

EXHIBIT 23

1 Ralph B. Kalfayan (SBN #133464)
KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP
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5 *Counsel for Indirect Purchaser Plaintiffs*
6

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **OAKLAND DIVISION**
10

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

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

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14
15 **This Document Relates to:**
16 **ALL INDIRECT PURCHASER ACTIONS**
17

DECLARATION OF RALPH B. KALFAYAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP

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1 I, Ralph B. Kalfayan, declare:

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

7 2. My firm has served as counsel to Steven Bugge (“Bugge”) and as counsel for IPPs
8 throughout the course of this litigation. The background and experience of KKBS and its attorneys
9 are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

14 4. During the pendency of the litigation, KKBS performed the following work: KKBS
15 marshaled declarations and extensive discovery from its client, class representative Steven Bugge,
16 prepared for and defended Bugge’s deposition, analyzed settlements, and diligently and
17 thoroughly communicated with its client.

18 5. Attached hereto as **Exhibit B** is a billing summary of KKBS’ total hours and
19 lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for
20 Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead
21 counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by
22 KKBS during this period of time was 125.50 hours, with a corresponding lodestar based on
23 current rates of \$61,600. The lodestar amount reflected in Exhibit B is for work assigned by Lead
24 Counsel, and was performed by professional staff at my law firm. This summary was prepared
25 from contemporaneous, daily time records regularly prepared and maintained by KKBS.

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.

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DECLARATION OF RALPH B. KALFAYAN IN SUPPORT OF IPPS’ MOTION FOR AN
AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF
OF KKBS; Case No. 13-md-02420-YGR (DMR)

EXHIBIT A

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP

www.kkbs-law.com

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP (“Krause Kalfayan”) is a leading San Diego-based class-action law firm. Krause Kalfayan, Benink & Slavens, LLP (formerly Krause & Kalfayan) represents individuals, businesses, and institutional investors in complex civil litigation in the areas of securities, antitrust, consumer fraud, partnership and business law. Although the firm handles both individual and class action litigation, it has a substantial reputation as a class action firm and has been at the forefront of multi-million dollar cases against some of the most powerful companies in the world. Krause Kalfayan has obtained numerous significant settlements and judgments for individuals and businesses in California and the United States. In recent years, the firm has expanded its practice to consumer and unfair competition cases, and has obtained substantial results benefitting consumers.

RALPH B. KALFAYAN

Ralph B. Kalfayan received a Bachelor of Science degree in Accounting from the University of San Diego in 1982. He was a member of the honors fraternity Beta Alpha Psi on campus and graduated with honors in his major. He received his Juris Doctor degree in 1985, and his Master of Laws degree with an emphasis in intellectual property in 2012 from University of San Diego School of Law.

Upon graduation, Mr. Kalfayan was employed for three years with the international firm of Arthur Andersen & Co. Mr. Kalfayan worked in the tax department, where he provided tax consulting and tax compliance work and in the audit department, where he reviewed financial statements and helped issue audit opinions.

In 1988, Mr. Kalfayan joined the law firm of Borton, Petrini & Conron, where he became a partner in 1991. Mr. Kalfayan specialized in business litigation and transactional matters including real estate transactions, general commercial transactions, corporate work, partnership work, tax litigation or consulting work, contract disputes, and large acquisition work. Mr. Kalfayan also handled a number of civil trials before a jury and several major appeals.

In August 1993, Mr. Kalfayan became Of Counsel at the Law Offices of James C. Krause, and in January 1994, he became a member of Krause & Kalfayan.

Among the articles Mr. Kalfayan has authored are: Ensuring Access to Affordable Medication: The Supreme Court's Opinion in F.T.C. v. Actavis, Inc. (Summer 2013) in Competition: The Journal of the Antitrust and Unfair Competition Law Section of the State Bar of California Vol. 22, No. 2; Buying a Business (April 15, 1993) in Business and Industry News Vol. 3, No. 2; Building a Business: Tools for the Entrepreneur (August 1, 1993) In Business & Industry News Vol. 3, Number 9; Reducing your Property Taxes in the San Diego Business and tax forecast magazine, December 1991. Seminars conducted by Mr. Kalfayan include: California Sales & Use Tax, Lorman Education Services, December 5, 1991; Business and Finance Conference at Jack Murphy Stadium, December 5, 1990; Estate Planning with Prudential Bache, Spring of 1990.

