

EXHIBIT 31

1 *Counsel for Indirect Purchaser Plaintiffs*
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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

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

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

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19 **This Document Relates to:**
20 **ALL INDIRECT PURCHASER ACTIONS**
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**DECLARATION OF MARC G. REICH IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES ON
BEHALF OF REICH RADCLIFFE &
HOOVER LLP**

1 I, Marc G. Reich, declare:

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

7 2. My firm has served as counsel to class representative Tom Pham and as counsel for
8 IPPs throughout the course of this litigation. The background and experience of RRH and its
9 attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

10 3. RRH has prosecuted this litigation solely on a contingent-fee basis, and has been at
11 risk that it would not receive any compensation for prosecuting claims against the defendants.
12 While RRH 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, RRH performed the following work:
15 Updated Mr. Pham on the status of and developments in the case and responded to his questions;
16 obtained and organized documents and information from Mr. Pham relating to his purchases of
17 lithium ion batteries and products; drafted and revised discovery responses for Mr. Pham and
18 organized his document production; and prepared Mr. Pham for and defended his deposition.

19 5. Attached hereto as **Exhibit B** is a billing summary of RRH’s total hours and
20 lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for
21 Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead
22 counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by RRH
23 during this period of time was 96.8, with a corresponding lodestar based on current rates of
24 \$55,935.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel,
25 and was performed by professional staff at my law firm. This summary was prepared from
26 contemporaneous, daily time records regularly prepared and maintained by RRH.

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

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

6 8. Attached hereto as **Exhibit E** is a summary of the expenses RRH has incurred
7 during the course of this litigation. RRH expended a total of \$151.41 in unreimbursed costs and
8 expenses in connection with the prosecution of this case. These expenses were incurred on behalf
9 of IPPs by RRH on a contingent basis and have not been reimbursed. The expenses reflected in
10 **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an
11 accurate recordation of the expenses incurred.

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

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

17 Executed on May 23, 2017 at Newport Beach, CA.

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/s/ Marc G. Reich

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Marc G. Reich

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EXHIBIT A

REICH RADCLIFFE & HOOVER

L•L•P

ATTORNEYS AT LAW
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NEWPORT BEACH, CALIFORNIA 92660
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REICHRADCLIFFE.COM

PARTNERS
MARC G. REICH
RICHARD J. RADCLIFFE
ADAM T. HOOVER

OF COUNSEL
MATTHEW R. SEIFEN
BYRON S. AHN

FIRM PROFILE

Marc G. Reich founded the practice on January 1, 1999. That practice has grown into Reich Radcliffe & Hoover LLP, an innovative law firm that has established a network of attorneys and affiliated law firms to meet the civil litigation and business law needs of its clients. Because of the firm's resources, it can expand or contract to efficiently meet the needs of a particular case or matter, without unnecessary overhead expenses. It is committed to providing high quality, responsive and efficient legal services. The firm is currently litigating several cases with amounts in dispute in the tens of millions of dollars. The firm has received an AV rating from Martindale-Hubbell. Martindale-Hubbell is a legal directory service that has been in existence for more than 133 years and currently maintains a database of over one million lawyers and law firms in 160 countries. The AV rating is Martindale-Hubbell's highest rating and is reserved for firms with very high to preeminent legal ability, and professional and ethical standards.

The firm's clients have included 5thGearSolution, LLC, Acta Laboratories, Advanced Systems Integration, Inc., America West Properties, Inc., Aquatic Rehab and Consulting, Axa Assistance Deutschland GMBH, Bigfoot Entertainment, Ltd., Bigfoot Productions, Inc., Bigfoot Ventures, Ltd., BioData Radiology Services, Inc., Bob-Leon Plastics, Inc., Cam Steel Company, Inc., Canales Holdings Incorporated, Centurion Capital Group, Inc., Chroma Systems Solutions, Inc., The College Network, Columbus Bank & Trust Co., Copy Resources, Inc., DatCard Systems, Inc., De Novo Corporation, Do Justly, LLC, Dynasty Plumbing, Inc., Fairbanks Enterprises, Inc., FileKeepers, LLC, Financial Advisors, Inc., Getac, Harbor Objects, LLC, Gosiger, Inc., Hycor Biomedical LLC, Hyter Development Company, Inter Partner Assistance Service GMBH, Global Solutions, Inc., Inter Partner Assistance SA, J & R Imports, Ltd., Kistler & Kistler, Inc., Louisiana Seafood Importers, Lyon Management Group, Inc., Lyon Realty Advisors, Majesco Entertainment, MarKei Contractors, MasterCare Protection & Cleaning, Inc., Maximal Intensity Projection, LLC, Max Q Systems, Inc., Messenger Investment Compan, Microsemi Real Estate, Inc., Multi Sales, Inc., NextPat Ltd., Oceanview Wireless, LLC, OleumTech Corporation, Oceanview Wireless, LLC, Palmar and Company, Payment Resources International, LLC, Pilar M. De Castro & Co., Inc., Pomona Valley Educational Foundation, The Ranch Sports Grill, Inc., Southern California Mobile Xray LLC., Redline Remarketing, Inc., Shoreline Pools and Spas, Spartan Motors, Inc., StatMobile, Inc., Strategic Restaurant Engineering Inc., Taitron Components Incorporated, Terescription, Teamwork Athletic Apparel, Inc., The Most Organization, Inc., The Senna Corp., The William Lyon Property Management Company, TransFirst, LLC, TransFirst ePayment Services, Inc., Transworld Benefits, Inc.,

