

# EXHIBIT 7

1 Whitney Street (Bar Number 223870)  
2 BLOCK & LEVITON LLP  
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6 F: (617) 507-6020  
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8 *Counsel for Indirect Purchaser Plaintiffs*

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11 **UNITED STATES DISTRICT COURT**  
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13 **NORTHERN DISTRICT OF CALIFORNIA**  
14  
15 **OAKLAND DIVISION**

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

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

18 **This Document Relates to:**  
19  
20 **ALL INDIRECT PURCHASER ACTIONS**

**DECLARATION OF WHITNEY E. STREET IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BLOCK & LEVITON LLP**

21 I, Whitney E. Street, declare:

22 1. I am a partner at Block & Leviton LLP, Counsel for Indirect Purchaser Plaintiffs  
23 (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of IPPs’ Motion for an  
24 Award of Attorneys’ Fees and Reimbursement of Expenses. I make this declaration based on my  
25 personal knowledge and if called as a witness, I could and would competently testify to the  
26 matters stated herein.

27 2. My firm has served as counsel for IPPs throughout the course of this litigation. The  
28 background and experience of Block & Leviton LLP and its attorneys are summarized in the  
curriculum vitae attached hereto as **Exhibit A**.

3. Block & Leviton LLP 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

1 against the defendants. While Block & Leviton LLP devoted its time and resources to this matter,  
2 it has foregone other legal work for which it would have been compensated.

3 4. During the pendency of the litigation Block & Leviton LLP performed the  
4 following work: coordinated discovery of municipal plaintiffs, the City of Richmond and Palo  
5 Alto; defended client depositions; performed Korean and English language document review;  
6 assisted with factual research for IPPs' expert reports; assisted with preparation for depositions of  
7 Defendants' expert witnesses; and, performed legal research and drafting related to reply in  
8 support of IPPs' motion for class certification.

9 5. Attached hereto as **Exhibit B** is a billing summary of Block & Leviton LLP's total  
10 hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017.  
11 Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment  
12 of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent  
13 by Block & Leviton LLP during this period of time was 1,513.70, with a corresponding lodestar  
14 based on current rates of \$697,196.00. The lodestar amount reflected in Exhibit B is for work  
15 assigned by Lead Counsel, and was performed by professional staff at my law firm. This  
16 summary was prepared from contemporaneous, daily time records regularly prepared and  
17 maintained by Block & Leviton LLP.

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

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

23 8. Attached hereto as **Exhibit E** is a summary of the expenses Block & Leviton LLP  
24 has incurred during the course of this litigation. Block & Leviton LLP expended a total of  
25 \$102,482.11 in unreimbursed costs and expenses in connection with the prosecution of this case.  
26 These expenses were incurred on behalf of IPPs by Block & Leviton LLP on a contingent basis  
27 and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense

1 vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses  
2 incurred.

3 9. I have reviewed the time and expenses reported by Block & Leviton LLP in this  
4 case which are included in this declaration, and I affirm that they are true and accurate.

5  
6 I declare under penalty of perjury under the laws of the United States that the foregoing is  
7 true and correct.

8 Executed on May 22, 2017 at Oakland, California.

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*/s/ Whitney E. Street*

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Whitney E. Street

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**ATTESTATION**

I, Steven N. Williams, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from the signatory hereto.

By: */s/ Steven N. Williams*

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Steven N. Williams

# **EXHIBIT A**

**BLOCK & LEVITON LLP**

155 Federal Street, Suite 400 | Boston, MA 02110

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1735 20<sup>th</sup> St NW | Washington, DC 20009

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***Fight for a level playing field.*** Block & Leviton believes investors, pensioners, consumers and employees deserve an advocate who will take a stand to protect their rights. We value our role not only in recovering our clients' immediate losses, but in protecting their long-term interests by helping to shape corporate policy. We genuinely enjoy our work, which each day offers an opportunity to tackle novel problems and unique challenges in a continuously evolving economy. We concur with Aristotle's observation that *pleasure in the job puts perfection in the work*. We believe this is reflected in our track record, which includes our ability to take a case to trial and win, as well as our appointment as lead or co-lead counsel in many dozens of high profile matters, including: *In re BP Securities Litig.*, Case No. 4:10-MD-02185 (S.D. Tex.) (settled for \$175 million), *In re Google Class C Shareholder Litig.*, Case No. 7469-CS (Del. Ch.) (settled for \$522 million) and *In re: Drywall Antitrust Litigation*, Case No. 13-md-02437 (E.D. Pa.) (to date, settlements with 2 of 6 defendants totaling more than \$10 million), and *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices and Products Liability Litig.*, Case No. 3:15-md-02672 (N.D. Cal.) (settled for approximately \$15 billion). Our attorneys have successfully recovered billions for our clients and class members and have done so even under adverse conditions, including successfully litigating against bankrupt and foreign-based corporations.

***Defy convention.*** Instrumental to our philosophy is the willingness to embrace new ways of seeing, and solving, our clients' problems. For example, we challenged Google Inc.'s plan to issue a new class of non-voting stock that threatened to diminish the value of minority investors' holdings in the company. With trial set to begin in less than two days, Block & Leviton brokered a settlement with Google Inc. and its directors that provided for a forward-looking payment ladder (valued at up to \$7.5 billion) to protect minority investors against future diminution in their stock value. As a result of the payment ladder, shareholders ultimately recovered \$522 million in cash and stock in May 2015. Appreciation of the fact that each of our clients has a unique viewpoint allows us to tailor our advice and representation accordingly to achieve superior results, and to do so with maximum efficiency.

***Surround yourself with the best.*** The Firm credits its success to its entire team of extremely talented, dedicated attorneys, the majority of whom have significant litigation experience. An in-depth *curriculum vitae* highlighting each attorney's areas of expertise, unique experience, recognition in the field and education credentials follows.

