

EXHIBIT 32

1 *Counsel for Indirect Purchaser Plaintiffs*

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**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 STEVE CIKES IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES ON
BEHALF OF RENNE SLOAN
HOLTZMAN SAKAI LLP**

1 I, Steve Cikes, declare:

2 1. I am Senior Counsel with the law firm of Renne Sloan Holtzman Sakai LLP
3 (“Renne Sloan”), 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 governmental subclass representatives the City of
8 Palo Alto and the City of Richmond and as counsel for IPPs throughout the course of this
9 litigation. The background and experience of Renne Sloan and its attorneys are summarized in the
10 curriculum vitae attached hereto as **Exhibit A**.

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

15 4. During the pendency of the litigation, Renne Sloan performed the following work:
16 (a) conferring with Lead Counsel concerning issues related to the governmental subclass; (b)
17 review and drafting of pleadings related to the governmental subclass; (c) conferring with
18 representatives from the City of Palo Alto and the City of Richmond concerning case
19 developments and discovery-related issues, including the development and implementation of
20 document retention protocols; (d) preparing responses on behalf of the City of Palo Alto and the
21 City of Richmond to Defendants’ written discovery; (e) assisting in the collection, review, and
22 production of documents by the City of Palo Alto and the City of Richmond in response to
23 Defendants’ discovery demands; and (f) preparing for and attending Defendants’ FRCP 30(b)(6)
24 depositions of the City of Palo Alto and the City of Richmond.

25 5. Attached hereto as **Exhibit B** is a billing summary of Renne Sloan’s total hours and
26 lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for
27 Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead

1 counsel. See Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by
2 Renne Sloan during this period of time was 284.90, with a corresponding lodestar based on current
3 rates of \$123,629.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead
4 Counsel, and was performed by professional staff at my law firm. This summary was prepared
5 from contemporaneous, daily time records regularly prepared and maintained by Renne Sloan.

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

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

11 8. Attached hereto as **Exhibit E** is a summary of the expenses Renne Sloan has
12 incurred during the course of this litigation. Renne Sloan expended a total of \$516.53 in
13 unreimbursed costs and expenses in connection with the prosecution of this case. These expenses
14 were incurred on behalf of IPPs by Renne Sloan on a contingent basis and have not been
15 reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts,
16 and bank records, and thus represent an accurate recordation of the expenses incurred.

17 9. I have reviewed the time and expenses reported by Renne Sloan in this case which
18 are included in this declaration, and I affirm that they are true and accurate.

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

22 Executed on May 24, 2017 at San Francisco, California.

23
24 */s/ Steve Cikes*

25 _____
Steve Cikes

EXHIBIT A



RENNE SLOAN HOLTZMAN SAKAI LLP, PUBLIC LAW GROUP

Renne Sloan Holtzman Sakai LLP was founded by Louise Renne and Jonathan Holtzman in 2002. Prior to founding the firm, Louise Renne served as the elected City Attorney of the City and County of San Francisco from 1986-2002. Ms. Renne built the City Attorney’s Office into a widely respected public law firm with more than 200 lawyers practicing in virtually every area of civil law, with an annual budget of \$35 million. Widely known for having “reinvented” municipal law by filing class actions against tobacco, insurance companies, energy producers, national banks, gun and lead paint manufacturers and escrow companies, Ms. Renne has recovered over \$1 billion for California taxpayers. Ms. Renne was instrumental in assembling large coalitions of public agencies to pursue these public interest cases and achieved national recognition for their successful resolutions. Ms. Renne’s approach to affirmative litigation has provided a national model for modernizing the traditionally defense-oriented practice of public sector law and has broken ground in affirmative litigation on behalf of public agencies. Some examples of the cases brought by Ms. Renne while City Attorney include:

- Represented cities and counties throughout California in lawsuits against the tobacco industry to recover damages incurred to local and state government. The lawsuits, later joined by the California Attorney General, recovered \$25 billion, half of which now goes to California local government agencies. San Francisco’s share of the recovery is estimated to be \$585 million over 25 years.
- Represented over 300 California cities and counties in a false claims act whistleblower lawsuit against Bank of America. The lawsuit argued that proceeds from as many as 14,000 bond issues valued at \$100 billion and managed by the bank since the 1940s had been illegally retained by the bank. Local governments recovered \$187.5 million in this lawsuit.
- Represented public agencies in a \$50 million lawsuit against Old Republic Title, alleging that the company engaged in a scheme to collect illegal interest payments on escrow accounts. Subsequently, Department of Insurance initiated an investigation and the State Controller filed suit. The suit ultimately recovered \$8 million for the City and County of San Francisco.
- While serving as General Counsel for the San Francisco Unified School District (“SFUSD”), uncovered a nation-wide scandal, known as the “e-rate” scandal, in which numerous technology vendors and computer consultants conspired to defraud a federal government program of millions of dollars intended for the purchase of computer equipment for public schools. As part of a settlement with one company, a total of almost \$16 million was paid to the federal government, of which SFUSD received \$3.3 million.



- Represented California cities and counties in a lawsuit which successfully prevented tobacco companies from targeting minors in advertising. The lawsuit, often referred to as the “Joe Camel” case, resulted in a settlement in which Camel agreed to cease advertising directed at minors.
- In a case against a Fortune 250 company on behalf of SFUSD, recovered \$43.1 million for SFUSD in a breach of contract and false claims lawsuit.

Renne Sloan has grown over the last few years to include approximately 37 lawyers, and over 50 total staff, and frequently partners with other law firms in affirmative litigation cases. Roughly one quarter of the lawyers in the firm work on affirmative litigation; the firm has represented multiple public entities and individuals in class actions within California and across the United States relating to insurance broking and elder financial abuse.



LOUISE H. RENNE

Louise H. Renne is the founding partner of Renne Sloan Holtzman & Sakai, Public Law Group, LLP. Prior to founding the Public Law Group, she served as San Francisco City Attorney, an elective office, from 1986 to 2002, when she chose not to seek a fifth term.