Mr. Kalfayan has proven himself as a successful litigator. He was on the Executive Committee in the matter of *In re Dynamic Random Access Memory (DRAM)*, Master File No. M-02-1486-PJH, MDL No. 1486, United States District Court Northern District of California, Oakland Division, which was an indirect purchaser case under the antitrust laws, and settled for over \$300 million; *In re Korean Airlines Co. Ltd Antitrust Litigation*, Master File No. CV 07-05107, MDL No. 1891, United States District Court Central District of California, Western Division, which was a direct purchaser case under the antitrust laws, and settled for over \$85

million; *In re Wholesale Electricity Cases I and II*, JCCP 4204, San Diego County Superior Court, which was an indirect purchaser case under the antitrust laws, and settled in amount in excess of \$200 million; *In re Natural Gas Anti-Trust Cases I, II, III, IV & V*, San Diego Superior Court, JCCP Nos. 4221, 4224, 4226, 4228, and which resulted in settlements of \$159 million for plaintiffs. In addition, Mr. Kalfayan successfully obtained a jury verdict in *Emma R. Carbonell, MD, et al. v. Kern Medical Services, Inc., et al.*, in the amount of \$1,504,594.30. He achieved a settlement in the amount of \$1 million in the case of *Gordon Giles v. Weiss Family Trust, et al.*, and achieved a settlement in the amount of \$625,000 in *Sylvia Ortega v. La Estrella Night Club, et al.*, He also reached a settlement in the amount of \$4.5 million in *Doe v. Roes*, Finally, he also achieved a settlement of \$500,000 in *Stewart v GOGO, Inc. Antitrust Litigation*, US District Court Northern District of California, Case No. 3:12-cv-5164-EMC.

Mr. Kalfayan currently works on numerous class actions, including: *In re Antelope Valley Groundwater Litigation*, JCCP 4408, Los Angeles County Superior Court Case Number BC 391869, representing over 70,000 non-pumping landowners in the largest groundwater adjudication in the State of California where the water rights were valued at over one billion dollars; *In Re Cipro I and II*, JCCP 4154 and 4220, in San Diego County Superior Court, where the case was successfully argued before the California Supreme Court, resulting in a published opinion which set the standard for pay-for-delay cases under the Cartwright Act for the State of California, and resulted in a partial settlement with one defendant in the amount of \$74,000,000; *In re Allergan*, Civil Case Number 15-307, United States District Court, Central District of California Southern Division; *In re Lithium Batteries*, Case No. C12-6492 EMC, United States District Court Northern District of California; *In re Processed Egg Indirect Purchaser Antitrust Litigation*, United States District Court Eastern District of Pennsylvania, MDL 2002; and, *Dang v*

National Football League Indirect Purchaser Antitrust litigation, United States District Court Northern District of California, Case No. 5:12-cv-5481-EJD.

ERIC J. BENINK

Mr. Benink was admitted to the California Bar in 1997. He received a Bachelor of Business Administration degree from the University of Massachusetts - Amherst in 1992 and a Juris Doctor and Master of Business Administration degree from the University of San Diego in 1996.

In 1997, Mr. Benink began working in the Enforcement Division of the Department of Corporations, an entity that serves as California's securities, commodities, franchise; and finance and mortgage lender regulator. He investigated dozens of illegal stock offerings, private placement frauds, illicit brokerage practices, and ponzi schemes, and brought civil and administrative actions against the perpetrators. He also worked closely with criminal agencies in their prosecution of alleged violators of laws under the jurisdiction of the Department.

In 2002, Mr. Benink joined Krause & Kalfayan as an Associate, and represents consumers, businesses and shareholders in securities, consumer fraud, and business litigation actions in state and federal court. He has prosecuted consumer and business litigation cases against Wells Fargo Bank, Sprint, Ticketmaster, Fleet Bank, and Apple. Mr. Benink represents hedge funds in securities actions, as well as investors in FINRA arbitrations. In 2005, Mr. Benink became a partner in the firm, which was renamed Krause, Kalfayan, Benink & Slavens, LLP.