## EDUCATION

- ❖ Brooklyn Law School, J.D.,  
*cum laude* 1986
- ❖ State University of New York,  
B.A., Political Science,  
*cum laude* 1983

## BAR ADMISSIONS

- ❖ New York
- ❖ Massachusetts

## COURT ADMISSIONS

- ❖ Southern District of New York
- ❖ Eastern District of New York
- ❖ District of Massachusetts
- ❖ United States Court of Appeals  
for the First, Second, Third,  
Ninth and Eleventh Circuits
- ❖ United States Supreme Court

## PUBLICATIONS | SPEAKING EVENTS

- ❖ ALI-ABA Conference for  
Insurance and Financial  
Services Industry Litigation,  
July 2009, Lecturer and Panelist
- ❖ *Damages in Securities  
Litigation*, sponsored by Law  
Seminars International at the  
Harvard Club, Panelist
- ❖ *Litigation to Remedy Meltdown  
Damages: What Can Be  
Gained?*, Harvard Law School's  
Capital Matters Conference,  
Speaker
- ❖ Guest commentator on NBC
- ❖ International Strategies  
Recoveries for Foreign  
Investments, Post *Morrison*, San  
Francisco Bar Association,  
Panel Moderator

## JEFFREY C. BLOCK

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Mr. Block is a co-founding partner of Block & Leviton. With a career spanning thirty years, Mr. Block is recognized as one of the nation's preeminent class action attorneys and is recognized as a "Super Lawyer" by *Massachusetts Super Lawyers*. Mr. Block currently represents the Ohio Public Employees Retirement System in *In re: BP Sec. Litig.*, No. 4:10-MD-02185 (S.D. Tex.), charging that BP misled investors as to the amount of oil leaking from the Macondo well after the explosion aboard the *Deepwater Horizon* oil rig in the Gulf of Mexico in 2010. Mr. Block, on behalf of the plaintiffs, successfully argued against defendants' motions to dismiss, in favor of class certification, in opposition to summary judgment, and helped secure a settlement of \$175 million for the class, which represents more than 60% of the class' actual losses. Mr. Block also represented the Brockton Retirement System in an action challenging Google's attempt to split its stock into voting and non-voting shares. See *In re Google, Inc. Class C S'holder Litig.*, case no. 7469-CS (Del. Ch. Ct.). Two days before the start of trial, the action settled for significant corporate governance changes and a payment ladder valued up to \$7.5 billion, which was designed to protect shareholders against any diminution in the value of their shares during the first year of trading. Because of the payment ladder, shareholders ultimately recovered \$522 million in cash and stock in May 2015.

In addition, Mr. Block represents some of the country's largest institutional investors, including the Massachusetts Pension Reserves Investment Management Board (PRIM), the Ohio Public Employees Retirement System, the Ohio State Teachers Retirement System, the Washington State Investment Board, the New Mexico Educational Retirement Board, the New Mexico Public Employees Retirement System, the New Mexico State Investment Council and the Oklahoma Police Pension and Retirement System.

Some of the major class actions that Mr. Block has either led, or played a significant role in, include: *In re First Executive Corp. Securities Litig.*, 89-cv-7135 (C.D. Cal.) (settled for \$100 million); *In re Xerox Corp. Sec. Litig.*, 3:00-cv-01621 (D. Conn.) (settled for \$750 million); *In re Bristol Myers Squibb Sec. Litig.*, 02-cv-2251 (S.D.N.Y.) (settled for \$300 million); *In re Lernout & Hauspie Sec. Litig.*, 1:00-cv-11589 (D. Mass.) (settled for \$180 million); *In re*



*Symbol Technologies Sec. Litig.*, 2:02-cv-1383 (E.D.N.Y.) (settled for \$127 million); *In re Prison Realty Corp. Sec. Litig.*, 3:99-cv-0452 (M.D. Tenn.) (settled for over \$100 million); *In re Philip Services Corp. Sec. Litig.*, 98-cv-835 (S.D.N.Y.) (settled for \$79.75 million); *In re American Home Mortgage Sec. Litig.*, 07-MD-1898 (E.D.N.Y.) (settled for \$50.5 million); *In re Force Protection Sec. Litig.*, 2:08-cv-845 (D.S.C.) (\$24 million settlement); *In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.) (\$5.5 million settlement).

Mr. Block has a proven record of overcoming significant challenges to obtain substantial recoveries on behalf of his clients. For example, in the *Philip Services* securities litigation, Mr. Block persuaded the United States Court of Appeals for the Second Circuit to reverse the District Court's dismissal of the action on the grounds of *forum non conveniens*. See *Dirienzo v. Philip Services Corp.*, 294 F.3d 21 (2d. Cir. 2002). Upon reversal, Mr. Block led the team of attorneys in taking more than 40 depositions and, upon the eve of trial, the action settled for \$79.50 million, among the largest recoveries ever in a securities action from a Canadian accounting firm. Mr. Block's skills were discussed in great lengths by the court, specifically noting that counsel:

“pursued this fact-intensive and legally complex litigation vigorously over a nine-year period, rejected offers of settlement for amounts inferior to the amounts upon which the parties ultimately agreed, and assumed significant risks of non-recovery. Co-Lead Counsel had to overcome the disclaimers and uncertainties of insurance coverage, and vigorous advocacy of extremely able and deeply-staffed defense counsel. ... And **THEY DID THEIR WORK EFFICIENTLY, WITH MINIMAL DUPLICATION, AND MAXIMUM EFFECTIVENESS.**”

*In re Philip Servs. Corp. Sec. Litig.*, 2007 U.S. Dist. LEXIS 101427, 13-14 (S.D.N.Y. Mar. 27, 2007) (Honorable Alvin K. Hellerstein). Similarly, in *Lernout & Hauspie Sec. Litig.*, Mr. Block was the lead attorney in securing over \$180 million for defrauded investors. The action involved an accounting fraud of a company headquartered in both the United States and Belgium.