Her current cases include a shareholder derivative action against Wells Fargo's officers and directors challenging a colossal scheme of illegal sales practices that deceived thousands of the Bank's own customers and was the subject of was the subject of regulatory proceedings brought by the Consumer Financial Protection Bureau and the U.S. Office of the Comptroller of Currency. Ms. Renne also represents the Cities of Palo Alto and Richmond, leading a municipal subclass in an antitrust action against Japanese and Korean manufacturers of lithium ion battery cells, and their American subsidiaries.

Ms. Renne is known in legal and government circles for transforming the traditionally defense-oriented practice of municipal law by pioneering an affirmative litigation program that won significant victories for cities and counties in California.

In what one newspaper termed "Renne's Revolution," she organized multiparty consumer protection lawsuits on behalf of local government and non-profit plaintiffs to reform unfair business practices by energy producers, tobacco companies, national banks, gun manufacturers, auto insurers and escrow companies.

Ms. Renne was appointed City Attorney by Mayor Dianne Feinstein in 1986 to fill the unexpired term of her predecessor, who died in office. She was subsequently elected to three full four-year terms.

Ms. Renne modernized the City Attorney's office, establishing it as a national leader in the practice of public law. She energized and streamlined its advice function, building widely respected legal expertise in every area of municipal operations ranging from traditional fields such as land use and public protection to the cutting-edge areas of energy regulation and telecommunications.

She created a vigorous and enterprising 200-lawyer city department of litigators, negotiators and regulatory attorneys, attracting top talent from private sector firms, law schools and judicial clerkships nationwide. Ms. Renne's new model of the public law firm attracted wide attention among city and county legal departments for recasting the municipal attorney in a more activist role as legal problem solver, inter-agency and community mediator, and neighborhood services provider.

Among Ms. Renne's improvements adopted by other cities and counties was the City Attorney's Code Enforcement Task Force, commended by the Ford Foundation and the Kennedy School of Government at Harvard University in 1991 for innovation in local government. Task force lawyers were assigned to meet regularly with residents in the



Louise Renne Bio
Page 2

city's neighborhoods, responding to complaints of code violations. They took legal action to close crack houses, clean up apartment house slums, ensure disability access, and enforce the health and safety laws.

Prior to becoming City Attorney, Ms. Renne was a member of the San Francisco Board of Supervisors from 1978 – 1986, where she was chair of the Finance Committee.

She was a California deputy attorney general from 1966 – 1977. She served in the environmental and criminal divisions, and argued on behalf of the state before the California and United States Supreme Courts.

She was in private practice from 1964 – 1966 and was a staff attorney in the general counsel's office at the Federal Communications Commission from 1961 – 1964.

She has been a member of the California Regional Water Quality Control Board and the Golden Gate Bridge District Board of Directors. She is a former president of California Women Lawyers, and is on the board of the San Francisco chapters of the American Cancer Society, Friends of the Children, and the PGA's First Tee program, as well as the boards of the San Francisco Fine Arts Museums and the Volunteers of Laguna Honda Hospital, the nation's largest publicly-run skilled nursing facility.

She is currently President of the San Francisco Police Commission and has served as the General Counsel for the San Francisco Unified School District.

Ms. Renne was raised in Pittsburgh, PA and attended college at Michigan State University. She earned her law degree at Columbia University in 1961.

Ms. Renne is well known and well respected nationally. She was named one of the State's top attorneys by California Lawyer Magazine in 1997 and has been consistently recognized as a Northern California Super Lawyer from 2004 to present. She is often called upon to testify before federal, state and other governmental bodies and is frequently asked to conduct impartial investigations for school, municipal and county governments.



Steve Cikes

Senior Counsel

EXPERIENCE

Mr. Cikes represents public agencies and non-profit organizations in a wide range of subjects, specializing in labor and employment matters. He also represents the firm's clients in public interest litigation. Mr. Cikes has extensive litigation experience, having handled a variety of complex cases before administrative tribunals and state and federal courts. Recently, he was instrumental in securing two important victories on behalf of the firm's clients in proceedings before the California Court of Appeal, both of which resulted in published appellate decisions.

RELATED EXPERIENCE

During law school, Mr. Cikes served as a judicial extern for United States District Court Judge William H. Alsup and as a law clerk for the United States Attorney's Office, Criminal Division in San Francisco.

REPRESENTATIVE PUBLISHED DECISIONS

- County of Sonoma v. Superior Court, 173 Cal. App. 4th 322 (2009)
- U.S. Western Falun Dafa Assn. v. Chinese Chamber of Commerce, 163 Cal. App. 4th 590 (2008)
- Martin v. City of Richmond, 504 F. Supp. 2d 766 (N.D. Cal. 2007)

SAN FRANCISCO OFFICE

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PRACTICE AREAS

Administrative Hearings & Arbitration

Appeals & Writ

Employment Law & Litigation

Government Law & Litigation

Labor Relations & Labor Law

Public Interest Litigation

BAR ADMISSION

California

EDUCATION

Golden Gate University,
School of Law, JD

University of San Francisco, BS

San Francisco State University, BA

EXHIBIT B

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

Firm Name: Renne Sloan Holtzman Sakai 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
Louise Renne (P)			2.00					0.30	0.50	0.50	4.90	0.40			8.60	\$650.00	\$5,590.00
Scott Dickey (P)								1.00	1.50		41.20				43.70	\$475.00	\$20,757.50
Scott Dickey (P)							1.60								1.60	\$350.00	\$560.00
Steve Cikes (P)			81.30		97.40	1.20		2.70	2.30	5.50	20.50	3.30			214.20	\$425.00	\$91,035.00
Steve Cikes (P)							14.00								14.00	\$350.00	\$4,900.00
Steven P. Shaw (OC)			1.00												1.00	\$400.00	\$400.00
Jessica Kenney (A)											1.80				1.80	\$215.00	\$387.00
															0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	84.30	0.00	97.40	1.20	15.60	4.00	4.30	6.00	68.40	3.70	0.00	0.00	284.90		\$123,629.50
NON-ATTORNEYS																	
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
															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	0.00	0.00	0.00	0.00	0.00		\$0.00
GRAND TOTAL:	0.00	0.00	84.30	0.00	97.40	1.20	15.60	4.00	4.30	6.00	68.40	3.70	0.00	0.00	284.90		\$123,629.50

