

# **EXHIBIT 40**

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 JON A. TOSTRUD  
IN SUPPORT OF INDIRECT  
PURCHASER PLAINTIFFS' MOTION  
FOR AN AWARD OF ATTORNEYS'  
FEES AND REIMBURSEMENT OF  
EXPENSES ON BEHALF OF TOSTRUD  
LAW GROUP, P.C.**

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**This Document Relates to:**

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**ALL INDIRECT PURCHASER ACTIONS**

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1 I, Jon A. Tostrud, declare:

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

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

10 3. TLG 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 TLG 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, TLG performed the following work: (a)  
15 communicating directly with named plaintiff Laura Gallardo and evaluating her viability as a  
16 representative plaintiff for the consolidated complaint; (b) providing information directly to and  
17 soliciting advice and input from the named plaintiff Laura Gallardo regarding important  
18 developments in the case, including indictments of the defendants; (c) at lead counsel’s direction,  
19 conferring with co-counsel regarding discovery projects for named plaintiff Laura Gallardo; and  
20 (d) drafting and reviewing discovery responses, including gathering and evaluating documents,  
21 with and for named plaintiff Laura Gallardo. Additionally, TLG engaged in several internal  
22 conferences with co-counsel to ensure that these discovery projects and the evaluation of named  
23 plaintiff Laura Gallardo occurred in a seamless and efficient manner.

24 5. Attached hereto as **Exhibit B** is a billing summary of TLG’s total hours and  
25 lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for  
26 Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead  
27 counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by TLG

1 during this period of time was 4.40, with a corresponding lodestar based on current rates of  
2 \$2,640.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and  
3 was performed by professional staff at my law firm. This summary was prepared from  
4 contemporaneous, daily time records regularly prepared and maintained by TLG.

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

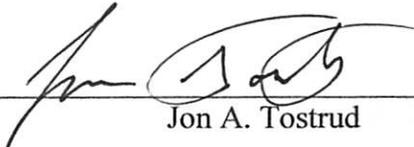
7 7. Attached hereto as Exhibit D is a compilation of my firm's detailed records at  
8 historical billing rates. The entries in Exhibit D have been redacted per the Court's Order in ECF  
9 No. 1803.

10 8. Attached hereto as Exhibit E is a summary of the expenses TLG has incurred  
11 during the course of this litigation. TLG expended a total of \$2,593.70 in unreimbursed costs and  
12 expenses in connection with the prosecution of this case. These expenses were incurred on behalf  
13 of IPPs by TLG on a contingent basis and have not been reimbursed. The expenses reflected in  
14 Exhibit E were prepared from expense vouchers, receipts, and bank records, and thus represent an  
15 accurate recordation of the expenses incurred.

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

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

21 Executed on May 23, 2017 at Los Angeles, California.

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28 Jon A. Tostrud



# **EXHIBIT A**



TOSTRUD LAW GROUP,  
P.C.  
1925 CENTURY PARK EAST  
SUITE 2125  
LOS ANGELES, CA 90067  
TEL: 310.278.2600  
FAX: 310.278.2640  
WWW.TOSTRUDLAW.COM

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## FIRM RESUME

Tostrud Law Group, P.C. was founded in 2012 with offices in Los Angeles and Minneapolis. We have a diversified legal practice, successfully representing plaintiffs in the areas of personal injury, securities and financial fraud, employment discrimination, unlawful employment practices including wage and hour disputes, product defect, consumer protection, antitrust and intellectual property, False Claims Act, and human rights. Our clients include individuals, classes or groups of persons, businesses, and public and private entities.

### FIRM BIOGRAPHY:

**JON A. TOSTRUD**, Admitted to practice in the State of California and the State of Minnesota; U.S. District Court, Eastern District of California, 1999; U.S. District Court, Southern District of California, 1999; U.S. District Court, Northern District of California, 1999; U.S. District Court, Central District of California, 1998; *Education*: William Mitchell College of Law (J.D., 1994); State Bar of California; State Bar of Minnesota. California Bar Association.

In addition, while with the firm of Cuneo Gilbert & LaDuca, LLP, Mr. Tostrud headed the wage and hour practice and was appointed lead or co-lead counsel and achieved seven-figure and eight-figure settlements in several class and collective actions including:

**Nerland v. Caribou Coffee, Inc. et al.**, Civil No. 05-1847 (United States District Court for the District of Minnesota). As co-lead class counsel, Cuneo Gilbert & LaDuca, LLP achieved a \$2.7 million settlement on behalf of retail store managers improperly classified as exempt from overtime. The class action suit first filed in

2005, charged Caribou with wrongfully denying overtime pay due to current and former Caribou store managers. The lawsuit contended that Caribou misclassified its Store Manager position as exempt under the Minnesota and Federal Fair Labor Standards Acts to avoid paying overtime compensation. After nearly three years of litigation, the parties entered into a Settlement whereby, the Court granted final approval and Caribou Coffee Co. compensated participating class members.