Recently, Mr. Block led a team of litigators, private investigators and a forensic accountant through a complex accounting fraud case. Mr. Block settled the case on terms extremely beneficial to the class, as recognized by the court. See *In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.).

**“I was careful to choose attorneys who have great ability [and] great reputation... And I think you’ve undertaken the representation of these people, you’ve done an excellent job, you’ve reached a settlement that I think is fair and in their benefit ...”.**

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Honorable C. Weston Houck,  
*In re Force Protection Sec. Litig.*, 2:08-cv-845 CWH  
(D.S.C.) (\$24 million settlement)

**“The settlement is – gosh. . . the fact that it’s occurring within the context of a securities case, which is very difficult for plaintiffs to win, is extremely impressive to me. . . [T]his is a matter which has been fairly litigated by people who know what they’re doing.”**

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Honorable Graham C. Mullen, *In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.) (\$5.5 million settlement)

**EDUCATION**

- ❖ Georgetown University Law Center, LL.M., Securities and Financial Regulations (Dean's Award (1 of 6))
- ❖ Gonzaga University School of Law, J.D., *cum laude*, Moot Court Council, International Law Review
- ❖ Gonzaga University, B.A., Philosophy and Political Science

**BAR ADMISSIONS**

- ❖ Massachusetts
- ❖ District of Columbia
- ❖ State of Washington
- ❖ State of Florida

**COURT ADMISSIONS**

- ❖ District of Massachusetts
- ❖ District of Washington D.C.
- ❖ Western District of Washington

**PUBLICATIONS | SPEAKING EVENTS**

- ❖ Guest on *Rights Radio*
- ❖ Law360 Securities Law Editorial Advisory Board
- ❖ SEC Litigation Release No. 18638, primary author
- ❖ Contributor, *After the Ball is Over: Investor Remedies in the Wake of the Dot-Com Crash and Recent Scandals*, Nebraska Law Review, 2005
- ❖ Speaker at Georgetown University Law Center on prosecution of securities class action lawsuits
- ❖ Presenter at Business Law Symposium entitled *Shareholder Rights: An Idea Whose Time has Come*, November 2013
- ❖ Presenter at National Conference on Public Employee Retirement Systems' Summer Conference, May 2013

**JASON M. LEVITON**

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Mr. Leviton is a co-founding partner of Block & Leviton and focuses his practice on investor protection and shareholder rights matters. He serves as Co-Chair of the Firm's New Case Investigation and Monitoring Team and Chair of the Merger and Acquisition Litigation Team. In 2011 and each year thereafter, Mr. Leviton was named a "Rising Star" by *Massachusetts Super Lawyers*, an honor given to only 3% of all lawyers in the Commonwealth. In 2014, Mr. Leviton was named as a Top 100 Trial Lawyer by the National Trial Lawyer Association. After receiving his law degree, Mr. Leviton attended the Georgetown University Law Center and received a Master of Laws (LL.M.) in Securities and Financial Regulation (Dean's Award, 1 of 6). During that time, he was the inaugural LL.M. student selected for an externship with the S.E.C., Enforcement Division. Mr. Leviton is now a member of the Association of Securities and Exchange Commission Alumni.

Currently, Mr. Leviton represents several Ohio Pension Funds against BP following the largest oil spill in United States history. *See In re BP plc Securities Litigation*, Case No. 10-cv-2185 (S.D. Tex.) (settled for \$175 million). Mr. Leviton also serves as co-lead counsel in *In re Onyx Pharmaceuticals Inc. Shareholder Litigation*, Case No. CIV523789 (Cal. Sup. Ct) (settled for \$30 million). In addition, Mr. Leviton has been named lead or co-lead counsel in numerous class actions, including: *In re Plains Exploration & Production Co. Stockholder Litig.*, Case No. 8090-VCN (Del. Ch.) (litigation led to an increase of approximately \$400 million to the original merger amount); *In re MIPS Technologies, Inc. Stockholder Litig.*, Case No. 8103-VCN (Del. Ch.) (settled for numerous material disclosures and amendments to the merger agreement); *In re Cybex Int'l Shareholders Litig.*, Case No. 653794/2012 (N.Y. Sup. Ct) (settlement involved substantial dividend payment to shareholders); and *In re Sunoco, Inc.*, Case No. 1204-03894 (settlement required Sunoco to publish an update to its Proxy Statement to correct for material omissions).

Mr. Leviton has achieved significant recoveries on behalf of class members, including but not limited to: *In re Empire State Realty Trust, Inc. Investor Litigation*, case no. 650607/2012 (settled for \$55 million); *In re KIT Digital, Inc. Securities Litigation*, Case No. 12-04199 (S.D.N.Y.) (settled for more than \$6 million following the company's voluntary petition for bankruptcy); *In re Swisher Hygiene, Inc. Sec. and Deriv. Litig.*, MDL No. 3:12-MD-2384-GCM (W.D.N.C) (settled for nearly 40% of all cognizable damages); and *Brockton Retirement*

*Board and City of Quincy Contributory Retirement Systems v. Oppenheimer Global Resource Private Equity Fund I, L.P., et al.*, Case No. 1:12-cv-10552 (D. Mass.) (settled for numerous improvements to Oppenheimer's corporate governance structure regarding the valuation of assets). In addition to his class action experiences, Mr. Leviton has litigated other forms of complex litigation. For instance, he worked with a former State of New York Attorney General in the defense of an attorney accused of insider trading, which included a criminal referral to the United States Department of Justice. He was also heavily involved in the representation of four detainees being held at the Guantánamo Bay Naval Station in Cuba.

