

EXHIBIT 21

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 MARK A. GRIFFIN
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS'
FEES AND REIMBURSEMENT OF
EXPENSES ON BEHALF OF KELLER
ROHRBACK L.L.P.**

DECLARATION OF MARK A. GRIFFIN IN SUPPORT OF IPPS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KELLER ROHRBACK L.L.P.; No. 13-md-02420-YGR (DMR)

1 I, Mark A. Griffin, declare:

2 1. I am a partner of Keller Rohrback L.L.P., 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 [insert named class representative’s name, if
8 applicable] and as counsel for IPPs throughout the course of this litigation. The background and
9 experience of Keller Rohrback L.L.P. and its attorneys are summarized in the curriculum vitae
10 attached hereto as **Exhibit A**.

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

15 4. During the pendency of the litigation, Keller Rohrback L.L.P. performed the
16 following work: Investigated and filed a complaint and coordinated this filing with lead counsel,
17 responding to inquiries about discovery and expert issues.

18 5. Attached hereto as **Exhibit B** is a billing summary of Keller Rohrback L.L.P.’s
19 total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017.
20 Counsel for Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment
21 of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent
22 by Keller Rohrback L.L.P. during this period of time was 32, with a corresponding lodestar based
23 on current rates of \$25,593.50. The lodestar amount reflected in Exhibit B is for work assigned by
24 Lead Counsel, and was performed by professional staff at my law firm. This summary was
25 prepared Keller Rohrback L.L.P.

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

28
DECLARATION OF MARK A. GRIFFIN IN SUPPORT OF IPPS’ MOTION FOR AN AWARD
OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
KELLER ROHRBACK L.L.P.; Case No. 13-md-02420-YGR (DMR)

8. Attached hereto as **Exhibit E** is a summary of the expenses Keller Rohrback L.L.P. has incurred during the course of this litigation. Keller Rohrback L.L.P. expended a total of \$1,761.65 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Keller Rohrback L.L.P. on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

/s/ Mark A. Griffin

DECLARATION OF MARK A. GRIFFIN IN SUPPORT OF IPPS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
KELLER ROHRBACK L.L.P.; Case No. 13-md-02420-YGR (DMR)

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

4823-2598-7401, v. 1

EXHIBIT A



COMPLEX LITIGATION

ABOUT KELLER ROHRBACK



Devoted to Justice

"[Keller Rohrback] has performed an important public service in this action and has done so efficiently and with integrity...[Keller Rohrback] has also worked creatively and diligently to obtain a settlement from WorldCom in the context of complex and difficult legal questions..."
In re WorldCom, Inc. ERISA Litigation (Cote, J.).

Keller Rohrback's lawyers excel by being prepared and persuasive. It's a simple formula that combines our strengths: outstanding writing and courtroom skill, together with unparalleled passion and integrity. We have recovered billions of dollars for our clients, and have served as lead counsel in many prominent cases, including numerous financial crisis cases against Wall Street banks and mortgage originators. Our lawyers are widely recognized as leaders in their fields who have dedicated their careers to combating corporate fraud and misconduct. We have the talent as well as the financial resources to litigate against Fortune 500 companies – and do so every day.



Who We Are

Keller Rohrback's Complex Litigation Group has a national reputation as the go-to plaintiffs' firm for large-scale, complex individual and class action cases. We represent public and private investors, businesses, governments, and individuals in a wide range of actions, including securities fraud, fiduciary breach, antitrust, whistleblower, environmental, and product liability cases. Our approach is straightforward—we represent clients who have been harmed by conduct that is wrong, and we litigate with passion and integrity to obtain the best results possible. Every case is different, but we win for the same reason: we are persuasive. When you hire us, you hire smart, creative lawyers who are skilled in court and in negotiations.

Founded in 1919, Keller Rohrback's sixty-nine attorneys and over 100 staff members are based in six offices across the country in Seattle, Oakland, Santa Barbara, Phoenix, New York, and Ronan. Over the past century, our firm has built a distinguished reputation by providing top-notch representation. We offer exceptional service and a comprehensive understanding of federal and state law nationwide. We also are well known for our abilities to collaborate with co-counsel and to work together to achieve outstanding results—essential skills in large-scale cases in which several firms represent the plaintiffs. We pride ourselves on our reputation for working smartly with opposing counsel, and we are comfortable and experienced in coordinating high-stakes cases with simultaneous state and federal government investigations. Keller Rohrback attorneys earn the respect of our colleagues and our opponents through our deft handling of the array of complex issues and obstacles our clients face.

ABOUT KELLER ROHRBACK



What We Do

Keller Rohrback's Complex Litigation Group represents plaintiffs in large-scale cases involving corporate wrongdoing. We litigate against companies that pollute, commit fraud, fix prices, and take advantage of consumers, employees, and investors. We are passionate advocates for justice. In addition, the Complex Litigation Group regularly calls on attorneys in the firm's other practice areas for expertise in areas such as bankruptcy, constitutional law, corporate transactions, financial institutions, insurance coverage, and intellectual property. Our group's access to these in-house resources distinguishes Keller Rohrback from other plaintiffs' class action firms and contributes to the firm's success. We also have a history of working with legal counsel from other countries to vigorously pursue legal remedies on behalf of clients around the globe.

We have won verdicts in state and federal courts throughout the nation and have obtained judgments and settlements on behalf of clients in excess of seven billion dollars. Courts around the country have praised our work, and we are regularly appointed lead counsel in nationally prominent class action cases. Our work has had far-reaching impacts for our clients in a variety of settings and industries, creating a better, more accountable society.

Who We Serve

We represent individuals, institutions, and government agencies. The common denominators of our clients is a desire to see justice done—and to be represented by attorneys who practice law with integrity, honesty, and devotion to serving our clients' interests.



"Despite substantial obstacles to recovery, Keller Rohrback was willing to undertake the significant risks presented by this case...Class Counsel achieved real and substantial benefits for members of the Class. [Their] extensive prior experience in complex class action securities litigation... enabled the Class to analyze and achieve this excellent result." Getty v. Harmon (SunAmerica Securities Litigation) (Dwyer, J.).

ANTITRUST AND TRADE REGULATION



ATTORNEYS

Lynn Lincoln Sarko
Raymond Farrow
Mark Griffin
Amy N.L. Hanson
Cari Campen Laufenberg
Elizabeth A. Leland
Tana Lin
Ryan McDevitt
Karin Swope

Keller Rohrback's antitrust and trade regulation practice represents Plaintiffs in state and federal courts to ensure that consumers get the benefits of free and fair competition in the marketplace. Keller Rohrback has successfully litigated cases on behalf of both consumers and businesses who have been harmed by illegal anti-competitive conduct, such as price fixing, price discrimination, misleading and deceptive marketing practices, and the monopolization and attempted monopolization of markets.

For decades, Keller Rohrback has served as lead counsel, on MDL executive committees, and in other prominent roles in large price-fixing and price discrimination cases.

REPRESENTATIVE CASES

Nurse Wage Litigation: Fleischman v. Albany Medical Center; Cason-Merenda v. Detroit Medical Center (N.D.N.Y.); (E.D. Mich.)

Keller Rohrback was Co-Lead Counsel in these long-running antitrust actions which recovered \$105 million in underpaid wages resulting from an alleged conspiracy among hospitals to set the compensation of their nurse employees in Albany, New York, and Detroit, Michigan.

Ferko v. National Ass'n For Stock Car Auto Racing, Inc., No. 02-50 (E.D. Tex.)

Keller Rohrback was Counsel for Plaintiff, a shareholder in Texas Motor Speedway (TMS), in a lawsuit that charged NASCAR with breach of contract, unlawful monopolization, and conspiring with International Speedway Corporation (ISC) to restrain trade in violation of the antitrust laws. The settlement agreement allowed TMS to purchase North Carolina Speedway from ISC and required NASCAR to sanction a Nextel Cup Series race at TMS in the future, relief that was valued at \$100.4 million.

In re Vitamins Antitrust Litigation, MDL No. 1285 (D.D.C.)

Keller Rohrback played a significant role in litigating this MDL case, one of the largest and most successful antitrust cases in history. Chief Judge Thomas Hogan certified two classes of businesses who directly purchased bulk vitamins and were overcharged as a result of a ten-year global price-fixing and market-allocation conspiracy. Recoveries for the class through settlement and verdict totaled over \$1 billion.

In re Online DVD Rental Antitrust Litigation, MDL No. 2029 (N.D. Cal.)

Keller Rohrback represented purchasers of online DVD rental services accusing Wal-Mart and Netflix of engaging in a market allocation scheme. The class achieved settlements of over \$30 million.

"The Court has repeatedly stated that the lawyering in the case at every stage was superb, and does again." *In re Linerboard Antitrust Litigation*, MDL No. 1261, 2004 WL 1221350 *6 (E.D. Pa. June, 2 2004) (DuBois, J.).

ANTITRUST AND TRADE REGULATION



REPRESENTATIVE CASES continued

Johnson v. Arizona Hospital and Healthcare Association, No. 07-1292 (D. Ariz.)

Keller Rohrback represented agency nurses who worked at various Arizona hospitals seeking to recover the underpayment of wages resulting from a conspiracy to suppress the cost of agency nurses. The class achieved settlements of more than \$26 million.

Molecular Diagnostics v. Hoffman-La Roche, Inc., No. 04-1649 (D.D.C.)