**Oliva, et al v. International Coffee and Tea. LLC d/b/a The Coffee Bean and Tea Leaf, et al.**, Case No. BC296435 (Superior Court of the State of California, County of Los Angeles). As co-lead class counsel, Cuneo Gilbert & LaDuca, LLP achieved a seven-figure settlement on behalf of retail store managers improperly classified as exempt from overtime, as well as hourly-paid barristas who were not compensated for their meal and rest breaks.

**Lagunas v. Cargill Meat Solutions Corp.**, Case No. 10-cv-00220 (United State District Court for the Southern District of Iowa) (Final approval - 1/27/11 Cuneo Gilbert & LaDuca, LLP served as co-lead counsel in six-figure class settlement on behalf of meat processing plant employees who were not properly paid for donning and doffing activities performed before their shifts, during meal breaks and after their shifts.

**Wineland, et al v. Casey's General Stores, Inc.**, No. 08 CV 00020 (United States District Court for the Southern District of Iowa) (Final approval 10/22/09). Cuneo Gilbert & LaDuca, LLP along with co-counsel was appointed lead counsel and achieved a seven figure settlement on behalf of a Section 216(b) collective class and Rule 23 class of over 60,000 cooks and cashiers for unpaid wages, including time worked before and after their scheduled shifts and while off-the-clock.

**Cedeno et al v. Home Mortgage Desk. Corp. et al.**, No. 08 CV 1168 (United States District Court for the Eastern District of New York) (Final approval -

6/15/10). Cuneo Gilbert & LaDuca, LLP along with co-counsel was appointed lead counsel and achieved a six figure settlement on behalf of a Section 216(b) collective class of loan officers deprived of overtime wages.

**Jones, et al v. Casey's General Stores, Inc.**, No. 07 CV 400 (United States District Court for the Southern District of Iowa) (Final approval - 10/22/09). Cuneo Gilbert & LaDuca, LLP along with co-counsel was appointed lead counsel and achieved a seven figure settlement on behalf of a Section 216(b) collective class and Rule 23 class of more than 6,000 assistant store managers for unpaid wages, including time worked before and after their scheduled shifts and while off-the-clock.

**ANTHONY M. CARTER**, Admitted to practice in the Commonwealth of Virginia. *Education:* James E. Rogers College of Law at the University of Arizona (J.D., 1995); State Bar of Virginia; Virginia Bar association.

#### **SETTLED CASES**

- a. **Struett v. Susquehanna**, No. 5:15-cv-176 (United States District Court for the Eastern District of Pennsylvania). Tostrud Law Group, P.C. helped secure a settlement on behalf of a Section 216(b) collective class and Rule 23 class of residential mortgage bankers for misclassification violations and failure to properly pay overtime wages.
- b. **Pomphrett, et al. v. American Home Bank, et al.**, No. 1:12-cv-10330 (United States District Court for the District of Massachusetts). Tostrud Law Group, P.C. helped achieve a seven figure settlement of behalf of a Section 216(b) collective class and Rule 23 class of several hundred former loan officers for the failure to pay overtime wages.
- c. **Wylor –Wittenberg, et al. v. Metlife Home Loans, Inc.**, No. 2:12-cv-00366 (United States District Court for the Eastern District of New York). Tostrud Law Group, P.C. helped achieve a seven figure settlement of behalf of a Section 216(b) collective class and Rule 23 class of current and former loan officers for the failure to pay overtime wages.

- d. **Ord, et al. v. First National Bank of Pennsylvania and F.N.B. Corp.**, No. 12-cv-00766 (United States District Court for the Western District of Pennsylvania). Tostrud Law Group, P.C. helped achieve a seven figure settlement of behalf of a Rule 23 class of several hundred account holders at First National Bank of Pennsylvania who were improperly charged overdraft fees on their checking accounts.
- e. **Molyneux, et al. v. Securitas Security Services, Inc.**, No. 4:10-cv-588 (United States District Court for the Southern District of Iowa). Tostrud Law Group, P.C. helped achieve a six figure settlement of behalf of a Section 216(b) collective class and Rule 23 class of hundreds of hourly paid security officers for failure to pay for off-the-clock work.
- f. **Hansen, et al v. Per Mar Security Services, et al**, No. 4:09-cv-00459 (United States District Court for the Southern District of Iowa). Tostrud Law Group, P.C. helped achieve a confidential settlement of behalf of a Section 216(b) collective class and Rule 23 class of hundreds of hourly paid security officers for back wages.