Moreover, Mr. Leviton has represented former employee whistleblowers before the S.E.C. where, in one instance, he successfully argued that his clients should receive the maximum whistleblower award of 30% pursuant to the Dodd-Frank Act, which equated to nearly \$1 million. He also represented the same whistleblower in a retaliation claim against several Oppenheimer-related entities. *See John Doe v. Oppenheimer Asset Management, Inc., et al.*, Case No. 1:14-cv-00779-LAP (S.D.N.Y.).

Mr. Leviton also has considerable experience litigating consumer class action cases involving deceptive business practices. For example, Mr. Leviton, as co-lead counsel, successfully recovered 100% of the class's alleged damages stemming from the overcharging of scooped coffee beans at Starbucks stores throughout the country. *See In re Starbucks Consumer Litig.*, Case No. 2:11-cv-01985-MJP (W.D. Wa.).

Prior to forming Block & Leviton, Mr. Leviton was an attorney at three other preeminent class action firms. There, he was instrumental in recovering \$10.5 million in the *Welmon v. Chicago Bridge & Iron*, Case No. 06-cv-01283, securities class action litigation. In that case, Mr. Leviton represented Fortis Investments, a major European asset management company and, in addition to the monetary settlement, was able to institute several corporate governance changes at the company. In granting the *Chicago Bridge & Iron* settlement, the Honorable John Sprizzo stated that **"PLAINTIFFS' COUNSEL HAVE CONDUCTED THE LITIGATION AND ACHIEVED THE SETTLEMENT WITH SKILL, PERSEVERANCE AND DILIGENT ADVOCACY."** *Chicago Bridge & Iron* (June 3, 2008). Moreover, in the *Ong v. Sears Roebuck & Co.*, Case No. 03 C 4142 (N.D. Ill.), securities class action, Mr. Leviton represented the State Universities Retirement System of Illinois (SURS) and helped settle the action for \$15.5 million. He also represented the Iowa Public Employees' Retirement System, the Policemen's Annuity & Benefit Fund of Chicago, the Central States, Southeast and Southwest Areas Pension Fund in the securities class action against MF Global that settled for \$90.0 million. *See Rubin v. MF Global, LTD., et al.*, Case No. 08-cv-02233 (S.D.N.Y.). Likewise, he was a member of the *In re VeriSign Securities Litigation*, Case No. C-02-2270 (N.D. Cal.) team that recovered more than \$78.0 million for investors.

## EDUCATION

- ❖ University of Virginia School of Law, J.D.
- ❖ University of Virginia, B.A., Economics and Literature

## BAR ADMISSIONS

- ❖ California
- ❖ New York
- ❖ Massachusetts
- ❖ Texas

## COURT ADMISSIONS

- ❖ Northern District of California
- ❖ Southern District of New York
- ❖ Eastern District of New York
- ❖ District of Massachusetts

## PROFESSIONAL ACTIVITIES

- ❖ Co-Chair of the American Association for Justice Antitrust Litigation Group
- ❖ Law360 Competition Law Editorial Advisory Board
- ❖ Massachusetts Academy of Trial Attorneys
- ❖ National Association of Public Pension Attorneys

## PUBLICATIONS | SPEAKING EVENTS

- ❖ Co-Author, *What Lies Ahead in High Stakes Pay-For-Delay Antitrust Litigation*, American Association of Justice Business Torts Newsletter (May 2015)
- ❖ Author, *Technology Assisted Review: the Disclosure of Training Sets and Related Transparency Issues*, Georgetown Law Advanced eDiscovery Institute (Fall 2014)
- ❖ Faculty, Georgetown University Law Advanced eDiscovery Institute (November 2014)
- ❖ Co-Author, *Decision Re-Affirms Critical Role of Shareholders* Benefits and Pensions Monitor (October 2014)
- ❖ Panelist, American Association for Justice Class Certification Seminar (2013)

## WHITNEY E. STREET

Partner

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Block & Leviton Partner Whitney Street has nearly fourteen years of complex litigation experience and significant expertise in antitrust and securities class action litigation. Ms. Street, who serves as Chair of the Firm's Competition Law Group, was appointed Co-Lead Counsel on behalf of a class of indirect purchasers in *In re Domestic Drywall Antitrust Litig.*, 13-md-02437 (E.D.Pa.), which involves allegations of price fixing and other forms of concerted conduct in violation of the antitrust laws. To date, Ms. Street has recovered more than \$10 million on behalf of the class of indirect purchasers. The litigation is ongoing against the remaining four defendants. In addition, Ms. Street represents the City of Providence in an antitrust class action suit against Celgene Corp. for unlawfully excluding generic competition for vital cancer treatment drugs. *See In re Thalomid and Revlimid Antitrust Litig.*, 14-cv-06997 (D.N.J.). Most recently, Ms. Street was appointed to the Plaintiffs' Steering Committee in *In re Packaged Seafood Antitrust Litig.*, 15-md-02670 (S.D.Cal.) (alleging price fixing in the market for shelf-stable seafood products) and in *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and price fixing in the market for aluminum sulfate).

Ms. Street was also an integral part of the litigation teams in the following antitrust class actions: *Air Cargo Shipping Services Antitrust Litigation*, 06-md-1775 (E.D.N.Y.) (settlements totaling more than \$270.0 million); *In re: Ethylene Propylene Diene Monomer (EPDM) Antitrust Litigation*, 3:03-md-1542 (D. Conn.) (partial settlements totaling \$87.0 million); *In re: Methyl Methacrylate (MMA) Antitrust Litigation*, 06-md-01768 (E.D. Pa.) (settled for \$15.0 million); and *In re: Hydrogen Peroxide Antitrust Litigation*, 05-civ-666 (E.D. Pa.) (partial settlements of more than \$4.0 million).

