

# **EXHIBIT 25**

1 *Counsel for Indirect Purchaser Plaintiffs*

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**UNITED STATES DISTRICT COURT**

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**NORTHERN DISTRICT OF CALIFORNIA**

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**OAKLAND DIVISION**

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

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

16

MDL NO. 2420

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**DECLARATION OF GEORGE RIKOS IN  
SUPPORT OF INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES ON  
BEHALF OF LAW OFFICES OF  
GEORGE RIKOS**

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**This Document Relates to:**

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**ALL INDIRECT PURCHASER ACTIONS**

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1 I, George Rikos declare:

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

7 2. My firm has served as counsel to Bradley Van Patten and as counsel for IPPs  
8 throughout the course of this litigation. The background and experience of Law Offices of George  
9 Rikos and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

14 4. During the pendency of the litigation, Law Offices of George Rikos performed the  
15 following work: Preparing of client for deposition, meeting with client in preparation of further  
16 document production; participation in remote collection of search for potential responsive  
17 documents; analysis of proposed responses to third set of interrogatories; meet with client to  
18 discuss responses to third set of interrogatories, analysis of settlement agreements and approval of  
19 same.

20 5. Attached hereto as **Exhibit B** is a billing summary of Law Offices of George  
21 Rikos’ total hours and lodestar, computed at current billing rates, from June 1, 2013 to February  
22 28, 2017. Counsel for Plaintiffs are not seeking attorneys’ fees for any time billed prior to the  
23 appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of  
24 hours spent by Law Offices of George Rikos during this period of time was 8.5, with a  
25 corresponding lodestar based on current rates of \$2,762.50. The lodestar amount reflected in  
26 Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my  
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DECLARATION OF GEORGE RIKOS IN SUPPORT OF IPPS’ MOTION FOR AN AWARD  
OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF LAW  
OFFICES OF GEORGE RIKOS Case No. 13-md-02420-YGR (DMR)

1 law firm. This summary was prepared from contemporaneous, daily time records regularly  
2 prepared and maintained by Law Offices of George Rikos

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

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

8 8. Attached hereto as **Exhibit E** is a summary of the expenses Law Offices of George  
9 Rikos has incurred during the course of this litigation. Law Offices of George Rikos expended a  
10 total of \$400 in unreimbursed costs and expenses in connection with the prosecution of this case.  
11 These expenses were incurred on behalf of IPPs by Law Offices of George Rikos on a contingent  
12 basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from  
13 expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the  
14 expenses incurred.

15 9. I have reviewed the time and expenses reported by Law Offices of George Rikos in  
16 this case which are included in this declaration, and I affirm that they are true and accurate.

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

20 Executed on May 26, 2017 at San Diego, California.

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*/s/ George Rikos*

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George Rikos

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# **EXHIBIT A**

**Exhibit A**

I have been a licensed attorney in the State of California for approximately 18 years. My practice has primarily focused on litigation. During the course of my 18 years of practice I have been certified lead counsel in a class action lawsuit.

# **EXHIBIT B**

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

Firm Name: Law Offices of George Rikos

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
George Rikos			2.60		4.50		1.40								8.50	\$325.00	\$2,762.50
Name (P)															0.00	\$0.00	\$0.00
Name (P)															0.00	\$0.00	\$0.00
Name (OC)															0.00	\$0.00	\$0.00
Name (A)															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
<b>SUB-TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>2.60</b>	<b>0.00</b>	<b>4.50</b>	<b>0.00</b>	<b>1.40</b>	<b>0.00</b>	<b>8.50</b>		<b>\$2,762.50</b>						
<b>NON-ATTORNEYS</b>																	
Name (PL)															0.00	\$0.00	\$0.00
Name (LC)															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
<b>SUB-TOTAL</b>	<b>0.00</b>		<b>\$0.00</b>														
<b>GRAND TOTAL:</b>	<b>0.00</b>	<b>0.00</b>	<b>2.60</b>	<b>0.00</b>	<b>4.50</b>	<b>0.00</b>	<b>1.40</b>	<b>0.00</b>	<b>8.50</b>		<b>\$2,762.50</b>						

# **EXHIBIT C**



# **EXHIBIT D**

**(REDACTED)**

# Law Offices of George Rikos

225 Broadway Suite 2100

San Diego, CA 92101

Phone: (858) 342-9161 | Fax: (858) 724-1453

## Account Statement

Prepared for Brad Van Patten

Re: Van Patten v. Panasonic

Previous Invoice Amount	\$0.00
Last Payment Received	\$0.00
Previous Balance	\$0.00
Current Charges	\$3,162.50
Total Due	\$3,162.50

# Law Offices of George Rikos

225 Broadway Suite 2100

San Diego, CA 92101

Phone: (858) 342-9161 | Fax: (858) 724-1453

Brad Van Patten

Invoice Date: May 26, 2017

Invoice Number: 10176

Invoice Amount: \$3,162.50

## Matter: Van Patten v. Panasonic

### Attorney's Fees

2/2/2016	Prepare [REDACTED] for deposition	G.R.	4.50	\$1,462.50
4/13/2016	Meeting with [REDACTED] in preparation of further document production (.8); [REDACTED]	G.R.	1.90	\$617.50
4/25/2016	Receipt and analysis of proposed response to third set of interrogatories (.1); [REDACTED]	G.R.	.40	\$130.00
5/23/2016	Telephone conference with [REDACTED]	G.R.	.30	\$97.50
1/10/2017	Review and analysis of [REDACTED]	G.R.	.90	\$292.50
1/16/2017	Review and analysis of [REDACTED]	G.R.	.40	\$130.00
1/18/2017	Prepare email to co-lead counsel Ben Siegal [REDACTED]	G.R.	.10	\$32.50
<b>SUBTOTAL:</b>			<b>8.50</b>	<b>\$2,762.50</b>

### Costs

4/28/2017	Original Filing Fee (October 2012) with Southern District of California			\$400.00
<b>SUBTOTAL:</b>				<b>\$400.00</b>

TOTAL: \$3,162.50  
PREVIOUS BALANCE DUE: \$0.00  
CURRENT BALANCE DUE AND OWING: \$3,162.50

# **EXHIBIT E**

**EXHIBIT E**

In re Lithium Ion Batteries Antitrust Litigation

**LAW OFFICES OF GEORGE RIKOS**

Reported Expenses Incurred on Behalf of IPPs

**EXPENSE REPORT**

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	\$400
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at \$0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
<b>TOTAL:</b>	\$400