Mr. Benink is the author of *The Model State Commodities Code, A Regulator's Perspective*, published in the Law Enforcement Reporter, Winter 1999. He has testified as a securities expert witness for the San Diego District Attorney's Office and has been appointed by the San Diego Superior Court as a receiver in three securities fraud cases. Mr. Benink is a member of the San Diego County Bar Association, the Consumer Attorneys of San Diego, a graduate of LEAD San

Diego, and former President of the Old Mission Rotary Club (2009 - 2010). He is a member of the Board of Directors for the George G. Glenner Alzheimer's Centers, Inc. He is also a contributor to the *Trial Bar News*, a publication of the Consumer Attorneys of San Diego.

Mr. Benink acted as Lead Counsel in *Shames v. City of San Diego*, (San Diego Superior Court, Case No. GIC 831539), a class action that recovered \$40 million for residential sewer customers. He has prosecuted numerous class actions cases, including: *Soto v. STI Prepaid, LLC* (San Diego Superior Court, Case No. GIC868083) (violation of prepaid calling card statute); *Neborsky v. Redem Technologies, Inc.* (San Diego Superior Court, Case No. GIC804280) (securities fraud); *Milne v. Ticket Innovations, Inc.* (breach of fiduciary duty to shareholders) (Los Angeles Superior Court, BC 311258); *Ruffalo v. En Pointe Technologies, Inc.* (United States District Court for Southern District of California, 3:01-cv-00205 BEN-AJB) (federal securities fraud); and, *Rivera v. Sprint International Communications Corp.* (San Diego Superior Court, GIC799868) (international phone overcharges). He also represents rate payors in cases involving illegal utility fees in violation of Proposition 218.

VINCENT D. SLAVENS

Mr. Slavens was admitted to the California Bar in 2001. He received his Bachelor of Arts degree in Corporate Finance from San Diego State University in 1994, and graduated with honors (*magna cum laude*) from California Western School of Law in 2001.

Prior to law school, he worked as a licensed investment broker for a number of years. During law school, Mr. Slavens successfully became a member of the California Western School of Law, Law Review. After becoming a member of the California Bar in 2001, he joined Krause & Kalfayan as an Associate Attorney, and has put his securities experience to use in securities litigation, including arbitration matters with the National Association of Securities Dealers

(NASD), now known as FINRA. He has also been involved in class action cases in securities, antitrust, and consumer law. In 2005, he became a partner in the firm, which was renamed Krause, Kalfayan, Benink & Slavens, LLP.

Mr. Slavens has been active in the legal community by volunteering with the San Diego Volunteer Lawyer Program, where he participated as a panelist on issues relating to the brokerage industry and corporate scandals; furthermore, he has provided substantial *pro bono* services to a local non-profit organization. He has also written an article on whistle-blower standing under the RICO statutes, as well as an article titled "They Heard It Through The Grapevine," which was accepted for publication in Trial Bar News.

Mr. Slavens has acted as Lead Associate in class actions such as Glea F. Bobbs v. Southern Pacific Equities, LLC, (alleging securities law violations - with settlements over \$7.75 million). He also handled an arbitration on behalf of nearly 20 investors in Larner, et al v. Wedbush Morgan Securities, et al (alleging misrepresentations and violation of securities laws).

Mr. Slavens has also handled more than thirteen arbitrations and has obtained more than \$3,000,000 in settlements or awards. He has represented investors in the following securities cases:

- *Rogers v. Fisher Investment Advisors, Inc., (Arb. No. 73 169 00187 03 JMLE) Arbitration before the American Arbitration Association.* The firm represented an investor who had hired an investment advisor to manage his money prudently. The firm claimed that Fisher Investments breached its contract and was negligent when it invested nearly all of Rogers' assets in the stock market contrary to his stated objectives, resulting in a significant loss. The firm successfully obtained an award at arbitration in favor of client in amount of \$142,210.85.