Keller Rohrback served on the Executive Committee of this class action lawsuit on behalf of direct purchasers of thermus aquaticus DNA polymerase (Taq), an essential input to technologies used to study DNA. The lawsuit alleged that various Hoffman-La Roche entities, in concert with the Perkins Elmer Corp., fraudulently procured a patent for Taq with the intent and effect of illegally monopolizing the Taq market. The court approved a \$33 million settlement in 2008.

Daisy Mountain Fire District v. Microsoft Corp., MDL No. 1332 (D. Md.)

Keller Rohrback obtained a settlement in excess of \$4 million on behalf of a class of Arizona governmental entities that indirectly purchased operating systems and software from Microsoft for overcharges resulting from Microsoft's monopolistic practices. The settlement returned millions of dollars to local government entities at a time of severe budget crisis in the state.

Transamerican Refining Corporation v. Dravo Corp., No. 88-789 (S.D. Tex.)

Keller Rohrback served as Co-Lead Counsel in this class action filed on behalf of all cost-plus purchasers of specialty steel pipe. Fabricators and suppliers of that pipe were sued on allegations of a nationwide price fixing conspiracy. The class, comprised mainly of owners of electric generating plants and oil refineries, achieved a settlement of more than \$49 million.

In approving a settlement, Judge Alan McDonald stated, "[T]he Court is impressed by the manner in which the issues have been addressed, the action has been initiated and resolved; and that is, of course, an accolade to the attorneys on both sides of the issue. And, of course, that is the underlying basis for the Court's approval. No one has more respect for the art of settlement than the incumbent of this bench. It is the most difficult of all undertakings by trial lawyers, and settlement always recognizes their composite judgment, oftentimes of nuances which are impossible to articulate. So given the caliber of the attorneys involved on both sides of this matter, the Court is satisfied that if it is good enough for them, it should be good enough for the Court." *In re Soft Drink Bottling Antitrust Litigation* (E.D. Wash. 1990).

APPELLATE PRACTICE



ATTORNEYS

Lynn Lincoln Sarko
T. David Copley
Ben Gould
Ron Kilgard
Cari Campen Laufenberg
Jeffrey Lewis
Derek Loeser
Gretchen Obrist
Erin Riley
Matthew Preusch
Karin Swope

Appeals require specialized skills and experience, and Keller Rohrback has a seasoned appellate team that includes award-winning brief writers and outstanding oral advocates. Our appellate expertise is particularly important in large cases, including complex class actions. Keller Rohrback has the experience and talent to handle any issue that arises involving interlocutory appeals and will work to ensure that any judgment or settlement is affirmed on appeal.

REPRESENTATIVE CASES

Clarke v. Baptist Memorial Healthcare Corp., --F. App'x -- (6th Cir. 2016)

Keller Rohrback overturned the district court's denial of intervention, thus allowing our clients to challenge an earlier denial of class certification.

Baker v. Microsoft Corp., 797 F.3d 607 (9th Cir. 2015)

In this proposed class action arising from a defect in Microsoft's Xbox 360, Keller Rohrback persuaded the Ninth Circuit that the trial court had erred by striking the class allegations from the complaint.

Alcantara v. Bakery & Confectionary Union, 751 F.3d 71 (2d Cir. 2014)

Keller Rohrback successfully defended the trial court's decision and judgment that the Defendants had unlawfully reduced pension benefits.

Gates v. UnitedHealth Group Inc., 561 F. App'x 73 (2d Cir. 2014)

Keller Rohrback persuaded the Second Circuit to reverse the district court's dismissal of our client's claims for medical coverage.

Wurtz v. Rawlings Co., 761 F.3d 232 (2d Cir. 2014)

Keller Rohrback submitted an amicus brief on behalf of the New York State Trial Lawyers Association in support of the appellants. The Second Circuit cited the amicus brief and adopted much of its reasoning in reversing the trial court.

Heckman v. Williamson County, 369 S.W.3d 137 (Tex. 2012)

Keller Rohrback represented a proposed class of indigent criminal Defendants who challenged the constitutionality of a number of pretrial procedures. Keller Rohrback persuaded the Texas Supreme Court to reverse the Texas Court of Appeals and allow the Plaintiffs to proceed with their claims.

Braden v. Wal-Mart Stores, Inc., 588 F.3d 585 (8th Cir. 2009)

Keller Rohrback represented a class of Wal-Mart employees who alleged that Wal-Mart's 401(k) plan charged them excessive fees. Keller Rohrback convinced the Eighth Circuit to reverse the trial court and reinstate the employees' claims.

In re Syncor ERISA Litigation, 516 F.3d 1095 (9th Cir. 2008)

Keller Rohrback represented a group of workers who alleged that their employer had violated the law by investing their retirement savings in the employer's stock. Keller Rohrback convinced the Ninth Circuit to reverse the dismissal of the trial court and reinstate the workers' claims.

BANKRUPTCY-RELATED LITIGATION



ATTORNEYS

Laurie Ashton
Gary A. Gotto
Christopher Graver

Keller Rohrback attorneys have deep and broad experience litigating in the bankruptcy courts on behalf of debtors, creditors, and creditor committees, as well as on behalf of Plaintiffs whose claims were interrupted by bankruptcy petitions. Our experience includes representing class claimants in numerous large-scale bankruptcies. These representations have involved virtually all areas of sophisticated bankruptcy practice, including: (i) pursuing relief from an automatic to litigate claims in district court; (ii) filing and opposing orders to withdraw the reference to the bankruptcy court; (iii) certifying a claimant class in bankruptcy; (iv) asserting rights to officer, director, or fiduciary insurance policies between conflicting bankruptcy claimants; (v) evaluating and negotiating proposals for debtor financing, cash collateral orders, estate sale orders and other bankruptcy

administrative matters; (vi) defending against subordination claims, and; (vii) negotiating acceptable terms of a plan of reorganization with the debtors' committee, creditors' committees, and other constituencies.

Keller Rohrback's bankruptcy attorneys also have extensive experience in a wide variety of matters involving corporate restructuring and commercial bankruptcies. Our bankruptcy clients range from tort claimants to operating entities to institutional lenders. Examples include representation of the official committee of victims of clergy sexual abuse in the Chapter 11 reorganization of a Catholic diocese, the debtors in a reorganization of fifty commercial real properties across the nation; and a national services company in the acquisition of a competitor's assets in a bankruptcy court-approved sale in the Northern District of California.

In addition to the representative cases listed below, Keller Rohrback has achieved similar results in numerous other bankruptcy proceedings involving corporations such as Global Crossing Ltd., Mirant Corp., Delphi Corp., and Fremont General Corp.

REPRESENTATIVE CASES

In re Enron Corp., No. 01-16034 (Bankr. S.D.N.Y.)

Keller Rohrback obtained stay relief to pursue litigation in the Southern District of Texas and defended against a motion to subordinate claims. Keller Rohrback achieved a settlement for the class that included the allowance of a \$265 million claim in the Enron bankruptcy.

In re WorldCom, Inc., Nos. 02 Civ. 3288(DLC), 02 Civ. 8981(DLC) (Bankr. S.D.N.Y.)

Keller Rohrback defended against a motion to subordinate claims and successfully negotiated a simultaneous resolution of claims in the bankruptcy and district courts against third parties in the total amount of \$48 million.

In re Nortel Networks, Inc., No. 09-10138(KG) (Bankr. D. Del.)

Keller Rohrback represented class claimants in simultaneous insolvency proceedings in Canada under the Companies' Creditors Arrangement Act and bankruptcy court in the District of Delaware. Keller Rohrback obtained stay relief to pursue litigation in the Middle District of Tennessee and ultimately settled class claims in Tennessee for over \$21 million.

In re Washington Mutual, Inc., No. 08-12229(MFW) (Bankr. D. Del.)

Keller Rohrback sought stay relief to pursue litigation in the Western District of Washington and pursued claims in bankruptcy court in Delaware, resulting in a simultaneous resolution of claims in the bankruptcy and district courts for \$20 million.

CONSUMER PROTECTION CLASS ACTIONS **KR**

ATTORNEYS

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T. David Copley
Raymond Farrow
Eric Fierro
Laura Gerber
Mark Griffin
Amy N.L. Hanson
Khesraw (Kash) Karmand
David Ko
Cari Campen Laufenberg
Elizabeth A. Leland
Tana Lin
Ryan McDevitt
Michael Meredith
Lisa A. Nowlin
Gretchen Obrist
Lisa Faye Petak
Mark D. Samson
Karin B. Swope
Havila C. Unrein
Amy Williams-Derry
Michael Woerner

For decades, consumers have trusted the attorneys of Keller Rohrback to protect them from harmful and unfair trade practices. Our firm is a leader in representing consumers in class action lawsuits in diverse areas, including vehicles, children's products, food contamination, drugs, mortgage modifications, identity theft, and data breaches. Keller Rohrback currently represents a wide range of consumers, such as vehicle owners and lessees, parents, environmentalists, fishermen, employees, professors, doctors, and nurses.



Through decades of hard work, ingenuity, and creativity, Keller Rohrback has achieved meaningful results for decades. These results impact not just our clients, but future consumers too; for example, homeowners now benefit from improved loan-modification practices at one of the country's biggest banks as a result of our advocacy.

Keller Rohrback attorneys are frequently featured speakers and presenters at prestigious legal education seminars on class actions, consumer protection, and data privacy.

REPRESENTATIVE CASES

In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2672 (N.D. Cal.)