United Futbol Club, Dr. Jose R. Valdez, Valley Academies Foundation, and Vivien and Gloria Enterprises, Inc.

A significant portion of the firm's practice includes class action and shareholder derivative litigation. The firm has been sole lead counsel in the following class action lawsuits: Garcia et al. v. Pilar M. De Castro & Co. et al, OCSC Case No. 03CC03340 (Wage and Hour Overtime Class Action), Reis v. The William Lyon Company et al., OCSC Case No. 04CC1093 (Unfair Competition and Class Action) and Levante et al. v. Pilar M. De Castro & Co., OCSC Case No. 30-2015-00789615 (Wage and Hour Meal and Rest Break Class Action) The firm has been co-lead counsel in the following class action lawsuits: Runner et al. v. United Parcel Service, Inc., OCSC Case No. 04CC0096 (Nationwide Breach of Contract Class Action) and Berryman et al. v. Merit Property Management, Inc. et al., OCSC Case No. 05CC0056 (Unfair Competition and Class Action). In addition, The firm has actively participated in the following class and derivative action lawsuits: Vitamin Cases, J.C.C.P. No. 4076 (Indirect Purchaser Antitrust Class Action), Polyester Staple Antitrust Litigation, JCCP No. 4278 (Indirect Purchaser Antitrust Class Action), California Indirect Purchaser MSG Antitrust Cases, JCCP No. 304471 (Indirect Purchaser Antitrust Class Action), Kistler & Kistler, Inc. v. Bowater, Inc., et al., S.F. Super. Ct. Case No. CGC-05-438152 (Indirect Purchaser Antitrust Class Action), In re: Cellphone Termination Fee Cases, JCCP No. 4332 (Unfair Competition and Class Action), Freeland et al. v. AT&T Corp. et al., MDL Master File 02 Civ. 2637 (Direct Purchaser Antitrust Class Action), In Re Wireless Telephone 911 Calls Litigation, MDL Docket No. 1521 (Unfair Competition and Class Action), Automobile Antitrust Cases I, II, JCCP Nos. 4298 and 4303 (Indirect Purchaser Antitrust Class Action), Pfeiffer derivatively on Behalf of Activision, Inc. v. Kotick et al., C.D. Cal. Case No. CV-06-04771-MRP(JTLx) (Options Backdating Derivative Action), Milton Pfeiffer, derivatively on Behalf of Corinthian Colleges, Inc., C.D. Cal. Case No. CV-06-0777-JVS(ANx) (Options Backdating Derivative Action), In Re: Processed Egg Products Antitrust Litigation, MDL No. 2002 08md02002 (Indirect Purchaser Antitrust Class Action), In Re: Automotive Parts Antitrust Litigation, Master File No. 12-md02311(Indirect Purchaser Antitrust Class Action); In Re: Lithium Batteries Antitrust Litigation, MDL No. 2420 (Indirect Purchaser Antitrust Class Action), In Re Korean Ramen Antitrust Litigation, N.D. Cal. Case No. 3:13cv04115WHO (Indirect Purchaser Antitrust Class Action), Gastelum v. Verizon California Inc., San Francisco County Superior Court Case No. CGC-11-511467 (Unfair Competition and Class Action), Roof v. Scott, et al., 2:14-CV-03777-CAS-JEM (Growlife Derivative Action), Bernstein v. Anzalone, et al., 2:14-CV-09247-CBM-AS (Arrowhead Research Derivative Action), da Luz v. Park, et al. SFSC No. CGC 16-552062 (Consolidated FitBit Class Action), Weichel v. Banatao, et al., Alameda SC No. RG15783287 (Ikanos Class Action), McDonald v. Oronsky, et al., Alameda SC No. RG17850330 (Dynavax Derivative Action), Kilpatrick v. Simon, et al. LASC No. BC623167 (Capstone Turbine Derivative Action).

Brief profiles on the attorneys practicing at the firm are listed below. In addition, the firm at times co-counsels with Spach, Capaldi & Waggaman, LLP of Newport Beach and San Diego, and/or Bramson, Plutzik, Mahler & Birkhaeuser, LLP of Walnut Creek in complex business litigations.