EXHIBIT C

EXHIBIT D

(REDACTED)

Date	Attorney	Description	Category	Hourly Rate	Time	Amount
6/10/2013	Louise Renne (P)	[REDACTED]	11	650	0.50	325.00
6/28/2013	Steve Cikes (A)	Email exchange with team and call with S. Dickey regarding status of consolidated amended complaint and protective order and review documents (0.5); [REDACTED] regarding same (0.3)	9	425	0.80	340.00
6/28/2013	Scott Dickey (P)	Review stipulated protective order and [REDACTED]	9	475	0.80	380.00
7/1/2013	Steve Cikes (A)	[REDACTED] (0.5); review draft amended consolidated class action complaint and email exchange with L. Renne, L. Weaver and R. Green regarding same (1.0)	9	425	1.50	637.50
7/2/2013	Louise Renne (P)	Phone calls with co-counsel and lead counsel regarding amended class action complaint	11	650	0.30	195.00
7/2/2013	Steve Cikes (A)	Prepare for and participate in call with L. Renne, L. Weaver and R. Green regarding consolidated amended class action complaint (0.5); conference call with L. Renne, L. Weaver, R. Green and lead counsel representatives regarding same (0.3)	11	425	0.80	340.00
7/31/2013	Steve Cikes (A)	Confer with L. Weaver regarding client documents (0.3); prepare Palo Alto retention agreement and email exchange with L. Weaver and S. Dickey regarding same (0.7)	11	425	1.00	425.00
10/16/2013	Louise Renne (P)	Attention to e-mail regarding motion to dismiss	8	650	0.30	195.00
12/10/2013	Steve Cikes (A)	Prepare for and participate in conference call with L. Renne, S. Dickey, R. Green and L. Weaver regarding case status and discovery efforts (0.5); follow-up discussion with S. Dickey regarding same (0.5); [REDACTED] (1.0)	11	425	2.00	850.00
12/10/2013	Louise Renne (P)	Conference call with co-counsel	11	650	0.20	130.00
1/8/2014	Steve Cikes (A)	Call with L. Weaver and S. Dickey regarding discovery	11	425	1.00	425.00
1/14/2014	Scott Dickey (P)	[REDACTED]	11	475	0.60	285.00
1/16/2014	Steve Cikes (A)	Call with S. Dickey and L. Weaver regarding discovery	11	425	0.50	212.50
1/21/2014	Scott Dickey (P)	[REDACTED]	11	475	1.20	570.00

1/24/2014	Scott Dickey (P)	Meet with S. Cikes regarding discovery preparations	11	475	0.30	142.50
1/27/2014	Steve Cikes (A)	[REDACTED]	11	425	0.50	212.50
2/5/2014	Scott Dickey (P)	[REDACTED]	11	475	0.80	380.00
2/6/2014	Scott Dickey (P)	[REDACTED]	11	475	0.90	427.50
2/7/2014	Scott Dickey (P)	[REDACTED]	11	475	0.60	285.00
2/11/2014	Steve Cikes (A)	[REDACTED]	11	425	1.00	425.00
2/12/2014	Scott Dickey (P)	Telephone conference with L. Renne, S. Cikes and L. Weaver regarding strategy	11	475	0.80	380.00
2/12/2014	Steve Cikes (A)	[REDACTED] (2.5); participate in conference call with L. Renne, L. Weaver and S. Dickey regarding discovery issues and motion to dismiss briefing (0.7)	11	425	3.20	1,360.00
2/12/2014	Steve Cikes (A)	Confer with L. Weaver regarding motion to dismiss briefing dealing with public entity clients (0.5)	8	425	0.50	212.50
2/12/2014	Louise Renne (P)	Conference call with co-counsel regarding case strategy	11	650	0.80	520.00
2/26/2014	Scott Dickey (P)	Telephone conference with L. Renne and L. Weaver; attention to emails	11	475	0.70	332.50
2/26/2014	Steve Cikes (A)	[REDACTED] and conference call regarding Round 2 motion to dismiss briefing	11	425	1.50	637.50
3/4/2014	Steve Cikes (A)	[REDACTED]	11	425	2.00	850.00
3/5/2014	Steve Cikes (A)	[REDACTED]	11	425	2.50	1,062.50
3/6/2014	Scott Dickey (P)	[REDACTED]	11	475	0.30	142.50
3/6/2014	Steve Cikes (A)	[REDACTED]	11	425	0.50	212.50
3/14/2014	Scott Dickey (P)	Review and revise opposition to Motion to Dismiss	8	475	1.00	475.00

3/18/2014	Steve Cikes (A)	Review draft insert for motion to dismiss opposition on standing issue and S. Dickey's edits thereto (0.5); conduct legal research regarding same (1.5); email to L. Weaver regarding same (0.2)	8	425	2.20	935.00
4/1/2014	Scott Dickey (P)	[REDACTED]	11	475	0.50	237.50
4/7/2014	Scott Dickey (P)	Discuss discovery issues with S. Cikes	11	475	0.20	95.00
4/8/2014	Scott Dickey (P)	[REDACTED]	11	475	0.40	190.00
4/9/2014	Steve Cikes (A)	[REDACTED] (0.2)	11	425	0.20	85.00
4/14/2014	Scott Dickey (P)	[REDACTED] review Motion to Dismiss opposition; followup with Richmond, City College regarding records	11	475	3.50	1,662.50
4/25/2014	Steve Cikes (A)	[REDACTED] (2.0); [REDACTED] (1.0)	11	425	3.00	1,275.00
5/7/2014	Louise Renne (P)	Conference call with co-counsel regarding case status and motion to dismiss	11	650	0.50	325.00
5/7/2014	Steve Cikes (A)	Call with L. Renne and L. Weaver regarding case status and 5/9 motion to dismiss hearing	11	425	0.50	212.50
5/8/2014	Louise Renne (P)	Conference call with co-counsel regarding case status and motion to dismiss	11	650	0.30	195.00
5/8/2014	Steve Cikes (A)	Call with L. Renne and L. Weaver regarding case status and 5/9 motion to dismiss hearing (0.3)	11	425	0.30	127.50
5/13/2014	Scott Dickey (P)	[REDACTED]	11	475	0.60	285.00
5/15/2014	Scott Dickey (P)	[REDACTED]; strategize with S. Cikes, S. Shaw	11	475	1.00	475.00
5/16/2014	Scott Dickey (P)	[REDACTED]	11	475	1.30	617.50
5/19/2014	Scott Dickey (P)	Review documents from Richmond regarding purchases of covered products	7	350	0.20	70.00
6/16/2014	Scott Dickey (P)	Review documents from Richmond regarding purchases of covered products	7	350	1.40	490.00