Keller Rohrback filed the first multi-Plaintiff complaint against Volkswagen on September 20, 2015, two days after the defeat device scheme came to light. Our clients are consumers nationwide who allege they have been damaged by Volkswagen's fraudulent use of an emissions "defeat device" in over 500,000 vehicles in the United States and over eleven million worldwide. Keller Rohrback Managing Partner Lynn Sarko serves on the Plaintiffs' Steering Committee for this national litigation.

In re JPMorgan Chase Mortgage Modification Litigation, MDL No. 2290 (D. Mass.)

Keller Rohrback served as Co-Lead Counsel in this MDL, representing homeowners who attempted to obtain mortgage loan modifications from JPMorgan Chase and related entities. Plaintiffs alleged breach of contract and violations of consumer protection laws when Defendants failed to timely evaluate or approve mortgage modification applications of homeowners who had completed identified prerequisites. Keller Rohrback achieved a settlement for the class valued at over \$500 million.

In re Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation, MDL No. 08-1967 (W.D. Mo.)

Keller Rohrback served on the Plaintiffs' Steering Committee in this MDL on behalf of purchasers of plastic baby bottles and "sippy" cups which contained the chemical bisphenol-A (BPA). The action was favorably settled.

CONSUMER PROTECTION CLASS ACTIONS

REPRESENTATIVE CASES continued

In re Mattel, Inc., Toy Lead Paint Products Liability Litigation, MDL No. 1897 (C.D. Cal.)

Keller Rohrback served as Chair of the Executive Committee in this nationwide MDL against Mattel and Fisher-Price on behalf of purchasers of toys recalled because they were manufactured using lead paint and/or dangerous magnets. On behalf of Plaintiffs, Keller Rohrback achieved a settlement valued at approximately \$50 million.

Brotherson v. Professional Basketball Club, L.L.C., No. 07-1787 (W.D. Wash.)

Keller Rohrback represented Seattle Sonics season ticket holders who renewed their 2007–2008 season ticket packages before the team was relocated to Oklahoma City. After Plaintiffs prevailed on summary judgment, the parties negotiated a significant settlement that returned substantial sums to the class.

In re Checking Account Overdraft Litigation, No. 09-2036 (S.D. Fla.)

Keller Rohrback serves as Co-Executive Lead Counsel with regard to Defendant, Key Bank, representing consumers who allege that KeyBank violated state law by changing the order of debit card transactions to increase overdraft fees charged to customers, resulting in unlawful profits to the bank in the tens of millions of dollars. The matter is on appeal to the Eleventh Circuit.

Telephone Consumer Protection Act Cases, (King Cnty. Super. Ct., Wash.)

Keller Rohrback prosecuted numerous class actions concerning the sending of unsolicited facsimiles in violation of the Washington Telephone Consumer Protection Act, resulting in the issuance of eleven permanent injunctions and the recovery of over \$56 million on behalf of injured Plaintiffs.

Ormond v. Anthem, Inc., No. 05-1908 (S.D. Ind.)

Anthem Insurance converted from a mutual company to a stock company on November 2, 2001. More than 700,000 former members of the mutual company sued Anthem, alleging that the cash compensation they received as a result of the demutualization was inadequate. After class certification and shortly before the start of trial, Keller Rohrback and co-counsel settled the action for \$90 million.

Corona v. Sony Pictures Entertainment, Inc., No. 14-9600 (C.D. Cal.)

Keller Rohrback serves as interim Co-Lead Counsel and Liaison Counsel in this case against Sony Pictures Entertainment, Inc. on behalf of former and current Sony employees affected by the company's highly publicized data breach. Plaintiffs alleged that Sony failed to secure and protect its computer systems, servers, and databases, resulting in the release of the named Plaintiffs and other class members' personal information. Keller Rohrback obtained a significant settlement for the class in October 2015, which was approved in April 2016.

Iacovelli v. SBTickets.com, LLC, No. 15-1459 (Maricopa Cnty. Super. Ct., Ariz.)

Keller Rohrback filed a class action in Arizona state court on behalf of individuals who paid for, but did not receive, tickets to the 2014 Super Bowl (Super Bowl XLIX) from the ticket broker SBTickets. Despite purchasing tickets and receiving numerous representations that their tickets were guaranteed, SBTickets customers were told just days before the game, and in some instances, only hours before kickoff, that their ticket orders would not be fulfilled. The case was settled on favorable terms for the class notwithstanding the Defendant's insolvency and bankruptcy proceedings.

EMPLOYEE BENEFITS



ATTORNEYS

Lynn Lincoln Sarko
 Laurie Ashton
 Gretchen Freeman Cappio
 T. David Copley
 Alison Gaffney
 Laura Gerber
 Matthew Gerend
 Gary Gotto
 Benjamin Gould
 Amy N. L. Hanson
 Khesraw (Kash) Karmand
 Dean N. Kawamoto
 Ron Kilgard
 David Ko
 Tanya Korkhov
 Cari Campen Laufenberg
 Elizabeth A. Leland
 Jeffrey Lewis
 Derek Loeser
 Ian Mensher
 Gretchen Obrist
 David Preminger
 Erin Riley
 Karin B. Swope
 Havila C. Unrein
 Amy Williams-Derry

Keller Rohrback is the preeminent firm for Employee Retirement Income Security Act of 1974 (ERISA) and other benefit class action litigation. Our firm is a pioneer of ERISA class action litigation, with over a billion dollars of pension and health benefits recovered for our clients. Keller Rohrback has played a major role in developing the law and establishing that ERISA's strict fiduciary duties apply to all investments in company-sponsored retirement plans, as well as to benefits in health and welfare plans.

Keller Rohrback is routinely appointed lead or co-lead counsel in major employee benefit class actions. Our work in this complex and rapidly developing area has been praised by our clients, our co-counsel, and federal courts. Managing a complex, large-scale employee benefit case requires knowledge of employee benefit, securities, accounting, corporate, bankruptcy, and class action law. Keller Rohrback has excelled in these cases by developing a deep understanding of ERISA and by drawing on our expertise in numerous related practice areas.

Keller Rohrback attorneys are frequently featured speakers and presenters at prestigious legal education seminars on employee benefit class actions and ERISA.

REPRESENTATIVE CASES

Whetman v. IKON Office Solutions, Inc., MDL No. 1318 (E.D. Pa.)

The wave of 401(k) company stock cases began with *Whetman v. IKON Office Solutions, Inc.* In a first-of-its-kind complaint, we alleged that company stock was an imprudent investment for IKON's 401(k) plan, that the fiduciaries of the plan failed to provide complete and accurate information concerning company stock to the participants, and that they failed to address their conflicts of interest. This case resulted in ground-breaking opinions in the ERISA 401(k) area of law on motions to dismiss, class certification, approval of securities settlements with a carve-out for ERISA claims, and approval of ERISA settlements providing a total recovery to the Plans of \$111 million. Judge Katz granted final approval of the settlement on August 9, 2002.

In re Enron Corp. ERISA Litigation, MDL No. 1446 (S.D. Tex.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of Texas. After groundbreaking motions to dismiss decisions and several years of discovery, Keller Rohrback negotiated four separate settlements with different groups of Defendants, resulting in recoveries of over \$264 million for the class. Judge Melinda Harmon approved the fifth and final settlement on February 23, 2007.



EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued

In re Lucent Technologies, ERISA Litigation, No. 01-3491 (D.N.J.)

Keller Rohrback served as Co-Lead Counsel in this class action brought on behalf of participants and beneficiaries of the Lucent defined contribution plans who invested in Lucent stock. A settlement providing injunctive relief and the payment of \$69 million to the plan was approved by Judge Joel Pisano on December 12, 2003.

In re WorldCom, Inc. ERISA Litigation, No. 02-4816 (S.D.N.Y.)

Keller Rohrback served as Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the WorldCom 401(k) Salary Savings Plan who invested in WorldCom stock. Settlements providing for injunctive relief and payments of over \$48 million to the plan were approved by Judge Denise Cote on October 26, 2004 and November 21, 2005.

"[Keller Rohrback] has performed an important public service in this action and has done so efficiently and with integrity...[Keller Rohrback] has also worked creatively and diligently to obtain a settlement from WorldCom in the context of complex and difficult legal questions... [Keller Rohrback] should be appropriately rewarded as an incentive for the further protection of employees and their pension plans not only in this litigation but in all ERISA actions." *In re WorldCom, Inc. ERISA Litigation*, No. 02-4816, 2004 WL 2338151, *10 (S.D.N.Y. Oct. 18, 2004) (Cote, J.).

In re AIG ERISA Litigation, No. 04-9387 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the AIG 401(k) retirement plans who invested in AIG stock. A settlement providing for injunctive relief and the payment of \$25 million to the plans was approved by Judge Kevin T. Duffy on October 8, 2008.

In re AIG ERISA Litigation II, No. 08-5722 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the AIG 401(k) retirement plans who invested in AIG stock. A settlement providing for injunctive relief and the payment of \$40 million to the plans was approved by Judge Laura Swain on September 18, 2015.

Alvidres v. Countrywide Financial Corp., No. 07-5810 (C.D. Cal.)

Keller Rohrback served as Lead Counsel in this class action filed on behalf of participants and beneficiaries of the Countrywide 401(k) plan who invested in Countrywide stock. A settlement providing for injunctive relief and the payment of \$55 million to the plan was approved by Judge John F. Walter on November 16, 2009.