## **CASE PROFILES**

### **Current Cases**

- a. **Elmer Ramilo v. Open Care Medical Clinic**, No. 30-2017-00901399 (Superior Court of California, County of Orange). Tostrud Law Group, P.C. serves as co-counsel in a class action lawsuit and seeks to represent thousands of consumers who allege they received unauthorized text messages from Open Care Medical Clinic in violation of the Telephone Consumer Protection Act (“TCPA”). Plaintiffs seek an injunction requiring Open Care to cease all text message advertising activities, and an award of statutory damages to all class members.
- b. **Luis Bautista, et al. v. Carl Karcher Enterprises, LLC**, No. BC649777 (Superior Court of California, County of Los Angeles). Tostrud Law Group, PC. serves as co-counsel in a class action lawsuit and seeks to represent a nationwide class of employees who work for

Carl's Jr. restaurants. Plaintiffs allege that Carl's Jr.'s parent company, CKE, has colluded with its franchisees to suppress the wages of the restaurant-based managers through a "no hire" agreement that expressly forbids franchises from employing or seeking to employ any of the restaurant-based managers who work for other franchisees or for CKE directly. Plaintiffs seek class damages, restitution, and to permanently enjoin Defendants from enforcing the "no hire" term in its franchise agreement with franchisees.

- c. **Grahl v. Circle K Stores, Inc.**, No. 2:14-cv-305 (United States District Court for the District of Nevada). Tostrud Law Group, P.C., serves as co-counsel for a nationwide class of Store Managers employed by defendant Circle K Stores. Plaintiffs allege Circle K Stores knowingly misclassified its Store Managers as exempt employees and failed to properly pay them the required minimum and overtime wages. On August 26, 2015, the court granted Plaintiff's motion for conditional certification and agreed the case should proceed as a national class action. To date, more than 1,200 current and former store managers have joined the case seeking to recover back wages.
- d. **Suliaman v. Southwest Furniture**, No. 2:14-cv-1854 (United States District Court for the District of Nevada). Tostrud Law Group, P.C. serves as co-counsel and seeks to represent a class of sales associates employed by Southwest Furniture Stores d/b/a Ashley Furniture Stores. Plaintiffs allege defendant Ashley Furniture knowingly misclassified its inside sales associates as exempt employees and failed to properly pay them the required overtime wages. Tostrud Law Group is seeking compensatory damages for a class of sales associates who worked in defendant's Nevada retail stores.
- e. **Ardon v. City of Los Angeles**, No. BC363959 (Superior Court for the County of Los Angeles). Tostrud Law Group, P.C., along with co-counsel, represents millions of Los Angeles city residents and businesses who paid taxes for telephone services that were improperly collected by the city. In October 2016, the City of Los Angeles agreed to a \$92.5 million dollar settlement which would provide refunds of taxes collected for

telephone services on behalf of consumers who paid telephone utility user taxes to the City of Los Angeles for residential landline, business landline, and mobile telephone services.

- f. Rocha, et al. v. Gateway Funding**, No. 15-cv-00482 (United States District Court for the Eastern District of Pennsylvania). Tostrud Law Group, P.C. serves as co-counsel representing a nationwide class of inside sales loan officers who worked for defendant Gateway Funding. Plaintiff alleges Gateway Funding knowingly misclassified its inside loan officers as exempt employees and failed to properly pay them the required minimum and overtime wages. Plaintiff's motion to conditionally certify the class was granted on June 1, 2016, and Plaintiff's counsel is currently preparing to distribute notice to hundreds of putative class members. Tostrud Law Group is seeking compensatory damages for a nationwide class of inside sales loan officers.
- g. Lane v. First National Bank of Layton**, No. 01-15-0005-5682 (American Arbitration Association). Tostrud Law Group, P.C. serves as co-counsel seeking to represent a nationwide class of current and former inside sales loan officers for alleged violations of the Fair Labor Standards Act and Maryland state labor laws. Claimant alleges Layton knowingly misclassified its inside loan officers as exempt employees and failed to properly pay them the required minimum and overtime wages. On February 15, 2017, an arbitrator granted Claimant's Motion for Class Certification and ordered notice to be distributed to potential class members. Tostrud Law Group is seeking compensatory damages for a nationwide class of inside sales loan officers.
- h. Granados v. County of Los Angeles**, No. BC361470 (Superior Court for the County of Los Angeles). Tostrud Law Group, P.C., along with co-counsel, is seeking to represent a class of residents and businesses in the County of Los Angeles who paid taxes for telephone services that were improperly collected by the county. Tostrud Law Group, P.C. is seeking refunds of taxes collected for telephone services on behalf of consumers

who paid telephone utility user taxes collected by the County of Los Angeles for residential landline, business landline, and mobile telephone services.