Marc G. Reich

Marc has received an individual AV rating from Martindale-Hubbell, its highest rating, and has been named a Southern California Rising Star and a Southern California Super Lawyer by the Publishers of Los Angeles Magazine and Law & Politics, a distinction reserved for only 5 percent of lawyers practicing in Southern California. Marc has also been listed as one of the top attorneys in Orange County, California by Orange Coast Magazine. Marc is licensed to practice before all the State and Federal Courts in California and before the Ninth and Fourth Circuit Courts of Appeals. His practice emphasizes business litigation and business law. He has litigated hundreds of cases, and has had fifteen trials, including four jury trials. Recently, Marc obtained a defense verdict in a premises liability case in which the plaintiff sought more than \$1 million in compensatory and punitive damages and was part of a trial team that obtained a verdict that would have resulted in more than a \$100 million recovery to a class of California consumers (the case settled after appeal). Marc has also taught continuing education seminars on deposition taking skills.

Marc graduated from UC Davis Law School in 1991, where he finished in the top 15% of his class. Upon graduation, Marc clerked for the Honorable Justice Warren Matthews of the Supreme Court of Alaska. After his clerkship, Marc entered private practice as an associate at Irell & Manella. Before law school, Marc worked as an accountant for Ernst & Whinney, where Marc passed the CPA Examination.

Marc is involved in his community. Marc is a past treasurer of the Melinda Heights Elementary School PTA, is president of his homeowners' association, is the treasurer of the United Futbol Club and is on the Board of Directors of the Orange County Child Abuse Prevention Center. Marc resides in Rancho Santa Margarita with his wife and three children.

Richard J. Radcliffe

Richard J. Radcliffe was formerly a named partner in the AV-rated law firm, Capretz & Radcliffe LLP of Newport Beach, California, and has worked in the Office of General Counsel for Ernst & Young, LLP. He also served as a litigation attorney in the First Amendment and business litigation law firm of Spach, Capaldi & Waggaman, LLP of Newport Beach and San Diego, California. Richard is licensed to practice before all the State and Federal Courts in California and the United States Tax Court. His practice emphasizes business and real estate litigation, appellate advocacy, and business planning and counseling.

Richard holds several graduate degrees. He earned his Juris Doctor degree from Loyola Law School in 1991, where he was an editor of the Law Review, and received the *American Jurisprudence* Award in Trial Advocacy. In addition, Richard has received an advanced law degree, an L.L.M. in Taxation, from the University of San Diego School of Law. On top of his law degrees, Richard has earned an M.A. in Theology from Fuller Theological Seminary, School of Theology, with a 3.80 GPA. He obtained a B.S., *summa cum laude*, studying accounting, business management, and public administration, from Biola University in 1988 where he finished number one in his class, with a 4.0 GPA. Richard was a member of the Board of Directors and an officer of his homeowner's association, and has obtained a California Real

Estate Broker's License (inactive).

Adam T. Hoover

Adam joined the firm in 2005 after graduating from Texas Tech School of Law. Adam was a member of the Texas Tech Law Review, where he served as Manuscript Editor in 2003 and Technology Editor in 2004. In 2005, Adam published a Law Review article on FCC telecommunication rule-making procedures. Since joining the firm in 2006, Adam has litigated disputes in business contracts, real estate, commercial debt collection and employment law. Adam has been involved in four trials and has made appellate arguments before the Second District Court of Appeal. Adam frequently represents credit card processing companies and has litigated over twenty disputes on their behalf.

Adam also assists clients with their transactional needs, including copyright and trademark filings, corporate transactions, employment contracts and compliance research. Adam is a member of the Litigation Section of the State Bar of California and the Business Litigation Section of the Orange County Bar Association.

Matthew R. Seifen

Matt is Of Counsel to the firm. Matt has been practicing law in the State of California since 1997. He is licensed to practice before all State Courts in California, as well as in the Southern and Central District Federal Courts in California. His practice is focused upon handling litigation matters, most of which involve business, real estate or construction disputes. Matt has litigated numerous cases and taken several cases through trial and arbitration. He has also argued cases before the Second District Court of Appeal.

Matt graduated from the University of San Diego, School of Law in 1997 where he was awarded the Order of Barristers and was a National Team Member of the Law School's Appellate Moot Court Board.

Matt is a member of the Orange County Bar Association and a member of the Business Litigation Section of the Orange County Bar Association.

Byron S. Ahn

Byron is Of Counsel to the firm. Byron is a 2012 graduate of the University of California Davis School of Law. Byron was an editor for the UC Davis Law Review, where he served as Associate Articles Editor in 2012. Byron also created and co-taught a seminar on the laws and regulations related to the gaming industry. Byron is involved with all of the firm's litigation matters, including disputes in business contracts, employment, and antitrust law.

Byron is a sports enthusiast and loves rooting for his two favorite teams, the UCLA Bruins and the SF Giants. Byron is active in his community and a member of the Los Angeles County Bar Association.