In re CMS Energy ERISA Litigation, No. 02-72834 (E.D. Mich.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Eastern District of Michigan on behalf of participants and beneficiaries of the CMS defined contribution plans who invested in CMS stock. A settlement providing injunctive relief and a payment of \$28 million to the plan was approved by Judge George Caram Steeh on December 27, 2004.

EMPLOYEE BENEFITS



REPRESENTATIVE CASES continued

In re Dynegey, Inc. ERISA Litigation, No. 02-3076 (S.D. Tex.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of Texas on behalf of participants and beneficiaries of the Dynegey defined contribution plans who invested in Dynegey stock. A settlement providing injunctive relief and a payment of \$30.75 million to the plan was approved by Judge Sim Lake on March 5, 2004.

In re Fremont General Corporation Litigation, No. 07-2693 (C.D. Cal.)

Keller Rohrback served as Lead Counsel in this class action filed in the Central District of California on behalf of participants and beneficiaries of the Fremont 401(k) plan who invested in Fremont stock. A settlement providing injunctive relief and a payment of \$21 million to the plan was approved by Judge Jacqueline Nguyen on August 10, 2011.

In re Global Crossing, Ltd. ERISA Litigation, No. 02-7453 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the GX defined contribution plans who invested in GX stock. A settlement providing injunctive relief and a payment of \$79 million to the plan was approved by Judge Gerard Lynch on November 10, 2004.

In re HealthSouth Corp. ERISA Litigation, No. 03-1700 (N.D. Ala.)

Keller Rohrback served as Lead Counsel in this class action filed in the Northern District of Alabama on behalf of participants and beneficiaries of HealthSouth's retirement plans who invested in HealthSouth stock. A settlement providing injunctive relief and a payment of \$28.875 million to the plan was approved by Judge Bowdre on June 28, 2006.

In re Household International, Inc. ERISA Litigation, No. 02-7921 (N.D. Ill.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Northern District of Illinois on behalf of participants and beneficiaries of Household's retirement plans who invested in Household stock. A settlement providing injunctive relief and a payment of \$46.5 million to the plan was approved by Judge Samuel Der-Yeghiayan on November 22, 2004.

In re Merck & Co., Inc. "ERISA" Litigation, MDL No. 1658 (D.N.J.)

Keller Rohrback served on the Co-Lead Counsel Committee in this class action filed in the District of New Jersey on behalf of participants and beneficiaries of Merck's retirement plans who invested in Merck stock. A settlement providing injunctive relief and a payment of \$49.5 million to the plan was approved by Judge Stanley R. Chesler on November 29, 2011.

In re Merrill Lynch & Co., Inc. Securities, Derivative & ERISA Litigation, No. 07-10268 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of Merrill Lynch's defined contribution plans who invested in Merrill Lynch stock. A settlement providing injunctive relief and a payment of \$75 million to the plans was approved by Judge Jed S. Rakoff on August 21, 2009.

In re State Street Bank and Trust Co. ERISA Litigation, No. 07-8488 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this ERISA breach of fiduciary duty class action filed in the Southern District of New York brought on behalf of participants and beneficiaries in the company's retirement plans. A settlement providing a payment of \$89.75 million was approved by Judge Richard J. Holwell on February 19, 2010.



EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued

Overall v. Ascension Health, No. 13-11396 (E.D. Mich.)

Keller Rohrback served as Co-Lead Counsel in this lawsuit that alleged Defendants' claim that the Ascension pension plans are exempt from ERISA's protections because it is a "church plan" is improper because, among other things, Ascension Health is not a church, or a convention or association of churches, and the Ascension Pension Plans were not established by a church or a convention or association of churches. A settlement providing for equitable relief, plus payment of \$8 million to the plans was approved by Judge Avern Cohn on April 14, 2015. Keller Rohrback continues to litigate a number of similar cases throughout the country, challenging Defendants' claims that their pension plans are exempt from ERISA.

In re Washington Mutual, Inc. ERISA Litigation, No. 07-1874 (W.D. Wash.)

Keller Rohrback served as Co-Lead Counsel in this ERISA breach of fiduciary duty class action filed in the Western District of Washington on behalf of participants and beneficiaries in the company's retirement plans who invested in Washington Mutual stock. On January 7, 2011, Judge Marsha J. Pechman granted final approval of the \$49 million settlement in the ERISA action.

In re Williams Companies ERISA Litigation, No. 02-153 (N.D. Okla.)

Keller Rohrback served as Lead Counsel in this ERISA breach of fiduciary duty class action filed in the Northern District of Oklahoma on behalf of participants and beneficiaries in the company's retirement plans who invested in Williams stock. A settlement providing a payment \$55 million in cash, plus equitable relief, was approved by Judge Terence C. Kern on November 16, 2005.

In re Xerox Corporation ERISA Litigation, No. 02-1138 (D. Conn.)

Keller Rohrback served as Co-Lead Counsel in this ERISA breach of fiduciary duty class action in the District of Connecticut on behalf of participants and beneficiaries in the company's retirement plans who invested in Xerox stock. A settlement providing for equitable relief plus a payment of \$51 million to the plans was approved by Judge Alvin Thompson on April 14, 2009.

"The Court finds that [Keller Rohrback] is experienced and qualified counsel who is generally able to conduct the litigation as lead counsel on behalf of the putative class. Keller Rohrback has significant experience in ERISA litigation, serving as co-lead counsel in the Enron ERISA litigation, the Lucent ERISA litigation, and the Provident ERISA litigation, and experience in complex class action litigation in other areas of law" *In re Williams Cos. ERISA Litigation*, No. 02-153, 2002 U.S. Dist. LEXIS 27691, *8 (N.D. Okla. Oct. 28, 2002) (Holmes, J.).



EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued



Fish v. Greatbanc Trust Company, No. 09-1668 (N.D. Ill.)

Keller Rohrback represents participants in the Antioch ESOP in this lawsuit filed in the Northern District of Illinois. Plaintiffs allege that Defendants breached their ERISA fiduciary duties by allowing the Antioch Company to redeem the Antioch shares of non-ESOP shareholders for more than they were worth, leaving the Antioch ESOP as the sole shareholder of a company with a greatly reduced value.

Potter v. ConvergeEx, No. 13-9150 (S.D.N.Y.)

Keller Rohrback serves as Co-Counsel in this lawsuit filed in the Southern District of New York that alleges Defendants violated ERISA by “double-charging” for transition management and brokerage services. Defendants funneled trade orders to an offshore subsidiary broker located in Bermuda, which created a “spread” between the actual investment price and the reported price by adding markups/markdowns. While the reported price was confirmed with customers, the actual price was undisclosed and constituted unauthorized additional compensation.

Rader v. Bruister, No. 13-1081 (S.D. Miss.)

This case alleges breach of fiduciary duty and prohibited transactions in connection with the purchase by the Bruister Company ESOP of shares from its founder. In 2014, Keller Rohrback obtained a judgment for approximately \$6.5 million after a lengthy bench trial. Collection actions are proceeding on the existing judgment. Defendants appealed the judgment. The appeal was fully briefed and argued in 2015.

“[T]he Court expressly finds that the [Keller Rohrback] attorneys added considerable value to the prosecution of these claims through their briefing, preparation, and courtroom appearances. . . . The [Keller Rohrback] attorneys were skilled and knowledgeable in ESOP litigation” *Perez v. Bruister*, 2015 WL 5712883, at *4 (S.D. Miss. 2015) (Jordan, J.)

ENVIRONMENTAL LITIGATION



ATTORNEYS

Lynn Lincoln Sarko
Gretchen Freeman Cappio
Alison Chase
Derek Loeser
Daniel Mensher
Matthew Preusch
Amy Williams-Derry
Michael Woerner

Attorneys in Keller Rohrback's Complex Litigation Group have successfully represented individuals, class members, municipalities, and nonprofit organizations in complex and critical environmental litigation. In cases involving oil spills, mishandled hazardous waste, contaminated consumer products, and industrial pollution, Keller Rohrback works to protect human health and the environment. The firm combines its unparalleled experience in consumer protection and its deep knowledge of environmental law, making Keller Rohrback a worldwide leader in litigation to safeguard our environment and the people and animals that rely on it.

REPRESENTATIVE CASES

In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Litigation, No. 3:15-md-02672 (N.D. Cal.)

Keller Rohrback filed the first multi-plaintiff complaint against Volkswagen on September 20, 2015, two days after the defeat device scheme came to light. Our clients are consumers nationwide who allege they have been damaged by Volkswagen's fraudulent use of an emissions "defeat device" in over 500,000 vehicles in the United States and over eleven million worldwide. Keller Rohrback's Lynn Sarko serves on the Plaintiffs' Steering Committee for this national litigation.

In re Exxon Valdez, No. 89-95 (D. Alaska)

Keller Rohrback was trial counsel representing fishermen, landowners, and businesses located in Prince William Sound in their action against Exxon to recover damages caused by the Exxon Valdez oil spill. A federal jury awarded a \$5 billion judgment in favor of Keller Rohrback clients. At the time, it was the largest punitive damages verdict in U.S. history. Additional claims against the pipeline owner were settled for \$98 million. More than twenty-five years after the tragic spill, the Exxon Valdez spill is still considered one of the most devastating human-caused environmental disasters. In addition, Keller Rohrback Managing Partner Lynn Sarko was appointed to serve as the Administrator of the Exxon and Alaska Qualified Settlement Funds.

Andrews v. Plains All American Pipeline, No. 2:15-cv-04113 (C.D. Cal.)