- *Johnson v. Clements Company Investment Advisors, Inc., (Arb. No. 01-04915) Arbitration before the National Association of Securities Dealers.* The firm represented investors against a brokerage firm, and claimed that the broker recommended investments which were not suitable in view of the clients stated objectives and risk tolerance. The case has settled.
- *Johnsons v. Standex Int'l Corp., dba The Berean Christian Stores, (GIC 797402) Superior Court, San Diego, California.* The firm represented investors against a bookstore, and claimed that it held an investment broker out as its employee or agent and that the book store was vicariously liable under a theory of ostensible agency. The case has settled.
- *Persico v. Sands Bros., Inc., (Arb. No. 01-04617) Arbitration before the National Association of Securities Dealers.* The firm represented an investors against a brokerage firm and claimed that the broker traded stocks in his account without authorization. The case has settled.
- *Mendelsohn v. Seaboard Securities, Inc., et. al. (Arb. No. 02-01976) Arbitration before the National Association of Securities Dealers.* The firm represented an investor against a brokerage firm and claimed that the broker recommended an investment in a “short position” which was highly speculative and not suitable in view of the clients stated objectives and risk tolerance. The case settled.
- *Carolyn Hamburger, et al v. Morgan Stanley DW, et al, (Arb. No. 02-01976) Arbitration before the National Association of Securities Dealers.*

The firm represented investors against a brokerage firm and claimed that the broker recommended an investment program that was speculative and not suitable in view of the clients stated objectives and risk tolerance, and that the broker excessively traded the accounts (*i.e.* “churning”). The case settled.

- *Gladys F. Prince v. McCarn’s Allstate Finance, Inc.*, (GIC 805084) Superior Court, San Diego, California. The firm represented investors against an investment advisor and claimed that the broker violated California law by offering and selling unregistered securities to Ms. Prince. The case settled.

PHILLIP E. STEPHAN

Phillip E. Stephan earned his J.D./M.B.A. from the University of San Diego in 2011, and his B.A. in Global Business, with a minor in Advertising, from the University of Southern California in 2007. He is admitted to practice in California.

Upon graduation from law school, Mr. Stephan worked with Perkins Coie LLP in strategic management, creating comprehensive plans to generate growth and business development. He went on to work with The Mogin Law Firm, P.C., as part of a team of antitrust experts working on complex litigation, including multi-district litigation and suits in both state and federal court. Mr. Stephan worked directly with economic experts, led litigation task teams, and was directly responsible for managing a discovery system to facilitate the firm’s work. Mr. Stephan has also worked with Scott + Scott, Attorneys at Law, LLP, in litigation support for antitrust and securities litigation. Finally, Mr. Stephan has worked and continues to work with entrepreneurs, specializing

in corporate transactions and start-up law, including capital acquisition, strategic management, intellectual property, and contract drafting and management.

On December 7, 2015, Mr. Stephan joined Krause, Kalfayan, Benink & Slavens as an Associate Attorney. Mr. Stephan's practice focuses on antitrust actions and complex business litigation. Some of his cases involve antitrust violations by corporate defendants, including "reverse payment" or "pay to delay" settlement agreements between brand name pharmaceutical drug manufacturers and generic drug manufacturers. Mr. Stephan is able to utilize his experience litigating complex antitrust cases and working with businesses to better serve his clients.

Mr. Stephan is active in the legal community. Since 2014, Mr. Stephan has served on the Advisory Board of the Business + Corporate Section of the San Diego County Bar Association, and is serving as the Vice Chair of the Section for 2017-2018, helping to design continuing legal education, plan events, and serve as a liaison between section members and the SDCBA. Mr. Stephan has also been a member of the William L. Todd Jr. American Inn of Court since 2014. Mr. Stephan practices *pro bono* on behalf of Yorkie Rescue of America.

SARAH B. ABSHEAR

Sarah B. Abshear received her juris doctorate from Columbia Law School in 2009, where she was a Harlan Fiske Stone Scholar, an academic honor awarded in recognition of superior performance. In 2006, Ms. Abshear graduated *summa cum laude* from the University of Kentucky with a Bachelor of Arts degree in Political Science and a minor in History. Ms. Abshear was admitted to the state bars of California and New York in 2010. Ms. Abshear is also admitted to practice before the United States Court of Appeals for the Ninth Circuit; the United States District Courts for the Southern, Central, and Northern Districts of California; and the United States District Courts for the Southern and Eastern Districts of New York.

From 2009-2012, Ms. Abshear worked as an attorney for Dewey & LeBoeuf, LLP, after clerking for the firm as a summer associate in 2008. For the first two years of her tenure at Dewey, Ms. Abshear participated in the firm's fellowship program, acting as a staff attorney for the American Civil Liberties Union of San Diego & Imperial Counties. At the ACLU, Ms. Abshear's practice consisted of civil rights litigation and advocacy, with a focus on the First Amendment.