7/14/2014	Scott Dickey (P)	Review discovery order and emails to L. Weaver	9	475	0.30	142.50
7/15/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding discovery issues	11	475	0.20	95.00
7/21/2014	Scott Dickey (P)	[REDACTED] (0.2); telephone call to L. Weaver regarding discovery (0.1); [REDACTED] [REDACTED] (0.8)	11	475	1.10	522.50
7/24/2014	Scott Dickey (P)	[REDACTED]	11	475	0.50	237.50
7/25/2014	Scott Dickey (P)	[REDACTED] (0.3); emails with L. Weaver regarding next steps (0.3)	11	475	0.60	285.00
8/29/2014	Scott Dickey (P)	Telephone conference with L. Renne and L. Weaver regarding discovery, motions to dismiss, and next steps	11	475	0.50	237.50
8/29/2014	Louise Renne (P)	Telephone conference with S. Dickey and L. Weaver regarding discovery, Motions to Dismiss, and next steps	11	650	0.50	325.00
9/11/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding Attorney General Call and custodian of record issues; attention to email	11	475	0.70	332.50
9/15/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding custodian issues related to relevant public entity purchase documents	11	475	0.30	142.50
9/16/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding discovery issues related to relevant public entity purchase documents	11	475	0.30	142.50
9/22/2014	Scott Dickey (P)	Prepare for and participate in teleconference with L. Weaver	11	475	0.60	285.00
9/23/2014	Scott Dickey (P)	Prepare for and participate in telephone conference with D. Landrinos and L. Weaver regarding custodian of records and electronically stored information	11	475	1.00	475.00
9/24/2014	Scott Dickey (P)	Telephone conference with L. Weaver and L. Renne regarding upcoming discovery needs (0.4); [REDACTED] [REDACTED] (0.4)	11	475	0.80	380.00
9/24/2014	Louise Renne (P)	Telephone conference with L. Weaver and S. Dickey regarding upcoming discovery needs	11	650	0.40	260.00
9/26/2014	Scott Dickey (P)	Per L. Renne, discuss Lithium batteries case and upcoming needs with J. Kenny	11	475	0.70	332.50
9/29/2014	Scott Dickey (P)	[REDACTED]	11	475	0.40	190.00

9/30/2014	Scott Dickey (P)	[REDACTED]	11	475	3.20	1,520.00
9/30/2014	J. Kenny (A)	[REDACTED]	11	215	0.30	64.50
9/30/2014	Louise Renne (P)	[REDACTED]	11	650	0.30	195.00
10/1/2014	J. Kenny (A)	[REDACTED]	11	215	1.50	322.50
10/1/2014	Scott Dickey (P)	[REDACTED] (0.5)	11	475	2.60	1,235.00
10/3/2014	Scott Dickey (P)	[REDACTED] (1.3); [REDACTED]	11	475	2.50	1,187.50
10/6/2014	Scott Dickey (P)	[REDACTED] (1.2)	11	475	2.50	1,187.50
10/7/2014	Scott Dickey (P)	[REDACTED] (3.0); [REDACTED] (0.4)	11	475	3.40	1,615.00
10/8/2014	Scott Dickey (P)	Finalize discovery letters and deliver to co-counsel	11	475	2.20	1,045.00
10/10/2014	Scott Dickey (P)	Revise and finalize discovery letters per co-counsel edits	11	475	0.50	237.50
11/10/2014	Scott Dickey (P)	Review pleadings and respond to email regarding joint stipulation and order	9	475	0.40	190.00
11/26/2014	Scott Dickey (P)	Review pleadings regarding discovery	11	475	1.00	475.00
12/5/2014	Scott Dickey (P)	Review proposed discovery plan; emails regarding same; draft revised discovery plan	11	475	0.80	380.00
12/8/2014	Scott Dickey (P)	Review discovery plan and discuss discovery strategy with L. Renne and L. Weaver	11	475	0.30	142.50
12/8/2014	Louise Renne (P)	Review discovery plan and discuss discovery strategy with S. Dickey and L. Weaver	11	650	0.30	195.00
12/9/2014	Scott Dickey (P)	Review proposed discovery plan; emails to L. Renne and L. Weaver regarding same; telephone conference with L. Weaver	11	475	0.80	380.00

3/31/2015	Louise Renne (P)	Attention to e-mail regarding potential conflict of interest issue	11	650	0.10	65.00
4/2/2015	Louise Renne (P)	Confer with S. Shaw regarding conflict waiver	11	650	0.10	65.00
4/3/2015	Louise Renne (P)	Attention to e-mail regarding conflict waiver	11	650	0.10	65.00
4/21/2015	Steve Cikes (A)	Review defendants' discovery to plaintiffs (0.5); conference call with L. Weaver and L. Renne regarding case status and discovery (0.3)	3	425	0.80	340.00
4/22/2015	Steve Cikes (A)	Prepare for and call with L. Weaver regarding discovery responses for government entity plaintiffs (0.5); conference call with L. Weaver and D. Lambrinos regarding same (1.0); follow-up call with L. Weaver regarding same (0.3)	3	425	1.80	765.00
4/23/2015	Steve Cikes (A)	Review master grid and document checklist from Cotchett firm and email from D. Lambrinos regarding same (0.5); review notes from Palo Alto client meeting regarding procurement procedures (0.5); [REDACTED] [REDACTED] (0.3)	3	425	1.30	552.50
4/24/2015	Steve Cikes (A)	Call with S. Dickey regarding Richmond documents responsive to Samsung Defendants' discovery	3	425	0.50	212.50
4/24/2015	Steve Cikes (A)	Locate and review Richmond documents	7	350	2.00	700.00
4/27/2015	Steve Shaw (A)	Confer with S. Cikes regarding strategy for responding to interrogatories and document requests	3	400	0.20	80.00
4/27/2015	Steve Cikes (A)	Review Richmond and Palo Alto emails and documents	7	350	2.00	700.00
4/27/2015	Steve Cikes (A)	[REDACTED] (0.5); email exchange with L. Weaver regarding same (0.3); prepare discovery responses (1.5)	3	425	2.30	977.50
4/28/2015	Steven Shaw (A)	Confer with S. Cikes regarding responses and objections to discovery requests to City of Richmond and City of Palo Alto (0.5); provide research concerning applicability of FRCP 33(d) in responding to interrogatories (0.3)	3	400	0.80	320.00