Keller Rohrback serves as interim co-lead counsel representing fisherman, fish processors, tour companies, and others affected by the May 2015 spill from Plains All American's Line 901 pipeline in Santa Barbara County. The oil spill contaminated pristine beaches, closed critical fishing grounds, and damaged natural resources throughout the region. Keller Rohrback seeks compensation for victims of the spill for their present and future damages and to hold Plains accountable for the harm it caused to the local economy and environment.



Photo: Mark Colman

ENVIRONMENTAL LITIGATION

REPRESENTATIVE CASES continued

Meeker v. Bullseye Glass Co., No. 16CV07002, Circuit Court of the State of Oregon, County of Multnomah

Keller Rohrback has filed the first and only complaint against Bullseye Glass company for contaminating a residential neighborhood in Portland Oregon by emitting hazardous levels of arsenic, cadmium, lead, chromium, and other toxic materials from its facility. Despite using thousands of pounds a year of dangerous heavy metals, Bullseye Glass has used no pollution control technology at all for more than four decades. Using innovative air and soil monitoring, Keller Rohrback is helping this neighborhood to protect itself and hold Bullseye accountable for the harm it has caused.

Wishtoyo Foundation v. Magic Mountain, No. 2:12-cv-05600 (C.D. Cal.)

Keller Rohrback worked with a team of environmental lawyers on behalf of Los Angeles-based clients who successfully negotiated a groundbreaking settlement with Six Flags Magic Mountain to address its stormwater pollution discharged to the Santa Clara River. The settlement significantly reduced the amount of heavy metals and other pollutants entering the Santa Clara from the amusement park by requiring the facility to install state-of-the-art technology, develop and implement a comprehensive site management plan, and fully comply with the Clean Water Act. Additional monetary payments made by Six Flags as a result of the case are being used to perform critical habitat restoration and mitigation projects along the Santa Clara River.

Mapleton Groundwater Litigation (Ruff v. Ensign-Bickford Industries, Inc.), No. 2:99-cv-120B (D. Utah)

Keller Rohrback attorneys successfully litigated a series of groundwater contamination suits against multiple international Defendants accused of releasing hazardous chemicals into the watershed over six decades. The suits were brought on behalf of individuals and their families against Defendants who owned a former explosives plant in Mapleton, Utah. The Plaintiffs alleged that improper waste



Photo: Mark Colman

disposal caused contaminants to seep into the groundwater and that the chemicals caused property damage and non-Hodgkin's lymphoma cancers affecting numerous residents. The matter involved complex scientific issues related to hydrogeology, chemical migration pathways, aquifer dynamics, clean-up methods, and contaminant degradation. The litigation resolved prior to trial after lengthy evidentiary hearings at which Plaintiffs received favorable Daubert rulings.

Clean Water Act Enforcement – General Magnaplate

In partnership with the non-profit Environmental Defense Center, one of the oldest environmental organizations in the United States, Keller Rohrback L.L.P. helped reach a final settlement with General Magnaplate California to control the significant pollutants the company discharged via stormwater into the fragile Santa Clara River. Under the settlement, General Magnaplate agreed to implement enhanced storm water management measures at its electroplating facility to ensure that storm water runoff does not contain high levels of pollutants that pose a threat to human health and the environment. These measures include installing effective treatment technology and repairing paved surfaces. In addition, General Magnaplate will contribute \$15,000 to the Rose Foundation for Communities and the Environment to be used to improve the water quality in the Santa Clara River watershed.



INTERNATIONAL LAW

ATTORNEYS

Lynn Lincoln Sarko
Laurie Ashton
Alison Chase
Juli Farris
Gary A. Gotto
Ian Mensher

Keller Rohrback has experience in international forums. Keller Rohrback clients include sovereign nations, state and local governments, sovereign Native American tribes, and quasi-governmental agencies where international agreements or other tort or statutory claims are at issue.

Keller Rohrback has been honored to represent sovereigns in litigation and arbitration matters involving governmental and business entities. The firm currently has three cases pending in the International Court of Justice and is pursuing a breach of treaty claim on behalf of a sovereign nation. Keller Rohrback is also investigating environmental contamination claims on behalf of a sovereign nation.

Keller Rohrback attorneys have represented clients in international arbitration proceedings, including International Centre for Dispute Resolution and International Chamber of Commerce arbitrations, as well as ad hoc arbitrations conducted under the United Nations Commission on International Trade Law Arbitration Rules. Domestically, these international arbitrations have given rise to related litigation in U.S. courts, including confirmation and enforcement proceedings under the New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards.



In addition, Keller Rohrback attorneys have represented private clients with international interests in civil litigation in U.S. courts, including state and federal courts in California, New York, Illinois, and Texas. Keller Rohrback attorneys have litigated trademark claims on foreign-registered trademarks in several western European countries and have also succeeded in obtaining rulings to conduct depositions and other discovery in Russia for litigation matters pending in the U.S. federal courts. The firm has also represented claimants in insolvency proceedings in Canada, proceeding under the Companies' Creditors Arrangement Act.

Keller Rohrback is a member firm of several international organizations: the Global Justice Network, a consortium of international counsel working together and across borders for the benefit of victims; the International Financial Litigation Network

of attorneys, who handle cross-border litigation in the finance arena; and the Sovereign Wealth Fund Institute, a global organization of asset managers and service providers.

REPRESENTATIVE CASES

The Republic of the Marshall Islands v. United States of America et al., No. 14-1885 (N.D. Cal.)

Keller Rohrback currently represents the Republic of the Marshall Islands (RMI), a sovereign nation, in an action for breach of the Treaty on the Non-Proliferation of Nuclear Weapons, and in multiple similar cases pending at the International Court of Justice against the United Kingdom, India, and Pakistan. For this ground-breaking work, Keller Rohrback has been nominated by the International Peace Bureau for the 2016 Nobel Peace Prize as part of the international legal team representing the RMI, together with the RMI's former Foreign Minister, Tony deBrum, who initiated the litigation.

SECURITIES AND FINANCIAL FRAUD



ATTORNEYS

Lynn Lincoln Sarko
Alison Chase
Juli Farris
Eric Fierro
Matthew Gerend
Gary A. Gotto
Benjamin Gould
Mark Griffin
Dean N. Kawamoto
Ron Kilgard
David Ko
Derek W. Loeser
Ryan McDevitt
Ian Mensher
Michael W. Meredith
Gretchen Obrist
David S. Preminger
Erin Riley
Karin B. Swope
Havila C. Unrein
Amy Williams-Derry

Keller Rohrbach enjoys a national reputation for excellence in prosecuting securities and financial fraud matters. We represent a variety of investors ranging from classes of individuals to large institutions. Many of our cases reflect recent financial scandals: we are pursuing claims against a group of international banks for rigging LIBOR; we represent investors in connection with their purchases of billions of dollars of mortgage-backed securities; and we pursued claims on behalf of employee benefit plans in connection with the Madoff Ponzi scheme. While our experience is diverse, our approach is simple and straightforward: we master the factual and legal bases for our claims with a focus on providing clear and concise explanations of the financial fraud and why our clients are entitled to recover.

REPRESENTATIVE CASES & SUCCESSES

Federal Home Loan Bank Litigation

Keller Rohrbach has played a prominent role in large securities fraud and other investment cases litigated across the country involving mortgage-backed securities. Keller Rohrbach has been retained by several Federal Home Loan Banks (FHLBs) to pursue securities and common law claims against dozens of issuers, underwriters, and sponsors of mortgage-backed securities. The FHLB complaints named more than 120 defendants and involved over 200 securities with a collective original face value of \$13 billion. The relief sought by the FHLBs includes rescission and damages under state blue sky laws and the federal securities laws. We have recovered hundreds of millions of dollars on behalf of our clients to date.

In re the Bank of New York Mellon (as Trustee), No. 651786/2011 (N.Y. Sup. Ct.)

Keller Rohrbach was a member of the three-firm steering committee addressing significant mortgage repurchase issues that impacted institutional investors. Keller Rohrbach represented certificate holders who intervened in a proposed \$8.5 billion settlement initiated by Bank of New York Mellon, as Trustee of 530 Countrywide mortgage-backed securities trusts. Our firm played a lead role in discovery and the eight-week bench trial in New York contesting the fairness of the settlement. The objection we pursued and tried was the only objection that the trial court sustained.

In re LIBOR-Based Financial Instruments Antitrust Litig., No. 11-2262 (S.D.N.Y.)

Keller Rohrbach represents institutional funds pursuing antitrust claims based on the manipulation of the London Interbank Offered Rate (LIBOR) by the international panel of banks entrusted to set that rate. Multiple government investigations have revealed that certain panel banks manipulated LIBOR to mislead the markets and investors about the state of their financial health. The case is in discovery.

Diebold v. Northern Trust Investments, N.A., 09-1934 (N.D. Ill.)

Keller Rohrbach was Class Counsel in this class action litigation against Northern Trust alleging that Northern Trust imprudently structured and managed its securities lending program by improperly investing cash collateral in long term debt, residential mortgage-backed securities, SIVs, and other risky and illiquid assets. On August 7, 2015, Judge Susan E. Cox approved the allocation plan for a \$36 million settlement.

SECURITIES AND FINANCIAL FRAUD



SUCCESSSES continued

Louisiana Firefighters' Retirement System v. Northern Trust Investments, N.A., No. 09-7203 (N.D. Ill.)