EXHIBIT B

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

Firm Name: Reich Radcliffe & Hoover 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
Marc Reich (P)	1.90		22.70		37.70				13.60						75.90	\$675.00	\$51,232.50
															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	1.90	0.00	22.70	0.00	37.70	0.00	0.00	0.00	13.60	0.00	0.00	0.00	0.00	0.00	75.90		\$51,232.50
NON-ATTORNEYS																	
Janna Choi			13.9		6.10				0.90						20.90	\$225.00	\$4,702.50
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
SUB-TOTAL	0.00	0.00	13.90	0.00	6.10	0.00	0.00	0.00	0.90	0.00	0.00	0.00	0.00	0.00	20.90		\$4,702.50
GRAND TOTAL:	1.90	0.00	36.60	0.00	43.80	0.00	0.00	0.00	14.50	0.00	0.00	0.00	0.00	0.00	96.80		\$55,935.00

EXHIBIT C

EXHIBIT D

(REDACTED)

5/19/2017
8:25 PMReich Radcliffe & Hoover LLP
Slip Listing

Page 1

Selection Criteria

Slip Classification	Open
Slip Slip Type	Time
Slip Date	7/1/2013 - 2/28/2017
Client Selection	Include: Class/LithiumIonBatteries

Slip ID	Dates and Time	Timekeeper	Activity	Status	Client	Description	Reference	Units	Rate	Slip Value
51389	7/1/2013	MGR	BC9	TIME	Class/LithiumIonBatteri	WIP		1.80	575.00	1035.00
Telephone call with [REDACTED] 1AC. (.1) Review 1AC. (1.2) [REDACTED]. (.1) Telephone call with [REDACTED] (.3) Draft email to lead counsel confirming accuracy of info in complaint pertaining to [REDACTED] (.1)										
41047	7/1/2013	MGR	BC9	TIME	Class/LithiumIonBatteri	WIP		1.70	575.00	977.50
Review prot order. (.4) Draft email to [REDACTED] (.1) Sev telephone calls with Chris Le re: same. (.2) Review protective order with client. (.8) Review his executed and completed exh. A. (.1) Draft email to lead counsel attaching same. (.1)										
43622	4/14/2014	MGR	BC9	TIME	Class/LithiumIonBatteri	WIP		1.00	575.00	575.00
Review amended complaint filed on 4/11. (.9) Draft email to client [REDACTED] attaching same. (.1)										
45045	9/20/2014	MGR	BC1	TIME	Class/LithiumIonBatteri	WIP	5:31 PM	1.20	575.00	690.00
Review letter from Williams requesting additional info fr [REDACTED]. (.1) Review file for info we already have for [REDACTED] (1.0) Draft email to [REDACTED] requesting any additional info. (.1)										
45064	9/29/2014	MGR	BC1	TIME	Class/LithiumIonBatteri	WIP	6:52 AM	0.70	575.00	402.50
Review preservation decl received back from [REDACTED]. (.1) Draft email to him to confirm that he has no other docs relating to his battery purchases other than the docs we already provided to lead counsel. (.2) Review and respond to email from him re same. (.2) Draft email to Lasha Garcia and Jaclyn Verducci (CPM firm) re same. (.2)										

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Slip Listing

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
45080	TIME 10/2/2014 3:30 PM WIP	MGR	BC9 Class/LithiumIonBatteri	1.50	575.00	862.50
	Review doc no. 512 - Order on Motions to Dismiss. (1.3) Draft email to [REDACTED] attaching same. (.2)					
45239	TIME 10/22/2014 7:06 PM WIP	MGR	BC9 Class/LithiumIonBatteri	0.80	575.00	460.00
	Quickly review 3 AC. (.6) Draft email to Steve Williams re omission of one of [REDACTED] purchases. (.2)					
46233	TIME 4/28/2015 10:53 AM WIP	MGR	BC3 Class/LithiumIonBatteri	1.40	625.00	875.00
	Review Rog Set 1 to IPPs and RPPs Set 1 to IPPs. (.4) [REDACTED] [REDACTED] (.8) [REDACTED] [REDACTED] (.2)					
46237	TIME 4/28/2015 5:01 PM WIP	MGR	BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
	Review and respond to email from [REDACTED] re his availability for a conf call re discovery responses and re discovery process.					
46238	TIME 4/28/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
	[REDACTED]					
46243	TIME 4/29/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
	Review and respond to email from Carla Voigt re conf call with [REDACTED] [REDACTED]					
46245	TIME 5/1/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	1.40	625.00	875.00
	[REDACTED] Dave Young, Alicia Gutierrez and Carla Voigt [REDACTED]					

