EXHIBIT 41

DECLARATION OF E. KIRK WOOD IN SUPPORT OF IPPS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF WOOD LAW FIRM, LLC; No. 13-md-02420-YGR (DMR)

I, E. Kirk Wood, declare:

- 1. I am the managing member of Wood Law Firm, LLC, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
- 2. My firm has served as counsel to Maury Kim Billingsley and as counsel for IPPs throughout the course of this litigation. The background and experience of Wood Law Firm, LLC and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.
- 3. Wood Law Firm, LLC has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While Wood Law Firm, LLC devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.
- 4. During the pendency of the litigation, Wood Law Firm, LLC performed the following work: met with class representative and provided representation with updates on the status of the litigation, met with class representative to assist with preparation of discovery responses, and helped prepare class representative for his deposition.
- 5. Attached hereto as **Exhibit B** is a billing summary of Wood Law Firm, LLC's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Wood Law Firm, LLC during this period of time was 9.1 hours, with a corresponding lodestar based on current rates of \$6,370.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Wood Law Firm, LLC.

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 billi	ng rates. The entries in Exhibit D have been redacted per the Court's Order in ECF
5	No. 1803.	
6	8.	Wood Law Firm, LLC is not seeking expense reimbursement.
7	9.	I have reviewed the time and expenses reported by Wood Law Firm, LLC in this
8	case which are	e included in this declaration, and I affirm that they are true and accurate.
9		
10	I decla	are under penalty of perjury under the laws of the United States that the foregoing is
11	true and corre	ct.
12	Execu	ted on May 23, 2017 at Birmingham, Alabama
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14		/s/ E. Kirk Wood
15		E. KIRK WOOD
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1	ATTESTATION
2	I, Steven N. Williams, hereby attest, pursuant to United States District Court, Northern
3	District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document
4	has been obtained from the signatory hereto.
5	
6	By: /s/ Steven N. Williams
7	Steven N. Williams
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28	DECLARATION OF E. KIRK WOOD IN SUPPORT OF IPPS' MOTION FOR AN AWARD OF

ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF WOOD LAW FIRM, LLC; Case No. 13-md-02420-YGR (DMR)

EXHIBIT A

FIRM RESUME

E. Kirk Wood - Managing Partner Wood Law Firm, LLC P.O. Box 382434; Birmingham, AL 35238 Phone: (205) 612-0243; Fax: 866-747-3905 ekirkwood1@bellsouth.net

EDUCATION:

BS, University of Alabama 1976; MS, Troy University 1984; JD, Cumberland School of Law 1987

LICENSED:

Alabama and Florida Bar

INSTRUCTION:

Adjunct Professor of Law, University of Alabama, 1992

ADMITTED:

Supreme Court of Alabama; Supreme Court of Florida; US District Court for the Northern District of Alabama; US District Court for the Middle District of Alabama; US District Court for the Northern District of Florida; US Court of Appeals for the Eleventh Circuit; US Court of Appeals for the Fourth Circuit

MEMBER:

American Bar Association; Alabama Bar Association; Florida Bar Association; Birmingham Bar Association; Federal Bar Association

RECENT REPRESENTATIVE MULTI DISTRICT AND CLASS LITIGATION MATTERS:

(All of which are now closed):

In re: TJX Retail Security Breach Litigation
In re: Vioxx Products Liability Litigation

In re: Bausch & Lomb Contact Lens Solution Products Liability Litigation (Plaintiffs

Steering Committee)

In re: Heparin Products Liability Litigation (Plaintiffs Steering Committee)

In re: Total Body Formula Products Liability Litigation (Co-Lead and Liaison Counsel;

Plaintiffs Executive Committee)

In re: Puerto Rico Cabotage Antitrust Litigation (Plaintiffs Steering Committee)
In re: Countrywide Security Breach Litigation (Plaintiffs Steering Committee)

In re: Hydroxycut Marketing and Sales Practices Litigation

In re: Heartland Payment Systems, Inc. Customer Data Security Breach Litigation

Denise Howerton, et al. vs. Cargill, Inc. (Truvia)