Keller Rohrback is Co-Lead Counsel in this securities lending litigation, a class action brought on behalf of four public retirement systems alleging that Northern Trust breached its fiduciary and contractual duties to investors when it imprudently structured and managed its securities lending program by improperly investing cash collateral in long-term debt, residential mortgage-backed securities, SIVs, and other risky and illiquid assets, rather than conservative, liquid investments. Plaintiffs allege that Northern Trust's imprudent management of the collateral pools caused Plaintiffs and other investors to suffer hundreds of millions of dollars in losses. On May 6, 2011, the Honorable Robert W. Gettleman denied in significant part Defendants' motion to dismiss. Plaintiffs also successfully defeated Defendants' third party complaint. The Court thereafter approved a partial settlement of \$24,000,000 in cash, plus interest earned thereon, which represents settlement of the indirect lending claims of settlement class members.

In re Bank of New York Mellon Corp. Forex Transactions Litigation, No. 12-2335 (S.D.N.Y.)

Keller Rohrback served as Lead ERISA Counsel in this class action against the Bank of New York Mellon arising from its undisclosed charges for Standing Instruction Foreign Currency ("SI FX") transactions. Plaintiffs allege that from January 12, 1999 to the present, Bank of New York Mellon breached its fiduciary duties by failing to prudently and loyally manage the Plan's foreign currency transactions in the best interests of the participants, failing to disclose fully the details of the relevant SI FX transactions it was undertaking on behalf of the Plans, and engaging in prohibited transactions. In March 2015, a global resolution of the private and governmental enforcement actions was announced in which \$504 million will be paid back to BNY Mellon customers—\$335 million of which is directly attributable to funds received in the class litigation.

Madoff Direct & Feeder Fund Litigation: Hartman v. Ivy Asset Management LLC, No. 09-8278 (S.D.N.Y.)

Keller Rohrback successfully litigated this direct action on behalf of the trustees of seventeen employee benefit plans damaged by the Madoff Ponzi scheme. The action alleged that Ivy Asset Management and J.P. Jeanneret Associates, Inc. breached their fiduciary duties under ERISA by causing the plans to be invested directly or indirectly in Madoff funds. Keller Rohrback obtained a settlement of over \$219 million in this case and related actions, including claims brought by the United States Secretary of Labor and the New York Attorney General.

In re IKON Office Solutions, Inc. Securities Litigation, MDL No. 1318 (E.D. Pa.)

Keller Rohrback served as Co-Lead Counsel representing the City of Philadelphia and eight other lead Plaintiffs in this certified class action alleging securities fraud. Class counsel achieved the highest securities fraud settlement at that time in the Eastern District of Pennsylvania by settling with Defendant IKON Office Solutions, Inc. for \$111 million. The settlement was listed as one of the "largest settlements in class-action securities-fraud lawsuits since Congress reformed securities litigation in 1995" by *USA Today*.

In re Apple Computer, Inc. Derivative Litigation, No. 06-4128 (N.D. Cal.)

Keller Rohrback served on the Management Committee in this federal derivative shareholder action against nominal Defendant Apple Computer, Inc. and current and former directors and officers of Apple. Plaintiffs pursued breach of fiduciary duty, unjust enrichment, and gross mismanagement claims arising from backdated stock options granted between 1993 and 2001, which diverted millions of dollars of corporate assets to Apple executives. We achieved a settlement that awarded \$14 million—one of the largest cash recoveries in a stock backdating case—and that required Apple to adopt a series of unique and industry-leading corporate enhancements.

KELLER ROHRBACK

LAW OFFICES ♦ L.L.P.



RAYMOND FARROW

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PRACTICE EMPHASIS

- Antitrust and Trade Regulation
- Class Actions
- Consumer Protection
- Financial Products and Services

EDUCATION

University of Manchester (England)

B.A., 1979, Economics

University of Essex (England)

M.A., 1980, Economics

Princeton University

M.A., 1984, Economics

University of Washington School of Law

J.D., 2001

Raymond Farrow understands the economics behind his clients'

cases. Ray, a member of Keller Rohrback's nationally recognized Complex Litigation Group, is a litigation attorney whose practice focuses on antitrust and consumer protection. His background as an academic economist and teacher makes him uniquely qualified to work with economic experts and to communicate statistics and economic analysis to his clients and to the Court.

Working on antitrust matters, Ray must navigate the rules and issues of varied industries, including hi-tech industries involving constantly changing software and hardware. His many years of experience, strong working relationships with other antitrust litigators, and motivation to redress genuine harms to his clients help him tackle complex issues in litigation and across the negotiating table. Most recently, Ray represented 20,000 nurses in a lawsuit that alleged a conspiracy by certain hospitals in Detroit to depress compensation levels that recovered almost \$90 million for the nurses.

Prior to law school, Ray was a member of the Economics Department faculty at Seattle University, University of Washington, and Queen's University in Canada. While in law school, he served as Articles Editor of the Washington Law Review and as an intern for the U.S. Department of Labor.

In his spare time, Ray enjoys playing soccer and skiing.

BAR & COURT ADMISSIONS

2001, Washington

PROFESSIONAL & CIVIC INVOLVEMENT

King County Bar Association, *Member*

Washington State Bar Association, *Member*

Order of the Coif, *Member*

American Economic Association, *Member*

Washington State Trial Lawyers' Association, *Member*

American College of Trust and Estate Counsel, *Fellow*

PUBLICATIONS & PRESENTATIONS

Raymond J. Farrow, *Notes & Comments: Qualifying Immunity: Protecting State Employees' Right to Protect Their Employment Rights After Alden v. Maine*, 76 Wash. U. L. Rev. 149 (2001).

KELLER ROHRBACK

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MARK GRIFFIN

CONTACT INFO

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PRACTICE EMPHASIS

- Antitrust & Trade Regulation
- Class Actions
- Commercial Litigation
- Consumer Protection
- Intellectual Property
- Mass Personal Injury
- Securities

EDUCATION

Marquette University

B.S., *magna cum laude*, 1983,
Economics Faculty Award

Gonzaga University School of Law

J.D., *magna cum laude*, 1986,
Thomas More Scholar

Mark Griffin has over 25 years of experience in antitrust litigation. As a member of Keller Rohrback's nationally recognized Complex Litigation Group, Mark has litigated over 80 class action cases to successful conclusions. Mark joined Keller Rohrback in 1988 after serving as a judicial law clerk for Magistrate Judge Philip K. Sweigert of the U.S. District Court for the Western District of Washington. He helped launch the firm's antitrust practice with achievements including \$49.5 million in settlements in the *Specialty Steel Pipe Antitrust Litigation*, paving the way for the firm's success in other class action litigation. Mark has been a partner at Keller Rohrback for almost 20 years, has served on the firm's Executive Committee since 2001, and has chaired the Antitrust Practice Group since 2007. Most recently, his leadership in an antitrust class action resulted in settlements totaling almost \$90 million for registered nurses employed by hospitals in Detroit, (*Cason-Merenda v. VHS Michigan, Inc.*).

Since 2004, Mark has volunteered his time as pro bono coordinator at Keller Rohrback. He serves as a member of the Board of Trustees of the Legal Foundation of Washington (LFW) and previously as a board member and officer of the Legal Aid for Washington Fund (LAW Fund). The LFW and the LAW Fund through their Campaign for Equal Justice raise charitable contributions to ensure that justice is a reality, not just for those who can afford it, but for everyone in Washington state. In 2013, the firm received the President's Award from the LFW for its work in *Jerry Cooper, Inc. v. LifeQuotes of America, Inc.*, a case in which Mark helped achieve judgments totaling over \$760 million in favor of the plaintiff class. Mark also volunteers at Public Justice and has served as chair of the Consumer Protection, Antitrust & Unfair Business Practices Section of the Washington State Bar Association.

BAR & COURT ADMISSIONS

1986, Washington

2010, Arizona

1986, U. S. District Court for the Western District of Washington

1989, U. S. Court of Appeals for the Ninth Circuit

1990, U. S. District Court for the Eastern District of Washington

1993, U. S. Supreme Court

2008, U. S. Court of Appeals for the Fourth Circuit

2009, U. S. District Court for the Eastern District of Michigan

2009, U. S. District Court for the District of Columbia

2010, U. S. Court of Appeals for the Eleventh Circuit

2013, U.S. Court of Appeals for the Sixth Circuit

2014, U.S. Court of Appeals for the Tenth Circuit

KELLER ROHRBACK

LAW OFFICES ♦ L. L. P.