4/28/2015	Steve Cikes (A)	[REDACTED] (0.2); [REDACTED] (0.3); call with L. Weaver regarding discovery responses (0.2); [REDACTED] [REDACTED] [REDACTED] s (0.5); [REDACTED] (0.3); prepare discovery responses (3.0)	3	425	4.50	1,912.50
4/29/2015	Louise Renne (P)	Attention to e-mail regarding discovery	3	650	0.50	325.00
4/29/2015	Steve Cikes (A)	Email exchange with L. Weaver and L. Renne regarding Richmond and Palo Alto discovery responses (0.5); review D. Lambrinos' email regarding discovery response templates (0.7)	3	425	1.20	510.00
4/30/2015	Steve Cikes (A)	[REDACTED] [REDACTED]	3	425	0.30	127.50
5/4/2015	Louise Renne (P)	Confer with S. Cikes regarding discovery	3	650	0.50	325.00
5/4/2015	Steve Cikes (A)	Confer with L. Renne regarding Richmond and Palo Alto discovery responses (0.5); email exchange with L. Weaver regarding same (0.3); [REDACTED] (0.5)	3	425	1.30	552.50
5/5/2015	Steve Cikes (A)	Review draft Richmond and Palo Alto discovery responses and email exchange with L. Weaver regarding same (0.5); call with D. Lambrinos regarding same (0.2); edit and revise Richmond and Palo Alto discovery responses (4.0)	3	425	4.70	1,997.50
5/6/2015	Steve Cikes (A)	Review L. Weaver's edits to Richmond and Palo Alto discovery responses and email exchange with L. Weaver regarding same (0.5); prepare additional edits and revisions to Richmond and Palo Alto discovery responses (1.0); [REDACTED] [REDACTED] (0.5); [REDACTED] [REDACTED] (1.3)	3	425	3.30	1,402.50

5/7/2015	Steve Cikes (A)	Prepare for and attend meeting with L. Weaver [REDACTED] [REDACTED] regarding Richmond discovery responses and document production (2.5); edit and revise Richmond interrogatory responses and email exchange with L. Weaver regarding same (1.0)	3	425	3.50	1,487.50
5/11/2015	Louise Renne (P)	Attention to e-mail regarding court order	9	650	0.50	325.00
5/13/2015	Steve Cikes (A)	[REDACTED] (0.2); email exchange with L. Weaver regarding same (0.3)	3	425	0.50	212.50
5/14/2015	Steve Cikes (A)	Edit and revise Richmond interrogatory responses and [REDACTED] (1.0); edit and revise Palo Alto interrogatory responses and [REDACTED] (0.6); email exchange with L. Weaver and D. Lambrinos regarding need for extension on Palo Alto discovery responses (0.5)	3	425	2.10	892.50
5/15/2015	Steve Cikes (A)	Email exchange with L. Weaver and [REDACTED] regarding meeting to dismiss Palo Alto discovery responses and document production (0.5); prepare for Palo Alto meeting (1.5)	3	425	2.00	850.00
5/18/2015	Steve Cikes (A)	[REDACTED] (3.5)	3	425	3.50	1,487.50
5/19/2015	Steve Cikes (A)	Prepare notes from [REDACTED] regarding Palo Alto discovery responses and document production (1.5); email exchange with L. Weaver and [REDACTED] regarding same (0.2)	3	425	1.70	722.50
5/19/2015	Steve Cikes (A)	Review Palo Alto document production to date (1.0)	7	350	1.00	350.00
5/20/2015	Steve Cikes (A)	[REDACTED] (0.3); email exchange with L. Weaver and [REDACTED] regarding same (0.2); edit and revise Palo Alto interrogatory responses and [REDACTED] (1.0)	3	425	1.50	637.50
5/21/2015	Steve Cikes (A)	Conference call with L. Weaver and [REDACTED] regarding Palo Alto discovery responses and document production (0.5)	3	425	0.50	212.50

5/21/2015	Steve Cikes (A)	Review additional documents from Palo Alto	7	350	1.00	350.00
5/26/2015	Steve Cikes (A)	Prepare Palo Alto document production and email exchange with L. Weaver regarding same (1.5); [REDACTED] [REDACTED] (0.2); [REDACTED] [REDACTED] (0.3); edit and revise Palo Alto interrogatory responses and [REDACTED] [REDACTED] (0.5)	3	425	2.50	1,062.50
5/27/2015	Steve Cikes (A)	Conference call with L. Weaver and D. Lambrinos regarding Richmond and Palo Alto discovery responses (1.0)	3	425	1.00	425.00
5/27/2015	Steve Cikes (A)	Review additional document production from Richmond and email exchange with L. Weaver regarding same (0.5)	7	350	0.50	175.00
5/28/2015	Steve Cikes (A)	Review completed Palo Alto document production and email exchange with L. Weaver regarding same (1.0)	7	350	1.00	350.00
5/28/2015	Steve Cikes (A)	[REDACTED] [REDACTED] (0.5); [REDACTED] [REDACTED] (0.2); [REDACTED] [REDACTED] (0.2); [REDACTED] [REDACTED] (0.3); [REDACTED] [REDACTED] (0.3)	3	425	1.50	637.50
5/29/2015	Steve Cikes (A)	Review and finalize initial Palo Alto document production and email exchange with L. Weaver regarding same (1.5)	7	350	1.50	525.00
5/29/2015	Steve Cikes (A)	[REDACTED] [REDACTED] (0.2)	3	425	0.20	85.00
6/1/2015	Steve Cikes (A)	Finalize Palo Alto interrogatory responses and document production and email exchange with L. Weaver regarding same	3	425	1.50	637.50
6/2/2015	Steve Cikes (A)	Email exchanges with L. Weaver regarding miscellaneous discovery issues for Palo Alto and Richmond (0.3); email exchanges with L. Weaver and [REDACTED] regarding Richmond discovery responses (0.3)	3	425	0.60	255.00