Ms. Street received her training at prominent litigation firms in New York and Boston where she represented clients in antitrust and securities class actions. She began her career at Pillsbury Winthrop Shaw Pittman, one of the largest law firms in California.

## EDUCATION

- ❖ College of William & Mary, Marshall-Wythe Law School, J.D.
- ❖ College of William & Mary, B.A., History and Classical Studies

## BAR ADMISSIONS

- ❖ California
- ❖ District of Columbia

## COURT ADMISSIONS

- ❖ Second, Fourth, Fifth, Seventh, Eighth, Ninth, Tenth and Eleventh Circuit Courts of Appeal
- ❖ District of Columbia
- ❖ Southern, Central and Northern Districts of California
- ❖ District of Maryland
- ❖ Northern and Western Districts of Texas
- ❖ Northern District of Illinois

## PROFESSIONAL ACTIVITIES

- ❖ Co-Chair of the Civil Procedure Subcommittee for the ABA Employee Benefits Committee
- ❖ Co-Chair of American Association of Justice (AAJ)
- ❖ Chair of Employment Rights Section of the AAJ from 2013 to 2014

## R. JOSEPH BARTON

Partner

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Email. joe@blockesq.com

R. Joseph Barton, a Partner at the Firm, is the Chair of the Firm's Employee Benefits Group and the Firm's Veterans/Servicemember Rights Group at the Firm. Mr. Barton has more than 15 years experience handling a diverse array of complex and class litigation. Mr. Barton has a Martindale-Hubbell AV Preeminent Rating, has been selected every year since 2013 as a Washington, D.C. Super Lawyer, has a 10.0 rating from Avvo, and is listed in the Marquis' Who's Who in American Law.

### Notable ERISA Cases

Over the last 15 years, Mr. Barton has handled a wide variety of employee benefit (i.e. ERISA) cases. He has been trial counsel in four ERISA cases. He was lead trial counsel in a case challenging a complex transaction involving the Trachte ESOP and the Alliance ESOP on behalf of a class of employees of Trachte, *Chesemore v. Alliance Holdings, Inc.*, No. 3:09-cv-00413 (W.D. Wis.). In that case, Mr. Barton obtained a favorable trial decisions on a liability and remedies of \$17.2 million (plus prejudgment interest) for the Class which was affirmed by the Seventh Circuit. In *Severstal Wheeling Inc. Ret. Comm. v. WPN Corporation*, No. 10-cv-954 (S.D.N.Y.), Mr. Barton was lead trial counsel representing the fiduciaries of two pension plan suing their former investment manager for improper investments and obtained a judgment for plaintiffs of over \$15 million which was affirmed by the Second Circuit.

Mr. Barton is among a handful of lawyers who regularly represent participants in litigation involving ESOPs holding privately held stock. In addition to the Alliance/Trachte ESOP litigation, Mr. Barton has litigated and is litigating a number of private ESOP cases, including the Jeld-Wen ESOP, the Tharaldson Motels, Inc. ESOP and, the Azon Corporation ESOP.

Mr. Barton has also been involved in a number of cases involving breaches of fiduciary duty and self-dealing, including improperly investing 401k plan assets in artificially inflated stock of publicly traded companies, in improper and risky investments such as hedge funds or private equity. Mr. Barton litigated one of the earliest cases challenging the prudence of investment and fees of the pension and 401k plans sponsored by New York Life Insurance Company.

Mr. Barton has also litigated cases involving the failure to properly pay benefits. In *Slipchenko v. Brunel*, No. 4-11-cv-01465 (S.D.

Tex.), Mr. Barton obtained a settlement in a COBRA class action which resulted in the largest per class-member recovery in any reported COBRA class action. In *Simpson v. Fireman's Fund Insurance Company* (N.D. Cal.), Mr. Barton represented a class employees alleging that FFIC's policy of terminated persons on disability violated the discrimination provisions of ERISA, and obtained a settlement restoring their right to benefits for a period of years and also reimbursement of past expenses.

### **Notable Cases Involving Veterans & Servicemembers**

In cases involving the rights of veterans and servicemembers, Mr. Barton is proud to have achieved results which one court described as "outstanding, worthy of being emulated by class representatives and counsel in other comparable litigation." In that case, *Tuten v. United Airlines*, No. 12-cv-1561-WJM-MEH (D. Col.), Mr. Barton was lead counsel for a class of United Airlines Pilots alleging USERRA violations in connection with their pension contributions. The case was settled for an amount that provided the Class with 100% of their actual damages. In *Bush v. Liberty Life Assurance Co.*, Mr. Barton was lead class counsel on behalf of a class participants whose long term disability benefits were insured by Liberty Life alleging that those benefits should not have been reduced by the amount of benefits provided through the Department of Veterans Affairs. As part of the settlement, Liberty Life agreed to return 60% of the monies imposed as offsets and to cease imposing such reductions/offsets unless and until the state departments of insurance had approved them.

### **Pro Bono Cases**

Mr. Barton considers pro bono representation an important part of his practice and has represented clients in actions concerning their employer's failure to pay wages and/or overtime. In one such case, the Judge in D.C. Superior Court described Mr. Barton's representation as follows: "everything done on behalf of the Plaintiff has been professional, timely and thorough."