HONORS & AWARDS

AV Rating, Martindale-Hubbell, 2000-Present
President's Award, Legal Foundation of Washington, 2013
Named to Washington Super Lawyers list, 2011-2012, 2014-2016
Named a Rising Star, Super Lawyers – Washington, 2000
Thomas More Scholarship, 1983-1986
American Jurisprudence Award in Antitrust, 1986
American Jurisprudence Award in Remedies, 1986
American Jurisprudence Award in Agency and Partnerships, 1985
American Jurisprudence Award in Corporations, 1985
American Jurisprudence Award in Property, 1984
Alpha Sigma Nu (National Jesuit Honors Society) 1983
Beta Gamma Sigma (National Business Honors Society), 1982
Pi Sigma Alpha (National Political Science Honor Society), 1982
Pi Gamma Mu (International Honor Society in Social Science), 1982
Economics Faculty Award (outstanding student majoring in economics) 1983
Delta Sigma Pi Scholarship, 1979-1983

PROFESSIONAL & CIVIC INVOLVEMENT

King County Bar Association, *Member*
Washington State Bar Association, *Member*; Executive Committee and Chair-elect of the Antitrust, Consumer Protection & Unfair Business Practices Section
American Bar Association, *Member*; Litigation and Antitrust sections
Washington State Trial Lawyer's Association, *Member*
Federal Bar Association, *Member*

PUBLICATIONS & PRESENTATIONS

"The Future of Reverse Payment Settlement Agreements after *FTC v. Actavis*," 30th Annual Antitrust, Consumer Protection and Unfair Business Practices Seminar, November 8, 2013
"Intellectual Property v. Cultural Property: From Colonization to Co-Existence," Intellectual Property Institute of Canada, September 27, 2013
Contributor, "Concurrent Antitrust Criminal and Civil Proceedings: Identifying Problems and Planning for Success," American Bar Association, 2013
"Profile/Lynn Sarko: Leading the Way," Bar Bulletin, December, 2011
"Cy Pres – News on Recent Decisions which may affect cy pres in the future," LAW Fund Executive Committee Meeting, September 15, 2011
"Current Issues in Antitrust, *Twombly* Pleading Standards" (speaking for Mark Samson), State Bar of Arizona, June 20, 2008
The New Rules for Business Litigators: Keeping Ahead of the Curve, "The New Rules in Class Action Litigation," Washington State Bar Association, November 13, 2007
Executive Editor, Washington Antitrust and Consumer Protection Handbook (2007 Supplement)
"Message from the Chair," Antitrust, Consumer Protection Unfair Business Practices Newsletter, Washington State Bar Association, Fall 2005
Program Chair, "The Essentials of Civil Settlement Strategies," Washington State Bar Association, October 8, 2003
Executive Editor, Washington Antitrust and Consumer Protection Handbook (Third Edition 2001)
Program Co-Chair, 2001 Antitrust, Consumer Protection and Unfair Business Practices Conference, Washington State Bar Association, November 9, 2001
Moderator, "How to Avoid Antitrust Actions Against Your Business Clients," Washington State Bar Association, November 6, 1998
Program Committee, "1995 and Counting: A Symposium on Practices, Procedures and Professionalism," Federal Bar Association of Western Washington, December 6, 1995
Program Committee, "Trials Viewed from the Bench: See What We See," Federal Bar Association of Western Washington, December 7, 1994

KELLER ROHRBACK

L A W O F F I C E S ♦ L . L . P .

Questions of Law Column on Antitrust Law, Washington
State Bar Association, 1992

Program Co-Chair, "Trial Practice Seminar," King County
Bar Association, 1991

"Civil Service Protections for Police Officers," Washington
State Council of Police Officers, October 12, 1989

"Contractual Liability of Companies and Individuals,"
International Television Association, Seattle Chapter, Legal
Workshop, April 19, 1989

Note on Meier and Meier, 595 P.2d 474 (1979), 1986
Canadian-American Law Journal

KELLER ROHRBACK

LAW OFFICES ♦ L. L. P.



AMY N. L. HANSON

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PRACTICE EMPHASIS

- Antitrust & Trade Regulation
- Consumer & Data Privacy Protection
- Employee Benefits & Retirement Security
- Mass Personal Injury

EDUCATION

University of Minnesota

B.A., *summa cum laude*, 1995,
Economics and Political Science

University of Wisconsin Law School

J.D., 1998

Amy Hanson helps her clients work past disputes so they can refocus on personal and business goals. As a member of Keller Rohrback's nationally recognized Complex Litigation Group, Amy's practice is focused on class action and other complex litigation. Amy is a practical problem-solver who enjoys rolling up her sleeves to obtain evidence and achieve solutions. She became interested in complex litigation because she wanted to help level the playing field for hard-working people and small businesses that were similarly harmed by large businesses and groups of businesses acting together. In her more than 17 years as a litigator Amy has represented patients who experienced serious medical problems after consuming prescription drugs, small business owners who challenged alleged nationwide price fixing conspiracies, employees who challenged the prudence of allowing their employers' 401(k) plans to hold and acquire company stock and employees who challenged the reasonableness of their employers' data security practices.

Prior to joining Keller Rohrback, Amy was a Student Advocate at the University of Wisconsin Law School's Consumer Litigation Clinic and a judicial law clerk intern for Judge Deiningner at the State of Wisconsin Court of Appeals. She is currently honored to serve on the Vioxx Consumer Purchase Claims Subcommittee of the Plaintiffs' Steering Committee in *In re: Vioxx Prods. Liab. Litig.*, MDL No. 1657 (E.D.La.) and the WSAJ Consumer Protection Section Deskbook Editorial Board.

BAR & COURT ADMISSIONS

1998, Wisconsin
1998, Washington
1998, U.S. District Court for the Western District of Washington
2000, U.S. District Court for the Eastern District of Washington
2003, U.S. Court of Appeals for the Ninth Circuit
2005, U.S. District Court for the Eastern District of Michigan

PROFESSIONAL & CIVIC INVOLVEMENT

American Association for Justice, *Member*
American Bar Association, *Member*
King County Bar Association, *Member*
Washington State Association for Justice, *Member*
Washington State Bar Association, *Member*

HONORS & AWARDS

Named to Washington Super Lawyers list, 2016

PUBLICATIONS & PRESENTATIONS

Co-author, *Handbook for Washington Seniors: Legal Rights and Resources*, Legal Voice (Oct. 15, 2012).

KELLER ROHRBACK

LAW OFFICES ♦ L.L.P.



MARK D. SAMSON

CONTACT INFO

3101 North Central Avenue, Suite 1400

Phoenix, AZ 85012

(602) 248-2822

msamson@KellerRohrback.com

PRACTICE EMPHASIS

- Medical Malpractice Litigation
- Products Liability - Plaintiffs
- Personal Injury Litigation
- Commercial Litigation
- Complex Litigation

EDUCATION

Arizona State University

B.S., summa cum laude, 1976, Bio-Ag Sciences

Washington State University College of Veterinary Medicine

D.V.M., summa cum laude, 1980

Washington State University College of Veterinary Medicine

M.S., 1983, Veterinary Anatomy

Arizona State University College of Law

J.D., summa cum laude, 1986,
Order of the Coif

As a licensed veterinarian, Mark's medical knowledge helps get his clients the results they deserve.

Given his strong medical science background, Mark's practice focuses on tort law, including medical negligence, product liability, and other significant personal injury cases. He has nearly 30 years of experience litigating medical malpractice cases with victories including the landmark Edwards verdict, a transfusion-associated AIDS case which remains one of the largest personal injury verdicts in Arizona history. Mark was born in New York, but he moved to the Phoenix area in 1959 and grew up there. He practiced from 1986 to 1995 at Meyer, Hendricks, Victor, Osborn & Maledon, becoming a member in 1992. In 1995, Mark formed Dalton Gotto Samson & Kilgard, P.L.C. ("DGSK") and was one of the members of DGSK who formed Keller Rohrback P.L.C. in 2002.

BAR & COURT ADMISSIONS

1986, Arizona

1986, U.S. District Court for the District of Arizona

1986, U.S. Court of Appeals for the Ninth Circuit

1986, U.S. Supreme Court

2008, Washington, D.C.

PROFESSIONAL & CIVIC INVOLVEMENT

Maricopa County Bar Association, *Member*

Arizona State Bar Association, *Member*

American Association for Justice, *Member*

Arizona Association for Justice, *Sustaining Member*

PUBLICATIONS & PRESENTATIONS

Speaker, National Meeting of American Veterinary Medical Law Association, Tort and regulatory issues affecting veterinarians, 1995.

Chairman, Maricopa County Bar Association Seminar on Anatomy, 1994.

Chairman, Maricopa County Bar Association Seminar on Medical Malpractice in the Ages of Disclosure.

Speaker, Arizona Trial Lawyers Association Medical Malpractice Seminar, *Use of medical literature in the courtroom*, 1996; New legal theories in medical malpractice, 1999.

Co-Chair, Arizona Trial Lawyers Association, Anatomy of Pain, 2002.

Speaker, Arizona Veterinary Medical Association, *Application of legal principles to veterinary medicine*, 1999-2003.



PUBLICATIONS & PRESENTATIONS (CONT)

Speaker Arizona Paralegal Association, Settlement conferences versus trial in medical malpractice cases, 2002; Changes and issues in Arizona's ethical rules for attorneys, 2003.

Maricopa County Bar Association, *Punitive Damages after Campbell v. State Farm*, May 2003.

Chairman, Arizona State Bar, New Ethical Rules in Arizona, Oct. 2003.

Maricopa County Bar Association, Liens Again, 2004.

Maricopa County Bar Association, Arizona Appellate Update, 2005.

Co-Chairman, Arizona Trial Lawyers Association, Liens, Jan. 2006.

Blackwell's 5-Minute Veterinary Manager, Negotiation (2006).

Chairman, Arizona Trial Lawyers Association, *Rapid Fire on Litigation Issues*, Oct. 2006.

Co-Chairman, Arizona Trial Lawyers Association, Trial Practice - Damages, 2007.

Arizona Trial Lawyers Association, Issues in FTCA Claims, 2008.

Arizona Trial Lawyers Association, *Loss of a Chance in Med Mal Cases*, 2008.

KELLER ROHRBACK

L A W O F F I C E S ♦ L . L . P .