Ms. Abshear returned to the New York office of Dewey & LeBoeuf in 2011 as a litigation associate. In 2012, she was one of approximately 60 litigators to leave Dewey and join the litigation department of the New York office of Winston & Strawn, LLP. Ms. Abshear's work at Dewey & LeBoeuf and Winston & Strawn focused on complex commercial litigation and antitrust cases, including class actions, sports litigation, insurance and reinsurance contract disputes between sophisticated parties, and internal and government investigations.

Ms. Abshear joined the Mogin Law Firm in 2014, where her practice focused on complex business litigation and class actions, including antitrust, unfair competition, and consumer protection cases. She subsequently went to work for Buchanan, Ingersoll, & Rooney, LLP, where her practice focused on general civil litigation, including business disputes, contract law, water rights, trade secrets, and employment law.

Ms. Abshear joined Krause, Kalfayan, Benink & Slavens as an associate attorney in February 2017. Her practice focuses on complex commercial litigation, class actions, and antitrust. Ms. Abshear has experience with a broad range of litigation across multiple industries, in both federal and state courts. She has handled all stages of case development, from initial claim assessment to post-trial motions and appeals. Ms. Abshear's clients have included Fortune 500 companies, small businesses, classes of plaintiffs, individual plaintiffs and defendants, and government entities. Representative cases include:

- *Kleen Products, LLC v. International Paper, Inc.* (N.D. Ill.) – Represented Plaintiff Class of direct purchasers in suit brought against price-fixing cartel of containerboard producers.
- *Roos v. Honeywell, International, Inc.* (Cal.) – Represented Respondent Class Plaintiffs in appeal of class action settlement by Appellant Objectors.
- Defended corporation and subsidiaries in multidistrict and related putative class actions involving alleged violations of antitrust and consumer protection statutes. Also represented corporation and subsidiaries in relation to investigation and settlement with the United States Department of Justice.
- *7 West 57th Street Realty Company, LLC v. CitiGroup, Inc.* (S.D.N.Y.) – Represented Plaintiff 7 West 57th Street Realty Company in suit brought against Defendant banks for manipulation of U.S. Dollar LIBOR.
- *Saubers v. Kashi Company* (S.D. Cal.) – Represented Plaintiff Class of purchasers in suit brought against Defendant Kashi for misleading consumers with deceptive labelling.
- *Glick v. Bankers Life & Casualty Insurance Company* – Defended insurance company in putative class action regarding allegedly delayed/denied premium payments and “modal premium” claims, the latter of which were summarily rejected on a motion to dismiss.
- *Aqua Clear Water Treatment v. Senior Operations* (Cal.) – Represented aerospace company in breach of contract case brought by its water treatment servicer for nonpayment of contract, including filing cross-complaint regarding breach of contract and fraud to ultimately resolve case with joint dismissal of claims.
- *Stemage Skin Care, LLC v. NuGene International, Inc. et al.* (C.D. Cal.) – Represented skin care company in case alleging competing company interfered with contract of brand ambassador and infringed copyright.
- *NDO America, Inc. v. Ozburn-Hessey Logistics, LLC, et al.* (Cal.) – Represented company in suit alleging theft of trade secrets and solicitation of personnel in violation of non-compete clause.
- *City of Carlsbad and Carlsbad Municipal Water District v. California State Water and Resources Control Board* (Cal.) – Represented City of Carlsbad in action to establish its water rights and SWRCB’s lack of authority to regulate water at issue.

Ms. Abshear is involved in the local community. She is a member of the San Diego Leadership Alliance (SDLA) and a SDLA 2016 Leadership Institute Fellow, where she participated in training in civic engagement, public speaking, fundraising, communications, public policy, campaigns, and organizing. She is a member of the Lawyers Club of San Diego, where she participates on the Annual Dinner Committee, helps plan events, and writes articles for the

monthly newsletter. She is also a member of the San Diego County Bar Association and Federal Bar Association.