## EDUCATION

- ❖ University of Michigan Law School, J.D., *cum laude*
- ❖ Babson College, B.S., Business Administration

## BAR ADMISSIONS

- ❖ Massachusetts
- ❖ California

## COURT ADMISSIONS

- ❖ District of Massachusetts
- ❖ Northern District of California
- ❖ Central District of California

## PROFESSIONAL CERTIFICATIONS

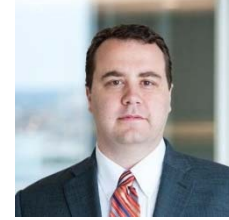
- ❖ Certified Information Privacy Professional (CIPP/US)

## PUBLICATIONS

- ❖ Co-author, PLI's Securities Litigation treatise – chapters on loss causation and securities trials

## JACOB WALKER

Senior Associate  
Tel. 617-398-5600  
Fax. 617-507-6020  
Email. [jake@blockesq.com](mailto:jake@blockesq.com)



Prior to joining Block & Leviton, Mr. Walker was an associate at two of the country's top defense firms, Gibson Dunn and Skadden Arps. Mr. Walker has represented boards of directors, corporate acquisition targets, and acquirers in litigation related to mergers and acquisitions. For example, he represented defendants in litigation related to the \$5.3 billion private equity acquisition of Del Monte Foods Company in state and federal courts in California and Delaware, as well as in litigation related to Intel's \$7.7 billion acquisition of McAfee Inc. in the Superior Court of California. He has also represented numerous third-parties, including various investment banks, in M&A litigation in California and Delaware courts.

In addition, Mr. Walker has represented several large technology companies, including in the defense of consumer class actions related to privacy and technology issues. He is a Certified Information Privacy Professional and has a deep understanding of technology and privacy issues. Mr. Walker has also represented companies in antitrust class actions and investigations, stockholder derivative actions, securities class actions, and in investigations before the F.T.C. and the Massachusetts Attorney General's office.

Mr. Walker represents the Louisiana Municipal Police Employees' Retirement System in *In re Onyx Pharmaceuticals Inc. Shareholder Litigation*, case no. CIV523789 (Cal. Sup. Ct.), a matter arising out of Onyx's \$11 billion dollar merger with Amgen (settled for \$30 million). Mr. Walker is also part of a team of Block & Leviton attorneys conducting work on behalf of consumer plaintiffs in the VW diesel engine litigation, case no. 3:15-md-02672 (N.D. Cal.) (initial settlement valued at over \$15 billion). Mr. Walker also represents lead plaintiffs in securities class actions against Amicus Therapeutics (D. N.J.) and Global Power Equipment Corporation (N.D. Tex.), and in litigation related to the \$4 billion private equity take-out of Life Time Fitness, Inc., case no. 15-cv-01911 (D. Minn.).

As part of his pro bono practice, Mr. Walker was part of a team of attorneys who represented Indian workers illegally trafficked to the Gulf Coast. Claims against the company have been proposed to be settled for over \$20 million as part of a pending bankruptcy case. Mr. Walker has also been recognized by the American Bar Association for his pro bono work on behalf of active duty military members and for his work teaching financial literacy skills to Boston-area high school students.

**EDUCATION**

- ❖ University of California  
Berkeley School of Law, J.D.
- ❖ University of California,  
Berkeley, B.A., Philosophy  
and Mathematics

**BAR ADMISSION**

- ❖ California

**VINCENT CHENG**

Senior Associate  
Tel. 415 968-8999  
Fax. 617-507-6020  
Email. [vincent@blockesq.com](mailto:vincent@blockesq.com)

Vincent Cheng joined Block & Leviton LLP in January 2017. He is an associate at the firm and a member of the Employee Benefits Group and Veterans/Servicemember Rights Group.

Since graduating from law school, Mr. Cheng has focused his work on advocating for the employment and employee benefits rights of employees and retirees and of veterans. Prior to joining Block & Leviton in January 2017, he was actively involved in a variety of class action lawsuits brought under the Employee Retirement Income Security Act (ERISA) involving breach of fiduciary duty and benefit denial claims, as well as cases brought under the Uniformed Services Employment and Reemployment Rights Act (USERRA) involving veterans rights and benefits.



## EDUCATION

- ❖ Harvard Law School, J.D., *cum laude*
- ❖ Wilfrid Laurier University, B.A., Political Science *with high distinction*

## JOEL A. FLEMING

Associate  
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Fax. 617-507-6020  
Email. joel@blockesq.com



## BAR ADMISSIONS

- ❖ California
- ❖ Massachusetts

## COURT ADMISSIONS

- ❖ Ninth Circuit
- ❖ First Circuit
- ❖ Northern District of California
- ❖ Central District of California
- ❖ District of Massachusetts

## PUBLICATIONS

- ❖ Co-author, *Decision Re-Affirms Critical Role of Shareholders*, Benefits and Pensions Monitor (October 2014)
- ❖ Co-author, *Meltdowns crank up muni-bond litigation*, Daily Journal (September 18, 2013)
- ❖ Co-author, *SEC takes hard line on 'cyber incidents'*, Daily Journal (April 5, 2013)
- ❖ Co-author, *Lower Courts Interpret The Supreme Court's Decision In Janus Capital Group, Inc. v. First Derivative Traders*, Financial Fraud Law Report 4:5 (May 2012)

## PROFESSIONAL ACTIVITIES

- ❖ Visiting Lecturer, Tufts University: Experimental College (2013-Present)

Block & Leviton Associate Joel Fleming has significant experience in securities and other complex litigation. Mr. Fleming is currently the lead associate for Block & Leviton in *Bessler v. Zafgen, Inc.*, 1:15-cv-13618-FDS (D. Mass.), in which the firm is acting as co-lead counsel for a putative class of shareholders alleging securities fraud in connection with material omissions regarding Zafgen's clinical trials of its lead drug candidate, beloranib.