6/3/2015	Steve Cikes (A)	[REDACTED]	3	425	3.00	1,275.00
6/4/2015	Steve Cikes (A)	Email exchange with L. Weaver regarding scope of Richmond and Palo Alto document production (0.3); [REDACTED] (0.2)	3	425	0.50	212.50
6/8/2015	Steve Cikes (A)	Email exchange with L. Weaver and Richmond and Palo Alto clients regarding email search terms (0.5); draft letter to defendants regarding same (0.5)	6	425	1.00	425.00
6/9/2015	Steve Cikes (A)	Call with L. Weaver regarding Richmond and Palo Alto discovery responses and document production and email exchange regarding same	3	425	0.50	212.50
6/11/2015	Steve Cikes (A)	Review responses to defendants' second set of interrogatories and email exchange with L. Weaver regarding same (0.5); email exchange with L. Weaver and [REDACTED] regarding discovery responses and document collection for Palo Alto (0.3)	3	425	0.80	340.00
6/16/2015	Steve Cikes (A)	[REDACTED] (0.2); [REDACTED] (0.5)	3	425	0.70	297.50
6/17/2015	Steve Cikes (A)	[REDACTED]	3	425	3.00	1,275.00
6/18/2014	Steve Cikes (A)	[REDACTED] (0.3); review photographs from [REDACTED] (0.2)	3	425	0.50	212.50
6/19/2015	Steve Cikes (A)	[REDACTED]	3	425	0.30	127.50
6/22/2015	Louise Renne (P)	Confer with S. Cikes regarding case status and meeting with co-counsel	11	650	0.50	325.00
7/10/2015	Steve Cikes (A)	Call with L. Weaver regarding Palo Alto and Richmond supplemental document production	3	425	0.50	212.50

7/21/2015	Steve Cikes (A)	[REDACTED] (0.3); [REDACTED] (0.5)	3	425	0.80	340.00
7/23/2015	Steve Cikes (A)	Review supplemental document production from Palo Alto and email exchange with L. Weaver regarding same	3	425	1.00	425.00
9/15/2015	Steve Cikes (A)	Draft emails to Richmond and Palo Alto regarding Toshiba Defendants' supplemental discovery requests	3	425	0.50	212.50
9/29/2015	Steve Cikes (A)	[REDACTED] (0.5); [REDACTED] (0.3); draft discovery responses for Palo Alto and Richmond (0.6)	3	425	1.40	595.00
9/29/2015	Steve Cikes (A)	Review Palo Alto documents regarding same (1.0);	7	350	1.00	350.00
9/30/2015	Steve Cikes (A)	Review Palo Alto documents responsive to Toshiba Defendants' supplemental discovery responses (1.0)	7	350	1.00	350.00
9/30/2015	Steve Cikes (A)	Email to D. Lamborios from Cotchett with Richmond and Palo Alto supplemental discovery responses (0.3)	3	425	0.30	127.50
10/12/2015	Steve Cikes (A)	Review Palo Alto and Richmond documents responsive to Toshiba defendants' supplemental discovery request (2.0)	7	350	2.00	700.00
10/12/2015	Steve Cikes (A)	Review 10/12 letter from D. Lambrinos to Defendants' counsel regarding class representative discovery issues and follow-up email exchange with L. Weaver regarding same (0.3)	3	425	0.30	127.50
10/13/2015	Steve Cikes (A)	Review Palo Alto and Richmond documents responsive to Toshiba defendants' supplemental discovery requests (1.0);	7	350	1.00	350.00
10/13/2015	Steve Cikes (A)	Email exchange and follow-up call with L. Weaver regarding same (0.5)	3	425	0.50	212.50
10/14/2015	Steve Cikes (A)	Prepare Palo Alto and Richmond document production in response to Toshiba defendants' supplemental discovery requests and confer with L. Weaver regarding same	3	425	2.00	850.00

12/21/2015	Steve Cikes (A)	Review email from D. Lambrinos regarding potential deposition dates for Richmond and Palo Alto and email exchange with L. Weaver regarding same	5	425	0.50	212.50
1/4/2016	Steve Cikes (A)	Attention to emails regarding discovery issues	5	425	0.50	212.50
1/6/2016	Steve Cikes (A)	Review draft deposition notices for Palo Alto and Richmond (0.8); email exchange with L. Weaver regarding same (0.2)	5	425	1.00	425.00
1/8/2016	Steve Cikes (A)	Call with L. Weaver regarding Palo Alto and Richmond depositions (0.3); [REDACTED] (0.3)	5	425	0.60	255.00
1/11/2016	Steve Cikes (A)	[REDACTED] (0.3)	5	425	0.30	127.50
1/11/2016	Steve Cikes (A)	Email exchange with D. Lambrinos regarding discovery verifications for Palo Alto and Richmond (0.2)	3	425	0.20	85.00
1/13/2016	Steve Cikes (A)	Calls with L. Weaver and Defendants' counsel regarding Richmond and Palo Alto depositions (0.5); [REDACTED] (0.5)	5	425	1.00	425.00
1/14/2016	Steve Cikes (A)	Calls with L. Weaver regarding Richmond and Palo Alto depositions (0.3); [REDACTED] (0.3)	5	425	0.60	255.00
1/14/2016	Steve Cikes (A)	Review draft letter to Defendants' counsel regarding Richmond and Palo Alto depositions and email exchange with L. Weaver regarding same (0.2);	6	425	0.20	85.00
1/15/2016	Steve Cikes (A)	[REDACTED]	5	425	0.20	85.00
1/20/2016	Steve Cikes (A)	Attention to emails regarding Palo Alto and Richmond depositions and email exchange with L. Weaver regarding same	5	425	1.00	425.00
1/22/2016	Steve Cikes (A)	Email exchange with L. Weaver regarding Palo Alto and Richmond depositions	5	425	0.30	127.50
1/26/2016	Louise Renne (P)	Attention to e-mail regarding class certification	10	650	0.50	325.00
2/5/2016	Steve Cikes (A)	Attention to emails regarding Richmond and Palo Alto depositions	5	425	0.50	212.50
2/19/2016	Steve Cikes (A)	Attention to emails regarding Richmond and Palo Alto discovery responses (0.3)	3	425	0.30	127.50
2/19/2016	Steve Cikes (A)	Review, edit and revise objections to Palo Alto deposition notice (1.0)	5	425	1.00	425.00