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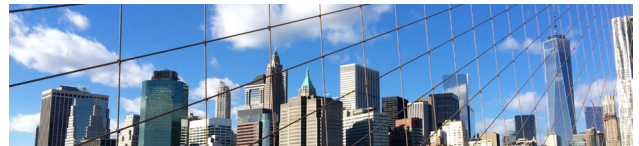
SANTA BARBARA

Keller Rohrback L.L.P.
801 Garden Street, Suite 301
Santa Barbara, CA 93101
P: 805.456.1496 | F: 805.456.1497



NEW YORK

Keller Rohrback L.L.P.
1140 Avenue of the Americas, Ninth floor
New York, NY 10036
P: 646.380.6690 | F: 646.380.6692



OAKLAND

Keller Rohrback L.L.P.
300 Lakeside Drive, Suite 1000
Oakland, CA 94612
P: 510.463.3900 | F: 510.463.3901



RONAN

Keller Rohrback L.L.P.
407 Main St. SW, Suite 3
Ronan, MT 59864
P: 406.281.7231 | F: 805.456.1497



EXHIBIT B

**IN RE: LITHIUM ION BATTERIES INDIRECT
TIME REPORT- SUMMARY**

Firm Name: Keller Rohrback

Reporting Period: June 1, 2013 - February 28, 2017

Categories:

(1) Investigations, Factual Research	(8) Drafting Pleadings, Briefs & Pretrial Motions
(2) Drafting Discovery Requests	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(3) Drafting Discovery Answers/Responses	(10) Class Certification/Experts
(4) Deposition Taking	(11) Litigation Strategy, Analysis & Case Management
(5) Deposition Defending	(12) Negotiating Settlements
(6) Discovery Meet & Confer	(13) Trial and Trial Preparation
(7) Document Review	(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	HOURLY RATE	TOTAL LODESTAR
Ray Farrow (P)	2.60		2.50			3.10		1.40	1.20						10.80	\$750.00	\$8,100.00
Ray Farrow (P)	5.10	3.40	0.40					1.40	2.10	0.20	2.10				14.70	\$895.00	\$13,156.50
Mark Griffin (P)									0.20		0.30				0.50	\$525.00	\$262.50
Amy Hanson (A)	1.20					1.10									2.30	\$850.00	\$1,955.00
Mark Samson (P)	1.80														1.80	\$940.00	\$1,692.00
															0.00	\$0.00	\$0.00
SUB-TOTAL	10.70	3.40	2.90	0.00	0.00	4.20	0.00	2.80	3.50	0.20	2.40	0.00	0.00	0.00	30.10		\$25,166.00

NON-ATTORNEYS																	
Darla Marshall (PL)	0.30							1.30							1.60	\$225.00	\$360.00
Brian Spangler (PL)											0.30				0.30	\$225.00	\$67.50
															0.00	\$0.00	\$0.00
SUB-TOTAL	0.30	0.00	0.00	0.00	0.00	0.00	0.00	1.30	0.00	0.00	0.30	0.00	0.00	0.00	1.90		\$427.50
GRAND TOTAL:	11.00	3.40	2.90	0.00	0.00	4.20	0.00	4.10	3.50	0.20	2.70	0.00	0.00	0.00	32.00		\$25,593.50

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

KELLER ROHRBACK L.L.P.

[illegible]

EXHIBIT D

(REDACTED)

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Professional: Raymond J. Farrow		
29554	Matter Description (First Line): Drafting Pleadings, Briefs & Pretrial Motions		
29554	Matter ID: 29554-8		
7/8/2013	RJF		0.20
		Matter ID: 29554-8	0.20
		Matter Description (First Line): Drafting Pleadings, Briefs &	0.20
29554	Matter Description (First Line): Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, Etc		
29554	Matter ID: 29554-9		
9/22/2016	RJF		1.20
		Matter ID: 29554-9	1.20
		Matter Description (First Line): Reading/Reviewing Pleadings,	1.20
		Professional: Raymond J. Farrow	1.40

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Professional: Mark A. Griffin		
29554	Matter Description (First Line): Drafting Discovery Answers/Responses		
29554	Matter ID: 29554-3		
11/17/2015	MAG	[REDACTED]	0.40
		Matter ID: 29554-3	0.40
		Matter Description (First Line): Drafting Discovery	0.40
29554	Matter Description (First Line): Drafting Discovery Requests		
29554	Matter ID: 29554-2		
8/16/2013	MAG	[REDACTED]	0.40
11/22/2013	MAG	[REDACTED]	0.30
12/2/2013	MAG	[REDACTED]	0.50
12/4/2013	MAG	[REDACTED]	0.20
1/22/2014	MAG	Review order on motion to dismiss (.2); [REDACTED]	0.40
7/9/2014	MAG	Review order terminating client's case (.2); [REDACTED]	0.60
		Matter ID: 29554-2	2.40
		Matter Description (First Line): Drafting Discovery Requests	2.40
29554	Matter Description (First Line): Drafting Pleadings, Briefs & Pretrial Motions		
29554	Matter ID: 29554-8		
7/5/2013	MAG	[REDACTED]	0.40

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
7/8/2013	MAG	([REDACTED]) [REDACTED]	1.00
Matter ID: 29554-8			1.40
Matter Description (First Line): Drafting Pleadings, Briefs &			1.40
29554	Matter Description (First Line): Investigations, Factual Research		
29554	Matter ID: 29554-1		
7/9/2013	MAG	[REDACTED]	0.40
7/10/2013	MAG	[REDACTED]	0.40
7/13/2013	MAG	[REDACTED]	0.40
7/19/2013	MAG	[REDACTED]	0.20
7/19/2013	MAG	[REDACTED]	0.20
7/22/2013	MAG	[REDACTED] [REDACTED]	0.50
7/25/2013	MAG	Review letter scheduling conference (.3); [REDACTED] [REDACTED]	1.00
7/26/2013	MAG	[REDACTED]	0.40
7/31/2013	MAG	[REDACTED]	0.40
8/23/2013	MAG	[REDACTED]	0.20
10/16/2015	MAG	[REDACTED]	0.20
1/22/2016	MAG	[REDACTED]	0.20
Matter ID: 29554-1			4.50
Matter Description (First Line): Investigations, Factual Research			4.50

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Matter Description (First Line): Litigation Strategy, Analysis & Case Management		
29554	Matter ID: 29554-11		
6/5/2013	MAG	[REDACTED]	0.20
6/11/2013	MAG	[REDACTED]	0.50
6/25/2013	MAG	[REDACTED]	0.20
7/2/2013	MAG	[REDACTED]	0.40
3/3/2016	MAG	[REDACTED]	0.20
7/22/2016	MAG	[REDACTED]	0.40
10/12/2016	MAG	[REDACTED]	0.20
Matter ID: 29554-11			2.10
Matter Description (First Line): Litigation Strategy, Analysis &			2.10
29554	Matter Description (First Line): Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, Etc		
29554	Matter ID: 29554-9		
7/17/2013	MAG	Review order reassigning judge	0.20
4/11/2014	MAG	[REDACTED]	0.50
4/25/2014	MAG	Review motions to dismiss	1.00
2/13/2015	MAG	[REDACTED]	0.40
Matter ID: 29554-9			2.10
Matter Description (First Line): Reading/Reviewing Pleadings,			2.10
Professional: Mark A. Griffin			12.90

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
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Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Professional: Amy Hanson		
29554	Matter Description (First Line): Litigation Strategy, Analysis & Case Management		
29554	Matter ID: 29554-11		
2/13/2015	ALH	<div></div>	0.20
		Matter ID: 29554-11	0.20
		Matter Description (First Line): Litigation Strategy, Analysis &	0.20
		Professional: Amy Hanson	0.20

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Professional: Darla Marshall		
29554	Matter Description (First Line): Drafting Pleadings, Briefs & Pretrial Motions		
29554	Matter ID: 29554-8		
7/15/2013	DM		0.30
		Matter ID: 29554-8	0.30
		Matter Description (First Line): Drafting Pleadings, Briefs &	0.30
		Professional: Darla Marshall	0.30

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Professional: Mark D. Samson		
29554	Matter Description (First Line): Discovery Meet & Confer		
29554	Matter ID: 29554-6		
8/1/2013	MDS	Review court order adding case to MDL (.2); [REDACTED]	0.60
11/19/2013	MDS	[REDACTED]	0.50
			<hr/>
Matter ID: 29554-6			1.10
Matter Description (First Line): Discovery Meet & Confer			<hr/>
			1.10
29554	Matter Description (First Line): Investigations, Factual Research		
29554	Matter ID: 29554-1		
7/18/2013	MDS	[REDACTED]	0.40
7/19/2013	MDS	[REDACTED]	0.80
			<hr/>
Matter ID: 29554-1			1.20
Matter Description (First Line): Investigations, Factual Research			<hr/>
Professional: Mark D. Samson			1.20
			<hr/>
			2.30

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	Professional: Brian E. Spangler		
29554	Matter Description (First Line): Litigation Strategy, Analysis & Case Management		
29554	Matter ID: 29554-11		
6/11/2013	BES		0.20
7/2/2013	BES		0.10
Matter ID: 29554-11			0.30
Matter Description (First Line): Litigation Strategy, Analysis &			0.30
Professional: Brian E. Spangler			0.30
Grand Total			17.40

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation

KELLER ROHRBACK L.L.P.

Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	\$930.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	\$305.20
Messenger/Delivery	
Photocopies – In House (capped at \$0.20 per copy)	\$10.25
Photocopies – Outside	
Postage	
Service of Process	\$512.35
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	\$1,761.65