CURRENT MULTI DISTRICT AND PUTATIVE CLASS LITIGATION MATTERS:

In re: Pharmacy Benefit Managers Antitrust Litigation;

In re: Zappos.com, Inc., Customer Data Security Breach Litigation;

In re: The Home Depot, Inc., Customer Data Security Breach Litigation;

In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20,

2010:

In re: DePuy Orthopaedics, Inc. ASR Hip Implant Products Liability Litigation;

In re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation;

In re: Stryker Rejuvenate and ABG II Hip Implant Products Liability Litigation;

In re: Blue Cross Blue Shield Antitrust Litigation (Plaintiffs Local Facilitating Counsel;

Plaintiffs Steering Committee);

In re: Community Health Systems, Inc., Customer Security Data Breach Litigation;

In re: Target Corporation Customer Data Security Breach Litigation;

Angel Aguiar, et al. vs. Mersiant Company and Whole Earth Sweetener Company, LLC

(Pure Via)

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT TIME REPORT- MONTHLY

Firm Name: WOOD LAW FIRM, LLC

Categories:

Investigations, Factual Research
 Drafting Discovery Requests
 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.

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

(LC) Law Clerk (PL) Paralegal (L) Librarian

(A) Associate (P) Partner

(10) Class Certification/Experts

(11) Litigation Strategy, Analysis & Case Management

(12) Negotiating Settlements (13) Trial and Trial Preparation (14) Court Appearance and Prep

ATTORNEYS	_	2	3	4	s	9	7	8	6	10	=	12	13	14	HOURLY RATE	HOURLY CUMULATIVE CUMULATIVE RATE HOURS LODESTAR	CUMULATIVE LODESTAR
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NON-ATTORNEYS															\$0.00	00.0	0
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EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

WOOD LAW FIRM, LLC

ATTORNEYS	DATE RANGE	HOURLY RATE
E. Kirk Wood	6-29-13 - 10-22-14	\$550.00
E. Kirk Wood	3-20-15 - 5-26-15	\$600.00
E. Kirk Wood	2-4-16 - 4-12-16	\$700.00
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NON-ATTORNEYS	DATE RANGE	HOURLY RATE

EXHIBIT D

(REDACTED)

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Date	Name	Title	Fim	Description of Work	Hours	Rate	Total
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6/29/13	6/29/13 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Conference with Casey Lott	0.2	\$550.00	\$110.00
7/1/13	7/1/13 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Meeting with	0.5	\$550.00	\$275 00
7/26/13	7/26/13 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of first amended complaint	0.5	L	\$275.00
4/8/14	4/8/14 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of second amended complaint	0.5		\$275.00
10/2/14	10/2/14 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Meeting with client; conference with Casey Lott	0.55		\$275.00
10/22/14	10/22/14 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review third amended complaint	0.00		\$275.00
3/20/15	3/20/15 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of discovery	0.5		\$300.00
7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7				Conference with Casey			And the second s
5/11/15	5/11/15 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Lott RE discovery	-	\$600.00	\$600.00
5/26/15	5/26/15 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review additional discovery	0.2	\$600.00	\$120.00
2/4/16	2/4/16 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review deposition notice	0.5	\$700.00	\$350.00
3/8/16	3/8/16 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review acknowledgement and agreement	0.4	\$700.00	\$280.00
3/16/16	3/16/16 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review fourth amended complaint	0.5	L	\$350.00
				Review of declaration; conference with			
3/18/16	3/18/16 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Casey Lott	0.3	\$700.00	\$210.00
3/23/16	3/23/16 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review esponses to discovery	0.5	\$700.00	\$350.00
				Review deposition; conference with Casey		411000000000000000000000000000000000000	
4/12/16	4/12/16 E. Kirk Wood	Attorney	Wood Law Firm, LLC	Lott	2.5	\$700.00	\$1,750.00
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	ATTANA					TOTAL	&£ 705.00
							70.00.00
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	EXPENSES	\$0.00	THE PROPERTY OF THE PROPERTY O	TOTAL			THE RESIDENCE OF THE PERSON OF
	ATTORNEY FEES	\$5,795.00					
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