2/22/2016	Steve Cikes (A)	Attention to emails regarding Richmond deposition	5	425	0.30	127.50
2/24/2016	Steve Cikes (A)	Attention to emails regarding Richmond and Palo Alto depositions (0.5); review, edit and revise objections to Palo Alto deposition notice (1.0)	5	425	1.50	637.50
2/26/2016	Steve Cikes (A)	Attention to emails regarding Richmond deposition	5	425	0.50	212.50
3/1/2016	Steve Cikes (A)	Confer with L. Weaver and regarding Richmond and Palo Alto depositions and email exchange regarding same (0.5); [REDACTED] (0.5); review online docket in preparation for Richmond and Palo Alto depositions (2.0)	5	425	3.00	1,275.00
3/2/2016	Steve Cikes (A)	Review, edit and revise draft objections to Palo Alto deposition notice (1.0); review Palo Alto document production in preparation for upcoming Richmond deposition (3.0); email exchange with L. Weaver and Richmond and Palo Alto regarding deposition prep meetings (0.3)	5	425	4.30	1,827.50
3/3/2016	Steve Cikes (A)	Review K. Kauble Pachman from Susman Godfrey's edits to Palo Alto deposition notice objections (0.5); attention to email exchange between L. Weaver and K. Kauble Pachman regarding Richmond and Palo Alto depositions (0.2); review Palo Alto document production and prepare notes for Palo Alto deposition prep meeting (3.0)	5	425	3.70	1,572.50
3/4/2016	Steve Cikes (A)	Review Block and Levinson analysis of Richmond and Palo Alto document production (1.0); [REDACTED] (2.0); [REDACTED] (1.5); [REDACTED] (0.3); review miscellaneous tolling agreements and filings sent by K. Kauble Pachman regarding status of products at issue in the case (1.0); email exchange with L. Weaver regarding Richmond document production (0.2)	5	425	6.00	2,550.00

3/7/2016	Steve Cikes (A)	Review draft deposition prep outline prepared by K. Kauble Pachman from Susman Godfrey (1.0); email exchange with L. Weaver regarding same	5	425	1.20	510.00
3/13/2016	Steve Cikes (A)	Prepare for Palo Alto deposition meeting	5	425	5.00	2,125.00
3/14/2016	Steve Cikes (A)	[REDACTED] (1.0); [REDACTED] (3.5); [REDACTED] (1.0)	5	425	5.50	2,337.50
3/14/2016	Steve Cikes (A)	Review First Amended Responses to Defendants' First Set of Requests for Production of Documents and First Amended Responses to Toshiba's First Set of Requests for Production of Documents and emails to Richmond and Palo Alto regarding same (1.0)	3	425	1.00	425.00
3/15/2016	Steve Cikes (A)	[REDACTED] (0.3); calls and email exchange with L. Weaver regarding same (0.5); email exchange with D. Lambrinos regarding Palo Alto and Richmond verifications (0.3); [REDACTED] (1.0)	3	425	2.10	892.50
3/21/2016	Steve Cikes (A)	[REDACTED] (3.5); [REDACTED] (0.5); [REDACTED] (3.5); [REDACTED] (0.5)	5	425	8.00	3,400.00
3/22/2016	Steve Cikes (A)	Review Richmond document production and email exchanges regarding same for Richmond deposition (1.0); review additional Richmond documents responsive to Defendants' discovery requests and email exchange with L. Weaver regarding same (1.0)	5	425	2.00	850.00

3/23/2016	Steve Cikes (A)	Review "hot docs" from D. Lambrinos in preparation for Richmond and Palo Alto depositions (1.5); review additional Palo Alto documents (1.0); [REDACTED] (0.5)	5	425	3.00	1,275.00
3/24/2016	Steve Cikes (A)	[REDACTED] (0.5); [REDACTED] (2.0); [REDACTED] (0.5)	5	425	5.00	2,125.00
3/25/2016	Steve Cikes (A)	Travel to Richmond (0.5): attend Richmond deposition (8.0); return travel to San Francisco (0.5)	5	425	9.00	3,825.00
3/28/2016	Steve Cikes (A)	Review objections to amended Palo Alto deposition notice and email exchange with L. Weaver regarding same	5	425	1.00	425.00
3/29/2016	Steve Cikes (A)	Attention to emails regarding class certification motion as it pertains to indirect purchaser, public entity plaintiffs	10	425	0.30	127.50
3/31/2016	Steve Cikes (A)	[REDACTED]	5	425	2.50	1,062.50
4/1/2016	Steve Cikes (A)	[REDACTED] (2.0); [REDACTED] (1.0); [REDACTED] (3.0); [REDACTED] (1.0)	5	425	7.00	2,975.00
4/4/2016	Steve Cikes (A)	Review Sony settlement information for Palo Alto deposition prep	5	425	1.00	425.00
4/5/2016	Steve Cikes (A)	Review Defendants' 3rd Interrogatories and 2nd Requests for Production of Documents to Indirect Purchaser Plaintiffs (0.5); [REDACTED] (0.3); call with L. Weaver regarding written discovery follow-up and Palo Alto deposition (0.5); [REDACTED] (0.3); review previously produced Palo Alto emails for production in native format for discovery response and email exchange with L. Weaver regarding (1.0)	3	425	2.60	1,105.00