EXHIBIT B

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

Firm Name: Krause, Kalfayan, Benink & Slavens, LLP

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

Categories:

- (1) Investigations, Factual Research
- (2) Drafting Discovery Requests
- (3) Drafting Discovery Answers/Responses
- (4) Deposition Taking
- (5) Deposition Defending
- (6) Discovery Meet & Confer
- (7) Document Review

- (8) Drafting Pleadings, Briefs & Pretrial Motions
- (9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
- (10) Class Certification/Experts
- (11) Litigation Strategy, Analysis & Case Management
- (12) Negotiating Settlements
- (13) Trial and Trial Preparation
- (14) Court Appearance and Prep

- (P) Partner
- (A) Associate
- (LC) Law Clerk
- (PL) Paralegal
- (L) Librarian

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Ralph B. Kalfayan (P)			12.00		31.40						15.30				58.70	\$625.00	\$36,687.50
Lynne Brennan (A)	0.20										0.50				0.70	\$500.00	\$350.00
Phillip Stephan (A)			3.10		43.90	3.30					13.80				64.10	\$375.00	\$24,037.50
Amanda Friedman (A)											1.00				1.00	\$300.00	\$300.00
SUB-TOTAL	0.20	0.00	15.10	0.00	75.30	3.30	0.00	0.00	0.00	0.00	30.60	0.00	0.00	0.00	124.50		\$61,375.00
NON-ATTORNEYS																	
Ian Krupar (LC)															0.00	\$0.00	\$0.00
Ian Krupar (LC)											1.00				1.00	\$225.00	\$225.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00	1.00		\$225.00
GRAND TOTAL:	0.20	0.00	15.10	0.00	75.30	3.30	0.00	0.00	0.00	0.00	31.60	0.00	0.00	0.00	125.50		\$61,600.00

EXHIBIT C

EXHIBIT D

(REDACTED)

550 West C Street, Suite 530
San Diego, California, 92101

Invoice submitted to:
Lithium-Ion Antitrust
Cotchett, Pitre & McCarthy, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010

May 23, 2017

In Reference To: Lithium-Ion Antitrust

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
6/28/2013 RBK	Litigation Strategy (11) [REDACTED], and suggestions/edit.	0.30 500.00/hr	150.00
3/3/2014 AF	Case Management (11) [REDACTED]	0.20 300.00/hr	60.00
3/17/2014 RBK	Case Management (11) Analysis of motion to dismiss issues (1). Analysis and suggested revisions of [REDACTED] (.5).	1.50 500.00/hr	750.00
4/21/2014 AF	Case Management (11) Draft e-mail to Eric Fastiff re: motion to dismiss.	0.20 300.00/hr	60.00
7/14/2014 AF	Case Management (11) [REDACTED]	0.60 300.00/hr	180.00
10/1/2014 LB	Case Management (11) [REDACTED]	0.20 500.00/hr	100.00
10/3/2014 LB	Case Management (1) Analysis of [REDACTED] documents regarding his purchases of products w/ lithium ion batteries	0.20 500.00/hr	100.00

Lithium-Ion Antitrust

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2014	LB General (11) Update [REDACTED] (.2); respond to follow up question from lead counsel (.1).	0.30 500.00/hr	150.00
1/8/2015	RBK Case Management (11) Correspondence [REDACTED] and with lead counsel.	0.50 500.00/hr	250.00
2/18/2015	RBK Case Management (11) Correspondence with [REDACTED]	0.50 500.00/hr	250.00
5/1/2015	RBK Discovery (3) Conferences with [REDACTED] (.5); draft of responses to discovery (.5).	1.00 500.00/hr	500.00
5/4/2015	RBK Case Management (11) [REDACTED] (.7), and teleconferences with lead counsel re: discovery responses (.3).	1.00 500.00/hr	500.00
5/5/2015	RBK Discovery (3) Correspondence w/lead counsel re: discovery and client availability.	0.20 500.00/hr	100.00
5/6/2015	RBK Discovery (3) Preparation of and edits to discovery responses for [REDACTED] (2); [REDACTED] and lead counsel (1).	3.00 500.00/hr	1,500.00
5/7/2015	RBK Discovery (3) Further preparation and edits to discovery responses for [REDACTED] (2.8); [REDACTED] (.3); Correspondence with lead counsel (.2).	3.30 500.00/hr	1,650.00
5/8/2015	RBK Discovery (3) Further edits to discover responses for [REDACTED] (1.7); [REDACTED] (.2); Correspondence with lead counsel (.1).	2.00 500.00/hr	1,000.00
12/2/2015	RBK Deposition (5) Teleconference w/Sklaver re: deposition of [REDACTED] (.5) and teleconference with IK re: deposition preparation (.5).	1.00 500.00/hr	500.00

