.00      |             |            |
| E-mails to lead counsel regarding request to  |                 | 0.00      |             |            |

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2:06 PMKeller Grover LLP  
Slip Listing

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| Slip ID                                   |      | Timekeeper      | Units      | Rate        | Slip Value |
|---|------|-----------------|------------|-------------|------------|
| Dates and Time                            |      | Activity        | DNB Time   | Rate Info   |            |
| Posting Status                            |      | Client          | Est. Time  | Bill Status |            |
| Description                               |      | Reference       | Variance   |             |            |
| search for electronic documents.          |      |                 |            |             |            |
| 85330                                     | TIME | K. Scanlan      | 0.20       | 600.00      | 120.00     |
| 3/23/2016                                 |      | (9) Read/Rev    | 0.00       | T           |            |
| WIP                                       |      | Li-Ion Batterie | 0.00       |             |            |
| Review letter from lead counsel regarding |      |                 | 0.00       |             |            |
| dismissal (.10)                           |      |                 |            |             |            |
|   |      |                 |            |             |            |
| Grand Total                               |      |                 |            |             |            |
|   |      |                 | Billable   | 942.30      | 290350.00  |
|   |      |                 | Unbillable | 0.00        | 0.00       |
|   |      |                 | Total      | 942.30      | 290350.00  |

**EXHIBIT D**

In re Lithium Ion Batteries Antitrust Litigation

**KELLER GROVER LLP**

Reported Expenses Incurred on Behalf of IPPs

**EXPENSE REPORT**

| <b>CATEGORY</b>                                    | <b>AMOUNT<br/>INCURRED</b> |
|--|----------------------------|
| Attorney Service                                   |                            |
| Litigation Assessment                              |                            |
| Court Fees (Filing, etc.)                          | \$445.00                   |
| Document Production                                |                            |
| Experts/Consultants                                |                            |
| Federal Express                                    |                            |
| Transcripts (Hearing, Deposition, etc.)            | \$2090.85                  |
| Investigation                                      |                            |
| Lexis/Westlaw                                      | \$43.20                    |
| Messenger/Delivery                                 | \$44.90                    |
| Photocopies – In House (capped at \$0.20 per copy) |                            |
| Photocopies – Outside                              |                            |
| Postage  |                            |
| Service of Process                                 | \$69.00                    |
| Supplies   |                            |
| Telephone/Telecopier                               |                            |
| Travel   |                            |
| Miscellaneous                                      | \$34.00                    |
| <b>TOTAL:</b>                                      | <b>\$2,726.95</b>          |