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Slip Listing

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
46733	TIME 5/5/2015 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	2.10	175.00	367.50
	Meeting with M. Reich and [REDACTED] re documents and responses to discovery requests.					
46251	TIME 5/5/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	2.10	625.00	1312.50
	Travel to and from Irvine Spectrum to meet with [REDACTED] and JC for lunch to discuss how JC can help in locating docs responsive to doc requests. Spent .7 hours traveling and 1.4 hours at lunch meeting.					
46776	TIME 5/6/2015 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	1.50	175.00	262.50
	Review operative complaint, outstanding discovery requests and docs and info we have obtained from [REDACTED] to date.					
46257	TIME 5/6/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
	Telephone call from Carla Voigt re time table for providing additional docs and info for [REDACTED]					
46256	TIME 5/6/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	0.70	625.00	437.50
	Draft email to JC re: case background and attaching operative complaint, outstanding discovery requests and docs and info we have obtained from [REDACTED] to date.					
46255	TIME 5/6/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
	Review and respond to email from Carla Voigt re status of [REDACTED] document collection.					
46734	TIME 5/7/2015 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	3.90	175.00	682.50
	Review email from M. Reich and Carla Voigt re requested items (.2) Prepare chart reflecting request for same (.5) ; Draft email to [REDACTED] re chart (.2); begin reviewing the documents and websites for responsive information (2.1); [REDACTED]					

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8:25 PMReich Radcliffe & Hoover LLP
Slip Listing

Page 4

Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
	(.9).					
46259	TIME 5/7/2015 10:21 AM WIP	MGR	BC3 Class/LithiumIonBatteri	0.60	625.00	375.00
	Review spreadsheet created by JC to track info responsive to discovery requests. (.2) Compare it to list of additional info needed contained in yesterday's email from Carla. (.1) [REDACTED] (.2) Draft email to Janna and Tom re same. (.1)					
46266	TIME 5/7/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
	Draft email to JC containing distribution list of attys who should receive [REDACTED] info.					
46735	TIME 5/8/2015 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	0.40	175.00	70.00
	Draft email to counsel re forwarding photos responsive to the request and corresponding chart reflecting responses to the discovery request (.2); Review email from and call from M. Reich re same (.2).					
46270	TIME 5/8/2015 12:31 PM WIP	MGR	BC3 Class/LithiumIonBatteri	1.10	625.00	687.50
	Telephone call with Carla re status of [REDACTED] info. (.2) Several calls with Janna re same. (.4) Review spreadsheet prepared by Janna. (.3) Review additional docs obtained from [REDACTED] (.2)					
46385	TIME 5/11/2015 WIP	MGR	BC3 Class/LithiumIonBatteri	1.90	625.00	1187.50
	[REDACTED]					
46384	TIME 5/11/2015 12:37 PM WIP	MGR	BC3 Class/LithiumIonBatteri	1.10	625.00	687.50
	Telephone call with David Young re [REDACTED] availability to sign a verification (.1). Review draft response for [REDACTED] to Sp. Rogs (.4).					

5/19/2017
8:25 PMReich Radcliffe & Hoover LLP
Slip Listing

Page 5

Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Reference	Units	Rate	Slip Value
			Telephone call with David Young re my suggested changes to response (.3). [REDACTED] (.3).							
46387	5/12/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.30	625.00	187.50
			Draft email to David Young requesting service copies of [REDACTED] discovery responses (.1). Review final versions of discovery responses (.2).							
47182	9/15/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.40	625.00	250.00
			Review and respond to email from Carla Voigt re need for Pham to search is computer (.1). [REDACTED] (.1). [REDACTED] (.1). Several calls with Carla to arrange time for conf call with Pham (.1).							
47191	9/18/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.10	625.00	62.50
			Review and respond to email from Carla re call with Tom on Monday.							
47197	9/21/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.10	625.00	62.50
			Review and respond to email from Carla Voigt re today's conference call.							
47619	11/11/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.30	625.00	187.50
			Review response to 2nd set of rogs (.2) [REDACTED] (.1).							
47628	11/12/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.20	625.00	125.00
			[REDACTED]							
47629	11/13/2015	WIP		MGR	BC3	Class/LithiumIonBatteri		0.30	625.00	187.50
			Review and respond to email from Carla Voigt re status of verification. (.1) [REDACTED] (.05) Review verification received from [REDACTED] (.05) Draft email to Voigt attaching same. (.05).							