- i. Gonzalez-Rodriguez v. Mariana’s Enterprises**, No. 2:15-cv-152 (United States District Court of the District of Nevada). Tostrud Law Group, P.C., serves as co-counsel seeking to represent a nationwide class of hourly employees of defendant Mariana’s Enterprises. Plaintiffs allege defendant failed to keep accurate time records for its employees and did not compensate plaintiffs properly for overtime hours worked in violation of the Fair Labor Standards Act. Tostrud Law Group is seeking compensatory damages and an injunction against defendant for its unlawful labor practices.
- j. Granados v. Pepsico, Inc.**, No. 14-cv-01917 (United States District Court for the Central District of California). Tostrud Law Group, P.C., along with co-counsel, represent consumers who allege Pepsico deceptively omits in its advertising and marketing that its Pepsi One soft drink contains dangerous levels of the impurity 4-MEI, or 4-Methylimidazole. Tostrud Law Group seeks to represent all California consumers who purchased Pepsi One and were exposed to the substantial health risks associated with 4-MEI.
- k. McWilliams v. City of Long Beach**, No. BC361469 (Superior Court for the County of Los Angeles). Tostrud Law Group, P.C., along with co-counsel, is seeking to represent a class of residents and businesses in the City of Long Beach who paid taxes for telephone services that were improperly collected by the city. Tostrud Law Group, P.C. is seeking refunds of taxes collected for telephone services on behalf of consumers who paid telephone utility user taxes collected by the City of Long Beach for residential landline, business landline, and mobile telephone services.
- l. Telford v. Intellectual Capital Management, Inc., et al.**, No. 14-cv-0064 (United States District Court for the Eastern District of New York). Tostrud Law Group, P.C., along with co-counsel, represents plaintiffs who received unsolicited text messages from Muscle

Maker Grill, a restaurant franchise with locations throughout the United States. Plaintiffs did not consent to receiving the text messages from Muscle Maker and were harmed as a result of defendants' actions. Tostrud Law Group seeks to represent a nationwide class of persons who received one or more unauthorized text messages from or on behalf of Muscle Maker Grill.

- m. Shadpour v. Facebook**, No. 14-cv-307 (United States District Court of the Northern District of California). Tostrud Law Group, P.C., serves as co-counsel seeking to represent a nationwide class of individuals who sent, received, or posted private Facebook messages. Plaintiffs allege Facebook reviewed or scanned users' private messages in violation of express privacy agreements. Tostrud Law Group seeks actual and statutory damages on behalf of the putative class.
- n. Small v. University Medical Center of Southern Nevada**, No. 12-cv-395 (United States District Court for the State of Nevada). Tostrud Law Group, P.C. serves as co-counsel representing employees who allege defendant University Medical Center ("UMC") failed to pay them properly for missed meal breaks under the Fair Labor Standards Act. After, the court granted Plaintiffs' motion for conditional certification on June 14, 2013, approximately 600 current and former UMC employees agreed to join the case. After a granting Plaintiffs' motion to compel in July 2013, the court appointed a Special Master to oversee the discovery process. The Special Master ultimately made numerous factual findings in support of Rule 23 class certification and concluded in a 78-page Report and Recommendation that defendant UMC had failed to identify, preserve, search for, collect and process relevant evidence. The case is currently stayed pending a decision by the court on the Special Master's report.
- o. In Re Lithium Ion Batteries**, No. 13-MD-2420 (United States District Court for the Central District of California). Tostrud Law Group, P.C., serves as co-counsel representing consumers against Sony, Panasonic, Hitachi, LG Chem, Samsung, and Sanyo

for allegedly conspiring to fix and raise the prices of lithium-ion rechargeable batteries in violation of United States antitrust laws. Plaintiffs allege that as a direct result of defendants' anticompetitive conduct, consumers paid artificially inflated prices for lithium-ion rechargeable batteries.