Mr. Fleming also serves as the lead associate challenging Reynolds' conflicted transaction with its controlling shareholder, British American Tobacco, in connection with its purchase of Lorillard Inc. for \$27.4 billion and as the lead associate for a putative class of Charter Communications shareholders, challenging an unfair share issuance to Charter's controlling shareholders, Liberty Broadband and John Malone, in connection with Charter's purchase of Time Warner Cable and Bright House Networks. *Corwin v. British Am. Tobacco, et al.*, 14 CVS 8130 (N.C. Sup.) and *Sciabacucchi v. Liberty Broadband Corp., et al.*, No. 11418-VCG (Del. Ch.).

Mr. Fleming was the lead associate in *Vladimir Gusinsky Living Trust v. Berman*, No. 2:14-01420-JAK (C.D. Cal.), a derivative action on behalf of Jakks Pacific, Inc., which was resulted in a pending settlement that would impose significant corporate governance reforms, valued by expert testimony as worth \$20 to \$40 million to the company.

Prior to joining the firm, Mr. Fleming was a member of the Securities Litigation and Enforcement group at Wilmer Cutler Pickering Hale and Dorr—a large defense firm headquartered in Boston and Washington, D.C. While at WilmerHale, Mr. Fleming served as a member of the trial team in *AATI v. Skyworks*, the first-ever arbitration to go to trial before the Delaware Chancery Court, in a case involving a merger-related dispute between two companies in the high technology industry. Mr. Fleming represented both companies in a subsequent shareholder class action that ended with the dismissal with prejudice of all counts. Mr. Fleming also served as a trial team member representing the Public Service Department of the State of Vermont in a contested proceeding involving the proposed relicensing of the Vermont Yankee nuclear plant.

## EDUCATION

- ❖ Northeastern University School of Law, J.D.
- ❖ Vanderbilt University, B.A., Economics & Corporate Strategy

## ERICA G. LANGSEN

Associate  
Tel. 617-398-5600  
Fax. 617-507-6020  
Email. erica@blockesq.com



## BAR ADMISSIONS

- ❖ Massachusetts

## COURT ADMISSIONS

- ❖ District of Massachusetts
- ❖ Eleventh Circuit Court of Appeals

## PROFESSIONAL ACTIVITIES

- ❖ American Bar Association
- ❖ Women's Bar Association
- ❖ National Association of Public Pension Attorneys

Ms. Langsen is an associate at Block & Leviton where her practice focuses on antitrust, securities and employment class action litigation. Ms. Langsen is an integral member of a team of attorneys litigating the antitrust class action *In re Domestic Drywall Antitrust Litigation*, case no. 13-md-02437 (E.D.Pa.), recovering more than \$10 million on behalf of the class to date. The litigation is ongoing against the remaining four defendants. Ms. Langsen also represents the City of Providence in an antitrust class action against Celgene Corp. (*In re Thalomid and Revlimid Antitrust Litig.*, case no. 14-cv-06997 (D.N.J)), which alleges that Celgene unlawfully excluded generic competition for vital cancer treatment drugs. Ms. Langsen is also part of a team of attorneys conducting work on behalf of plaintiffs in *In re Packaged Seafood Antitrust Litig.*, 15-md-02670 (S.D.Cal.) (alleging price fixing in the market for shelf-stable seafood products) and *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and price fixing in the market for aluminum sulfate).

Ms. Langsen, who is a member of the Firm's New Case Investigation and Portfolio Monitoring Team, has also represented numerous classes of investors asserting various securities claims. For example, she is currently litigating *In re BP plc Securities Litigation*, case no. 4:10-md-02185 (S.D.Tex.), *In re EZCORP, Inc. Securities Litigation*, No. 1:15-cv-00608 (W.D.Tex.) and *Budde v. Global Power Equipment Inc. et al.*, 3:15-cv-02120 (N.D. Tex.), and was part of a team of attorneys who recovered favorable settlements for investors in the securities class actions *In re Cybex Int'l*, case no. 653794/2012 (merger premium increased by over 10%), and *In re Swisher Hygiene, Inc.*, case no. 3:12-MD-2384-GCM (settlement of \$5.5 million).

In addition, Ms. Langsen is a member of the Firm's Employment Litigation Team, where she has represented tradesmen seeking unpaid employment benefits and other damages from national and multi-national retailers. She recovered a significant settlement (\$6.5 million) in favor of a class of California installers in *Shephard v. Lowe's HIW, Inc.*, case no. 12-cv-03893 (N.D.Cal.).

Before joining Block & Leviton, Ms. Langsen was one of three Northeastern University School of Law students selected for an internship with the S.E.C., Enforcement Division.

## EDUCATION

- ❖ Washington University in Saint Louis School of Law, J.D. (Dean's List)
- ❖ Metropolitan State University of Denver, B.A., History

## BAR ADMISSIONS

- ❖ Massachusetts
- ❖ Illinois
- ❖ Missouri

## COURT ADMISSIONS

- ❖ District of Massachusetts
- ❖ Southern District of Illinois

## BRADLEY VETTRAINO

Associate

Tel. 617-398-5600

Fax. 617-507-6020

Email. [bradley@blockesq.com](mailto:bradley@blockesq.com)



Prior to joining Block & Leviton in 2015, Mr. Vettraino worked as an associate at both Bubalo Goode Sales & Bliss, and Maune Raichle Hartley French & Mudd.

Mr. Vettraino is experienced in all stages of complex civil litigation, including discovery and dispositive motion practice. In addition, he has worked on an array of complex civil matters, including products liability cases, consumer protection matters and business litigation in both state and federal courts.

In addition, Mr. Vettraino has experience managing and litigating over fifteen plaintiffs' toxic tort cases, securing favorable settlements in numerous matters. In addition, he successfully argued in opposition to a motion for summary judgment before a state court.