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
47890	TIME 1/22/2016 11:53 AM	MGR	BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
	Review and respond to email from Carla [REDACTED] depo. (.1) Draft email to Pham re same. (.1)					
48671	TIME 1/24/2016 WIP	Janna Choi	BC9 Class/LithiumIonBatteri	0.90	175.00	157.50
	Review email from M. Reich re Fourth Amended Complaint (.1). Quickly review same (.8).					
47892	TIME 1/24/2016 2:02 PM WIP	MGR	BC9 Class/LithiumIonBatteri	0.90	625.00	562.50
	Quickly review IPP motion for class cert. (.6) [REDACTED] (.1)					
47891	TIME 1/24/2016 2:02 PM WIP	MGR	BC5 Class/LithiumIonBatteri	0.70	625.00	437.50
	Review email from [REDACTED] re his availability for depo and depo prep. (.1) Several telephone calls with Tom re same and about deposition process. (.6)					
47927	TIME 1/27/2016 8:09 AM WIP	MGR	BC5 Class/LithiumIonBatteri	0.30	625.00	187.50
	Draft email to Voigt re availability for depo					
47968	TIME 2/2/2016 7:20 PM WIP	MGR	BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
	Review and respond to email from Voigt re Pham depo availability in late Feb and March (.1). [REDACTED] (.1).					
48673	TIME 2/5/2016 WIP	Janna Choi	BC5 Class/LithiumIonBatteri	0.20	175.00	35.00
	Review email to and from Carla Voigt and [REDACTED] re deposition scheduling.					
47971	TIME 2/7/2016 10:25 AM WIP	MGR	BC5 Class/LithiumIonBatteri	0.20	625.00	125.00

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Slip ID	Dates and Time	Status	Description	Timekeeper Activity Client Reference	Units	Rate	Slip Value
			Phone call with [REDACTED] re his depo availability.				
47972	2/8/2016	WIP		MGR BC5 Class/LithiumIonBatteri	0.30	625.00	187.50
	TIME 10:26 AM		Compare Pham depo availability with my calendar. Draft email to Voigt re same.				
47982	2/10/2016	WIP		MGR BC5 Class/LithiumIonBatteri	0.50	625.00	312.50
	TIME 2:36 PM		Review email from Voigt from yesterday re probable date for [REDACTED] depo and related matters (.1). [REDACTED] (.1). Quickly review protective order (.2). Draft email to Voigt re same (.1).				
47985	2/11/2016	WIP		MGR BC5 Class/LithiumIonBatteri	0.10	625.00	62.50
	TIME		Review and respond to email from Voigt confirming 3/16 as date for Pham depo.				
48688	3/1/2016	WIP		Janna Choi BC3 Class/LithiumIonBatteri	1.20	175.00	210.00
	TIME		Review emails from M. Reich re [REDACTED] discovery responses (.2); review email from M. Reich re [REDACTED] deposition schedule (.1). Review files for docs [REDACTED] provided to firm and compare them to doc produced for him (.9).				
48146	3/1/2016	WIP		MGR BC5 Class/LithiumIonBatteri	1.70	625.00	1062.50
	TIME 1:43 PM		Review email from Voigt requesting confirmation about docs in [REDACTED] [REDACTED] (.1). Telephone call with Voigt re review our spreadsheet of applicable Pham purchases and our rog responses for [REDACTED] and to discuss what type of docs RFP 7 and 9 requests and whether docs [REDACTED] created for personal or business use would be responsive (.4). Telephone call with [REDACTED] re same and dates and times for his prep sessions, to confirm we have all his battery related docs and to do some depo prep (.9). Draft several emails to Voigt re same (.3).				
48172	3/4/2016	WIP		MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
	TIME						

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status		Client				
Description		Reference				
			Review and respond to email from Kathy Hoek re rescheduling time for telephonic depo prep (.1). Telephone call with Tom re same (.1).			
48179	TIME	MGR		1.80	625.00	1125.00
3/7/2016	9:21 PM	BC5				
WIP		Class/LithiumIonBatteri				
			Prepare for tomorrow's dep prep session with Pham (1). Review and respond to email from Krysta Kauble Pachman re complying with protective order (.2). Review and respond to email from Kathryn Hoek re Pham's email search (.3). Review and respond to email from Kathryn Hoek re payment records for Pham's purchases (.3).			
48690	TIME	Janna Choi		0.50	175.00	87.50
3/8/2016		BC3				
WIP		Class/LithiumIonBatteri				
			Review email from Carla Voigt re follow-up and additional Tom Pham document production, discovery responses (.2); call with M. Reich re same (.3).			
48407	TIME	Janna Choi		0.90	175.00	157.50
3/8/2016		BC3				
WIP		Class/LithiumIonBatteri				
			Review series of emails from counsel regarding deposition, documents and discovery responses for Tom Pham (.3); call with M. Reich regarding obtaining Dell Financial invoices and records for Tom Pham; review files for Dell account information for Tom Pham (.2). Contact Dell re same (.4).			
51390	TIME	MGR		1.30	625.00	812.50
3/8/2016		BC3				
WIP		Class/LithiumIonBatteri				
			Review and respond to email from Hoek re whether Pham took tax deductions for his battery related purchases. (.2) Review draft Supp Rog Responses for Tom Pham. (.3) Draft email to Hoek re changes to consider to it. (.2) Review Pham's responses to doc demands (.4). Draft email to Krysta Pachman that we have provided all responsive docs to lead counsel. (.2)			
48180	TIME	MGR		2.90	625.00	1812.50
3/8/2016	12:14 PM	BC5				
WIP		Class/LithiumIonBatteri				
			Telephone call with Pham in advance of telephonic depo prep call. (.3) Telephone call with Kathy Hoek in advance of telephonic depo prep call. (.2) Participate in telephonic depo prep call. (1.1) Telephone call with Pham to supervise search of terms in his email acct (this was a separate call from the telephonic depo prep call). (.5) Review file for documents Pham provided to us. (.6) Draft email to Hoek re same. (.2)			