- p. **In Re: Hyundai and Kia Fuel Economy Litigation**, No. MDL 13-2424 (United States District Court for the Central District of California). Tostrud Law Group, P.C., along with co-counsel, represents Hyundai and Kia vehicle owners who allege the defendants misstated fuel-economy figures for certain 2011-2013 vehicles. Plaintiffs allege Hyundai and Kia mislead consumers by advertising their cars' high highway mpg ratings, not the combined number, which was closer to the real-world fuel-economy and much lower than what was advertised.
- q. **Grodzitsky v. American Honda Motor Co.**, No. 12-cv-1142 (United States District Court for the State of Nevada). Tostrud Law Group, P.C., serves as co-counsel representing plaintiffs against American Honda for manufacturing and selling vehicles with allegedly defective window mechanisms. The side windows in the subject Honda vehicles move up and down by a device mounted inside the door frame known as a "window regulator." When the window regulator fails, the side window becomes inoperable and is often permanently stuck in the fully-open, closed, or partially open position, endangering occupants. Tostrud Law Group is seeking to represent a nationwide class of consumers who purchased or leased certain Honda vehicles that are equipped with the allegedly faulty window regulators.

In addition to the above representative cases, Tostrud Law Group, P.C. is currently prosecuting several other class and/or collective actions, including data breach and privacy cases, product liability and securities fraud class actions, and several antitrust cases against large companies.

# **EXHIBIT B**

**EXHIBIT B**

In re Lithium Ion Batteries Antitrust Litigation  
**Tostrud Law Group, P.C.**  
 Reported Hours and Lodestar  
 June 1, 2013 through February 28, 2017

**TIME REPORT**

<b>NAME</b>	<b>TOTAL HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>LODESTAR</b>
<b>ATTORNEYS</b>			
Jon Tostrud (P)	4.40	\$600	\$2,640.00
<b>NON-ATTORNEYS</b>			
Name (PL)	0.00	\$	\$
Name (LC)	0.00	\$	\$
<b>TOTAL:</b>		<b>0.00</b>	<b>\$2,640.00</b>

(P) Partner  
 (OC) Of Counsel  
 (A) Associate  
 (PL) Paralegal  
 (LC) Law Clerk

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

**Firm Name: Tostrud Law Group, P.C.**

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
Jon A Tostrud (P)	0.90					3.50									4.40	\$600.00	\$2,640.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
															0.00	\$0.00	\$0.00
<b>SUB-TOTAL</b>	<b>0.90</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>3.50</b>	<b>0.00</b>	<b>4.40</b>		<b>\$2,640.00</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>0.90</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>3.50</b>	<b>0.00</b>	<b>4.40</b>		<b>\$2,640.00</b>							

# EXHIBIT C



# **EXHIBIT D**

**(REDACTED)**

Tostrud Law Group, P.C.

1925 Century Park East, Suite 2100

Los Angeles, CA 90067

Date	Customer	Activity	Units	Rate	Billable \$	Notes
Tostrud, Jon		*None				
7/25/13	AT-Lithium Ion Batteries	Billable Hours	0.3	\$600.00	\$180.00	Tel. w/atty J. Cuneo re: case strategy and status
7/28/13	AT-Lithium Ion Batteries	Billable Hours	0.3	\$600.00	\$180.00	Tel. w/JC re:case status, discovery and indictment
7/28/13	AT-Lithium Ion Batteries	Billable Hours	0.3	\$600.00	\$180.00	Contact [REDACTED] re:same
4/27/15	AT-Lithium Ion Batteries	Billable Hours	0.7	\$600.00	\$420.00	Review discovery request to Plaintiff [REDACTED]
4/27/15	AT-Lithium Ion Batteries	Billable Hours	0.4	\$600.00	\$240.00	Conference call w/Cuneo re: discovery projects
4/29/15	AT-Lithium Ion Batteries	Billable Hours	0.9	\$600.00	\$540.00	Contact [REDACTED] re: discovery responses
5/1/15	AT-Lithium Ion Batteries	Billable Hours	1.5	\$600.00	\$900.00	Draft and review discovery responses w/client [REDACTED]
		Tostrud, Jon Total:			\$2,640.00	
		Grand Total:			\$2,640.00	

# **EXHIBIT E**

**EXHIBIT E**

In re Lithium Ion Batteries Antitrust Litigation

**Tostrud Law Group, P.C.**

Reported Expenses Incurred on Behalf of IPPs

**EXPENSE REPORT**

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
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)	\$50.00
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	\$2,543.70
Miscellaneous	
<b>TOTAL:</b>	<b>\$2,593.70</b>