Lithium-Ion Antitrust

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2015	IK Case Management (11) Call with Co-Counsel with RBK to discuss next steps of case and what should be done coming up.	1.00 200.00/hr	200.00
1/4/2016	PS Discovery (5) Analysis of deposition of [REDACTED] (2.3). Meeting w/RBK re: deposition preparation (.5). Correspondence and teleconference with Bugge (.5).	3.80 350.00/hr	1,330.00
1/7/2016	PS Discovery (3) Correspondence with [REDACTED] and lead counsel re: discovery.	0.30 350.00/hr	105.00
1/15/2016	PS Deposition (5) Preparation for deposition via case analysis and outlining (1). Correspondence with client and co-counsel re: deposition preparation (.5)	1.50 350.00/hr	525.00
1/27/2016	PS Deposition (3) [REDACTED] (.2); correspondence with co-counsel regarding same (.1)	0.30 350.00/hr	105.00
	RBK Discovery (3) Deposition prep with PS re: discovery responses and outlines.	2.50 600.00/hr	1,500.00
2/8/2016	PS Case Management (11) Correspondence with co-counsel and client (.3). Meeting with RBK re: deposition prep and schedule (.2).	0.50 350.00/hr	175.00
2/25/2016	RBK Deposition (5) Analysis of [REDACTED] documents, discovery responses, complaints, and other case documents in preparation for deposition (3.5). [REDACTED] (.5). Correspondence with co-counsel (.4).	5.40 600.00/hr	3,240.00
	PS Case Management (11) Case management of materials (discovery responses, complaints, orders, etc) in preparation for deposition.	0.70 350.00/hr	245.00
	PS Deposition (5) [REDACTED] (.1); Correspondence with co-counsel regarding deposition of client (.1); Meeting with RBK re: deposition prep (.3).	0.50 350.00/hr	175.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2016	PS Deposition (5) Analysis of 3rd and 4th CACs for use in deposition prep (3); Analysis of [REDACTED] discovery responses in depo prep (2); [REDACTED] (.5).	5.50 350.00/hr	1,925.00
2/29/2016	PS Deposition (5) Analysis of prior deposition transcripts (3.5); analysis of [REDACTED] discovery responses versus depositions (.2).	3.70 350.00/hr	1,295.00
3/1/2016	PS Deposition (5) Analysis of prior IPP depositions (3); analysis of 4th CAC versus 3rd CAC (1); Analysis of orders Construction of deposition prep outline (1). Initial client meeting and preparation (3.2).	8.20 350.00/hr	2,870.00
	RBK Deposition (5) Preparation of client for deposition.	8.00 600.00/hr	4,800.00
3/2/2016	PS Deposition (5) Preparation of materials for [REDACTED] and co-counsel review (3). Deposition preparation of [REDACTED] including [REDACTED] (6.7).	9.70 350.00/hr	3,395.00
	RBK Deposition (5) [REDACTED] (6.7). Teleconference with lead counsel (.3); Analysis of 3rd party transcripts (1).	8.00 600.00/hr	4,800.00
3/3/2016	RBK Deposition (5) Appearance at deposition of [REDACTED] (8). Pre and post deposition meetings with [REDACTED] (.8). Teleconference with co-counsel (.2).	9.00 600.00/hr	5,400.00
	PS Deposition (5) Attend deposition of [REDACTED] (8). [REDACTED] (1).	9.00 350.00/hr	3,150.00
3/11/2016	PS Case Management (11) Analysis of discovery of [REDACTED] [REDACTED] (.2).	0.50 350.00/hr	175.00
	RBK Case Management (11) Correspondence regarding modifications to class rep discovery (3); Analysis of discovery of [REDACTED] (.5).	3.50 600.00/hr	2,100.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/14/2016	RBK Case Management (11) Correspondence with co-counsel regarding amended complaint (.5). Analysis of order on motion to amend (.5).	1.00 600.00/hr	600.00
	PS Discovery (3) Analysis of required modifications for discovery responses (.7). Teleconference with co-counsel re: explanation of discovery modifications and review to client (.3); [REDACTED] (.5).	1.50 350.00/hr	525.00