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
48185	TIME 3/8/2016 8:29 PM	WIP	MGR BC5 Class/LithiumIonBatteri	0.30	625.00	187.50
Review papers ISO of IPP request to amend complaint (.2). Review docket no. 1138 Defendants' List of Deficiencies in IPPs' Demonstrative (.1). In particular, look for any references to [REDACTED]						
48186	TIME 3/8/2016 8:39 PM	WIP	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Review email from Krysta Pachman re: why we are leaving [REDACTED] game controller purchases in suppl rog respond (1). Review and revise verification (.1). [REDACTED] . (.1)						
48190	TIME 3/9/2016 3:23 PM	WIP	MGR BC5 Class/LithiumIonBatteri	0.40	625.00	250.00
Review and respond to email from Hoek re change in [REDACTED] depo starting time and location. (.1) Review and respond to email from [REDACTED] re same. (.1) [REDACTED] . (.2)						
48191	TIME 3/10/2016	WIP	MGR BC5 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Hoek re change in [REDACTED] depo to 9:30 a.m.						
48195	TIME 3/14/2016 11:51 AM	WIP	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Hoek re obtaining [REDACTED] verification to amended rog resp (.1). Review and respond to email for [REDACTED] re same (.05). Telephone call with [REDACTED] re same (.05).						
48194	TIME 3/14/2016	WIP	MGR BC5 Class/LithiumIonBatteri	0.40	625.00	250.00
[REDACTED] (.2). Update notes for prep of [REDACTED] accordingly (.2).						
48196	TIME 3/14/2016 12:05 PM	WIP	MGR BC3 Class/LithiumIonBatteri	1.40	625.00	875.00

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status		Client				
Description		Reference				
			Review email from Krysta Pachman re: amended RFP responses and need to get verifications from [REDACTED]. Review draft responses and verifications. (.6) Exchange several emails with [REDACTED] re same. (.3) Draft email to Krysta re same. (.1) Review and respond to email from Hoek re same. (.2) Review and respond to email from Hoek re amended depo notice to [REDACTED]. (.1) Call with Demetrius Lambrinos re obtaining Toshiba doc demands. (.1)			
48197	TIME 3/14/2016 2:25 PM	WIP	MGR BC5 Class/LithiumIonBatteri	6.90	625.00	4312.50
			Prepare for tomorrow's dep prep session with [REDACTED], including reviewing 4th amended complaint, reviewing and highlighting key questions from 165 page depo transcript of [REDACTED] and 304 page depo tr. of [REDACTED] and updating depo prep outline.			
48737	TIME 3/15/2016	WIP	Janna Choi BC5 Class/LithiumIonBatteri	2.20	175.00	385.00
			Attend portions of dep prep session with [REDACTED]			
48198	TIME 3/15/2016	WIP	MGR BC5 Class/LithiumIonBatteri	5.80	625.00	3625.00
			[REDACTED]			
48199	TIME 3/16/2016	WIP	MGR BC5 Class/LithiumIonBatteri	10.90	625.00	6812.50
			Travel to from Rancho Santa Margarita to Huntington Beach to pick up [REDACTED] (.1.1). . Travel from HB to LA (.1.3) Defend [REDACTED] at deposition (6). Travel back to [REDACTED] to drop [REDACTED] off at his house (1.5). Travel from [REDACTED] back to Rancho Santa Marg. (1)			
48206	TIME 3/19/2016 12:02 PM	WIP	MGR BC9 Class/LithiumIonBatteri	0.90	625.00	562.50
			[REDACTED]			
48205	TIME 3/19/2016 11:53 AM	WIP	MGR BC9 Class/LithiumIonBatteri	0.20	625.00	125.00
			Review and respond to email form Colleen Cleary [REDACTED]. Pointed out error in par 396 of 4 AC.			