4/6/2016	Steve Cikes (A)	Review previously produced Palo Alto emails [REDACTED] in native format [REDACTED] emails for Palo Alto deposition and email exchange with L. Weaver regarding same	5	425	1.00	425.00
4/7/2016	Steve Cikes (A)	[REDACTED] [REDACTED] (0.8); follow-up call with L. Weaver regarding same (0.2)	3	425	1.00	425.00
4/8/2016	Steve Cikes (A)	[REDACTED] (0.3)	3	425	0.30	127.50
4/8/2016	Steve Cikes (A)	[REDACTED] (0.2)	5	425	0.20	85.00
4/12/2016	Steve Cikes (A)	[REDACTED] (0.3); review co-lead's draft responses to Defendants' Request for Production of Documents to IPPs (Set Two) (0.5); email to Richmond and Palo Alto regarding same (0.5)	3	425	1.30	552.50
4/13/2016	Steve Cikes (A)	Review co-lead's draft responses to Defendants' Interrogatories to IPPs (Set Three) and email to L. Weaver regarding same	3	425	1.00	425.00
4/15/2016	Steve Cikes (A)	Call with M. Desai regarding Palo Alto deposition and follow up email exchange regarding same (0.5); call with L. Weaver regarding Palo Alto deposition (0.2)	5	425	0.70	297.50
4/17/2016	Steve Cikes (A)	[REDACTED]	5	425	1.50	637.50
4/18/2016	Steve Cikes (A)	[REDACTED] (1.0); [REDACTED] (3.0); [REDACTED] (0.5)	5	425	5.50	2,337.50
4/20/2016	Steve Cikes (A)	Email exchange with L. Weaver and opposing counsel regarding rescheduling Palo Alto deposition	5	425	0.50	212.50
4/27/2016	Louise Renne (P)	Confer with S. Cikes regarding discovery issues	3	650	0.50	325.00
4/27/2016	Steve Cikes (A)	Confer with L. Renne regarding Richmond and Palo Alto discovery issues	3	425	0.50	212.50

5/1/2016	Steve Cikes (A)	[REDACTED]	3	425	0.20	85.00
5/3/2016	Steve Cikes (A)	Travel to Palo Alto for deposition (1.0); prepare for and attend Palo Alto deposition (9.0); return travel to San Francisco (1.0)	5	425	11.00	4,675.00
5/3/2016	Steve Cikes (A)	[REDACTED]	3	425	0.70	297.50
5/4/2016	Steve Cikes (A)	[REDACTED]	3	425	1.00	425.00
5/5/2016	Steve Cikes (A)	[REDACTED] (0.5); [REDACTED] (1.0); [REDACTED] (0.3); [REDACTED] (0.5)	3	425	2.30	977.50
5/6/2016	Steve Cikes (A)	[REDACTED] (0.2); [REDACTED] (0.6)	3	425	0.80	340.00
5/13/2016	Louise Renne (P)	Attention to e-mail regarding discovery	3	650	0.50	325.00
5/13/2016	Steve Cikes (A)	[REDACTED]	3	425	0.50	212.50
5/16/2016	Steve Cikes (A)	Email exchange with M. Desai regarding Palo Alto document production and discovery responses and review documents/emails regarding same (1.0); [REDACTED] (0.3)	3	425	1.30	552.50
5/17/2016	Steve Cikes (A)	Email exchange with L. Weaver and M. Desai regarding Richmond discovery responses (0.5); review draft Palo Alto and Richmond discovery responses and further email exchange with L. Weaver and M. Desai regarding same (0.5)	3	425	1.00	425.00

5/18/2016	Steve Cikes (A)	Attention to emails regarding Palo Alto discovery responses	3	425	0.50	212.50
5/19/2016	Steve Cikes (A)	Attention to emails regarding Richmond document production and review Richmond document production regarding same	3	425	0.50	212.50
6/17/2016	Steve Cikes (A)	Review IPP class certification opposition (2.0); prepare for and participate in conference call with S. Williams, D. Lambrinos and L. Williams regarding IPP class certification reply with regard to public entity subclass (0.5); follow up call with L. Weaver regarding same (0.2)	10	425	2.70	1,147.50
7/15/2016	Steve Cikes (A)	Attention to emails regarding deposition of defendants' expert on public entity plaintiffs, conduct review of Palo Alto's document production and deposition transcripts and email exchange with D. Lambrinos regarding same	10	425	1.00	425.00
7/18/2016	Steve Cikes (A)	Attention to emails regarding deposition of defendants' expert with regard to public entity plaintiffs	10	425	0.50	212.50
7/19/2016	Steve Cikes (A)	Attention to emails regarding deposition of defendants' expert on public entity plaintiffs, including review of talking points developed by M. Desai	10	425	0.50	212.50
7/22/2016	Steve Cikes (A)	Attention to emails regarding additional requests for information for Palo Alto relevant to class certification of public entity plaintiff subclass	10	425	0.50	212.50
7/29/2016	Steve Cikes (A)	Attention to emails regarding additional information needed from Palo Alto related to class certification of public entity plaintiff subclass and calls and email exchange with M. Desai and Palo Alto clients regarding same	3	425	1.00	425.00
11/29/2016	Louise Renne (P)	Confer with L. Weaver and S. Cikes regarding LG Chem settlement; attention to e-mail	12	650	0.20	130.00
11/29/2016	Steve Cikes (A)	Confer with L. Weaver and L. Renne regarding LG Chem settlement (0.2); review email from co-leads and settlement agreement regarding same (0.5); email to client regarding same (0.3)	12	425	0.50	212.50
12/16/2016	Steve Cikes (A)	Review email and draft settlement agreement from D. Lambrinos regarding Hitachi and Maxwell settlement	12	425	0.50	212.50

12/19/2016	Steve Cikes (A)	Confer with L. Weaver regarding Hitachi and Maxwell settlement (0.3); prepare email to Richmond and Palo Alto regarding same (0.5)	12	425	0.80	340.00
1/4/2017	Louise Renne	Attention to e-mail regarding NEC settlement	12	650	0.20	130.00
1/18/2017	Steve Cikes (A)	Review draft settlement agreement with NEC Corporation and email exchange with L. Weaver regarding same (1.0); email to Richmond and Palo Alto regarding same (0.5)	12	425	1.50	637.50
					284.90	123,629.50

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
RENNE SLOAN HOLZMAN SAKAI 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	\$516.53
Miscellaneous	
TOTAL:	\$516.53