3/17/2016	PS Deposition (5) Analysis of [REDACTED] deposition transcript (1.5). Meeting w/RBK re: suggested errata and next steps (.5).	2.00 350.00/hr	700.00
3/18/2016	RBK Case Management (11) E-mail from co-counsel regarding settlement (.4). Analysis of settlement (2.5). Communication with [REDACTED] regarding settlement(.6).	3.50 600.00/hr	2,100.00
3/21/2016	PS Discovery (6) [REDACTED]	0.50 350.00/hr	175.00
3/30/2016	PS Case Management (11) Phone call with [REDACTED] [REDACTED] and upcoming steps in case (.5). Correspondence with co-counsel (.2). Meeting w/RBK re client call and settlement (.3)	1.00	350.00
3/31/2016	PS Discovery (6) [REDACTED]	0.30 350.00/hr	105.00
	RBK Case Management (11) Analysis of correspondence regarding settlement and client correspondence (2). Meeting w/PS re: discovery issues and protocol (.5).	2.50 600.00/hr	1,500.00
4/1/2016	PS Discovery (6) [REDACTED]	0.50 350.00/hr	175.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/4/2016	RBK Case Management (11) Meeting w/PS re: production and Bugge's ESI request and search.	1.00 600.00/hr	600.00
	PS Discovery (6) Preparation for and attendance during phone call with lead counsel, document vendor, and client, regarding document searches.	2.00 350.00/hr	700.00
4/7/2016	PS Case Management (11) [REDACTED] (.3) and analysis of transcript for errata (.5).	0.80 350.00/hr	280.00
4/12/2016	PS Case Management (11) [REDACTED]	0.70 350.00/hr	245.00
4/20/2016	PS Case Management (11) Analysis and document review regarding: [REDACTED] production (.5). [REDACTED] (.3).	0.80 350.00/hr	280.00
4/21/2016	PS Discovery (3) [REDACTED] [REDACTED] (.8). Analysis of discovery orders versus Bugge production (.2).	1.00 350.00/hr	350.00
11/8/2016	PS Case Management (11) [REDACTED] 3). [REDACTED] (.2).	0.50 350.00/hr	175.00
11/23/2016	PS Case Management (11) [REDACTED] (1.8). [REDACTED] (1). [REDACTED] (.2).	3.00 350.00/hr	1,050.00
12/19/2016	PS Case Management (11) [REDACTED] (.5). [REDACTED] (.2). [REDACTED] (.5).	1.20 350.00/hr	420.00
1/4/2017	PS Case Management (11) [REDACTED] (1). [REDACTED] (.5). [REDACTED] (.5).	2.00 375.00/hr	750.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2017 PS	Case Management (11) Analysis of statement of recent decision regarding: class certification requirements (.3). Meeting with RBK re statement of recent decision and impact on [REDACTED] (.2).	0.50 375.00/hr	187.50
1/23/2017 PS	Case Management (11) Analysis of motion to dismiss Flextronics USA's amended complaint (.5). Calendaring and case management (.3).	0.80 375.00/hr	300.00
1/30/2017 PS	Case Management (11) Analysis of motion for preliminary approval documents (.5). [REDACTED] [REDACTED] (.3).	0.80 375.00/hr	300.00
	For professional services rendered	<hr/> 125.50	<hr/> \$57,177.50
	For professional services rendered	<hr/> 125.50	<hr/> \$57,177.50

EXHIBIT E

NAME: Krause Kalfayan Benink & Slavens MONTH: June 1, 2013-February 28, 2017

**IN RE: LITHIUM ION BATTERIES INDIRECT
MONTHLY COSTS REPORT**

CATEGORY	DESCRIPTION (if necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Litigation Assessment				\$0.00
Court Costs				\$0.00
Experts/consultants				\$0.00
Federal Express				\$0.00
Hearing Transcripts		\$255.00		\$255.00
Investigation				\$0.00
Lexis/westlaw				\$0.00
Messenger/delivery				\$0.00
Photocopies - in House		\$25.40		\$25.40
Photocopies - Outside				\$0.00
Postage		\$0.48		\$0.48
Service of Process				\$0.00
Special Supplies				\$0.00
Telephone/telecopier				\$0.00
Travel		\$1,390.51		\$1,390.51
Miscellaneous		\$443.90		\$443.90
TOTAL		\$2,115.29	\$0.00	\$2,115.29