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
48693	TIME 3/21/2016 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	1.20	175.00	210.00
	Call from M. Reich re conference call for [REDACTED] documents; participate in conference call re native format for photos; review further email from Demetrius Lambrinos re same.					
48210	TIME 3/21/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	1.20	625.00	750.00
	Conf call with Demitrius, Supreet Singh, Thomas Matzen and [REDACTED] re metadata in Pham doc production.					
48212	TIME 3/21/2016 WIP	MGR	BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
	Review and revise Hoek summary of [REDACTED] depo.					
48209	TIME 3/21/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.40	625.00	250.00
	[REDACTED] [REDACTED] (.1). (.1). Call with Demetrius re same (.1). Draft email to Demetrius re same (.1).					
48208	TIME 3/21/2016 WIP	MGR	BC9 Class/LithiumIonBatteri	0.40	625.00	250.00
	[REDACTED]					
48207	TIME 3/21/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
	Review and respond to email from Colleen Cleary re [REDACTED] [REDACTED]					
48694	TIME 3/22/2016 WIP	Janna Choi	BC5 Class/LithiumIonBatteri	3.70	175.00	647.50
	Review additional emails from Supreet Singh re native production (.3); review files for photos and production (2.9); review and respond to several emails re same and re procedure (.5)					

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
48214	TIME 3/22/2016 WIP	MGR	BC5 Class/LithiumIonBatteri	0.50	625.00	312.50
Review rough version of [REDACTED] depo tr (.4). Draft email to him attaching same (.1).						
48213	TIME 3/22/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Exchange texts and emails with JC re providing native versions of [REDACTED] docs.						
48695	TIME 3/23/2016 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	0.60	175.00	105.00
Review email from Supreet Signh re issues with photo production (.2) call with Supreet Signh to resolve same(.4).						
48697	TIME 3/25/2016 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	1.40	175.00	245.00
Review email from Supreet Signh re continuing problems with photo produciton (.2); further review and convert native file (1.0); draft email to Supreet Signh re status (.2).						
48223	TIME 3/29/2016 WIP	MGR	BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Hoek re preparing errata to [REDACTED] depo.						
48236	TIME 3/31/2016 WIP	MGR	BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Draft email to [REDACTED] re correcting his depo tr.						
48230	TIME 3/31/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.60	625.00	375.00

[REDACTED] (.1).
[REDACTED] (.05). [REDACTED] (.05).
[REDACTED] (.1).
[REDACTED] (.1).
[REDACTED] (.1). Draft email to Demetrius re same (.1).

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
48698	TIME 4/1/2016 WIP	Janna Choi	BC3 Class/LithiumIonBatteri	0.20	225.00	45.00
	Review emails from Demetrius Lambrinos, M. Reich and B. Kim re [REDACTED]					
48247	TIME 4/6/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	1.60	625.00	1000.00
	Draft email to [REDACTED] remind him of today's conf call (.1). Prepare for call (.2). [REDACTED]					
48269	TIME 4/9/2016 WIP	MGR	BC9 Class/LithiumIonBatteri	0.40	625.00	250.00
	[REDACTED]					
48281	TIME 4/12/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
	Review and respond to email from Demetrius X. Lambrinos re draft responses to the Defendants Third Set of Interrogatories					
48599	TIME 4/21/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.50	625.00	312.50
	Review Ds 3rd set of Rogs (.1). Review draft responses for [REDACTED] (.1). Review and revise his decl (.1). Draft email to him re same (.1). [REDACTED]					
48606	TIME 4/22/2016 WIP	MGR	BC3 Class/LithiumIonBatteri	0.40	625.00	250.00
	Review email from Lead Counsel re: [REDACTED] providing wrong verification (.1). Draft email to Pham re same (.1). Draft email to lead counsel re same (.1). Telephone call with Demetrius re same (.1).					
48614	TIME 4/24/2016 WIP	MGR	BC5 Class/LithiumIonBatteri	2.10	625.00	1312.50
	Review [REDACTED] depo tr (2.0). Draft email to lead counsel re same (.1).					

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Slip ID	Dates and Time	Timekeeper	Activity	Units	Rate	Slip Value
Status	Description	Client	Reference			
50557	TIME 12/20/2016	MGR	BC9 Class/LithiumIonBatteri	0.50	675.00	337.50
	WIP					
[REDACTED]						
50558	TIME 12/21/2016	MGR	BC9 Class/LithiumIonBatteri	0.10	675.00	67.50
	WIP					
[REDACTED]						
50592	TIME 1/4/2017 10:27 PM	MGR	BC9 Class/LithiumIonBatteri	0.40	675.00	270.00
	WIP					
[REDACTED]						
50597	TIME 1/5/2017	MGR	BC9 Class/LithiumIonBatteri	0.10	675.00	67.50
	WIP					
[REDACTED]						
50699	TIME 1/24/2017 6:27 PM	MGR	BC9 Class/LithiumIonBatteri	0.40	675.00	270.00
	WIP					
Review Papers Filed ISO Mot For Prelim Approv of Sett with Hitachi and Maxell						
Grand Total						
				Billable	96.80	50870.00
				Unbillable	0.00	0.00
				Total	96.80	50870.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
 Reich Radcliffe & Hoover LLP
 Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
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	\$151.41
TOTAL:	\$151.41