Mr. Vettraino is a member of the team representing the Ohio Public Employees' Retirement System in the securities class action *In re BP plc Sec. Litig.*, Case No. 4:10-md-02185 (S.D. Tex.), which recovered \$175 million to investors related to the explosion and subsequent massive oil spill in the Gulf of Mexico in 2010. Additionally, Mr. Vettraino is a member of the team representing a pension fund in the class action *In re Onyx Pharmaceuticals, Inc. Securities Litigation*, case no. CIV523789 (Cal. Sup. Ct.), in which a \$30 million settlement is pending and, if approved, will be the second largest post-close merger and acquisition settlement in California state court history. Mr. Vettraino also represents shareholders of Rentrak Corporation in a lawsuit currently pending in Oregon against the Company and its Board of Directors relating to the proposed acquisition of Rentrak Corporation by comScore. *See In re Rentrak Corporation Shareholders Litigation*, Case No. 15-cv-27429 (Ore. Cir. Ct.). Mr. Vettraino also represents Amalgamated Bank in a books and records action against Wal-Mart in Delaware Chancery Court and secured a key ruling against Wal-Mart on a motion to compel and for monetary sanctions.

Upon graduating from Washington University in St. Louis, Mr. Vettraino received the Dan Carter-Earl Tedrow Memorial Award, an award given to the student who most exemplifies the aims of the legal profession. Mr. Vettraino also served as an Executive Board Member and Primary Editor of the Global Studies Law Review.

## EDUCATION

- ❖ Duke Law School, J.D., L.L.M., *magna cum laude* & Order of the Coif
- ❖ Columbia University, B.A., History

## MATTHEW SMITH

Associate  
Tel. 415-968-8992  
Fax. 617-507-6020  
Email. matt@blockesq.com

## BAR ADMISSIONS

- ❖ New York
- ❖ District of Columbia
- ❖ California

Matt is an Associate in the Firm's Antitrust and Employee Benefits practices. After graduating *magna cum laude* from Duke Law School, Matt served as a law clerk to the Honorable Rosemary Barkett on the Eleventh Circuit Court of Appeals.

## COURT ADMISSIONS

- ❖ Second and Third Circuit Courts of Appeals
- ❖ Eastern District of Michigan
- ❖ District of Colorado
- ❖ Northern and Central Districts of California

Before joining Block and Leviton, Matt practiced at nationally-recognized plaintiff's firms based in Washington, D.C., and Seattle, Washington, where his practice concentrated on antitrust and employee benefits cases. Matt collaborated with R. Joe Barton in *Severstal Wheeling, Inc. Retirement Committee et al. v. WPN Corp., et al.* (2d. Circuit). As part of a two-attorney trial team, they won a \$15 million judgment on behalf of thousands of retired steelworkers. Matt has valuable experience serving as lead associate in a myriad of successful litigation, ranging from cases where military veterans were wrongfully denied long-term disability benefits (*Bush v. Liberty Life Assurance Co. of Boston et al.* (N.D. Cal.)), to nationally-contested issues of federal pension regulation (*Kaplan v. Saint Peter's Healthcare System, et al.* (3d Circuit)).

Currently, Matt represents the City of Providence in an antitrust class action against Celgene Corporation (*In re Thalomid and Revlimid Antitrust Litig.*, case no. 14-cv-06997 (D.N.J)), which alleges that Celgene unlawfully excluded generic competition for vital cancer treatment drugs. He is also part of a team of attorneys working on behalf of plaintiffs in *In re Packaged Seafood Antitrust Litig.*, 15-md-02670 (S.D.Cal.) (alleging price-fixing in the market for shelf-stable seafood products), *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and pricefixing in the market for aluminum sulfate), and *In re Broiler Chicken Antitrust Litig.*, No. 1:16-cv-08637 (N.D. Ill.).

Matt has maintained an active pro bono practice including advising the Sierra Club's Environmental Law Program on antitrust and competition policy issues concerning the nation's energy infrastructure, and representing an applicant to serve as chaplain in the United States Navy.

A recent California transplant, Matt enjoys spending his free time hiking in Los Padres National Forest with his three-year old Brittany Spaniel.

**EDUCATION**

- ❖ Suffolk University Law School, J.D.
- ❖ Sawyer Business School, Suffolk University, M.B.A.
- ❖ Connecticut College, B.A., Economics

**BAR ADMISSIONS**

- ❖ Massachusetts

**JEFFREY GRAY**

Associate  
Tel. 617-398-5600  
Fax. 617-507-6020  
Email. [jgray@blockesq.com](mailto:jgray@blockesq.com)

Mr. Gray joined Block & Leviton as an associate in 2016, where his practice focuses on consumer class action litigation. Mr. Gray is experienced in conducting large scale document review projects.

Mr. Gray is a member of the Block & Leviton LLP litigation team representing members of the class in the matter Volkswagen “Clean Diesel” MDL. Prior to joining Block & Leviton, Mr. Gray also received valuable experience with class action shareholder suits, breach of contract cases, and defense of trademark infringement claims, as well as SEC and DOJ investigations of pharmaceutical companies and hedge funds.

Earlier in his career, Mr. Gray was a management consultant at a financial services firm in the Boston area and, prior to that, was a project manager in commercial lending at FleetBoston Financial. While in law school, he completed internships with MFS and with The Nature Conservancy and was a law clerk at CT Corporation System.

# **EXHIBIT B**

**EXHIBIT B**

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

Firm Name: **Block & Leviton 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
Jeff Block (P)											0.50				0.50	\$825.00	\$412.50
NameWhitney Street			0.50				1.80	0.25	4.85		11.35				18.75	\$715.00	\$13,406.25
Lesley Weaver (P)			14.60		109.00	9.50	34.10	0.30	8.60	9.30	38.40	0.60			224.40	\$725.00	\$162,690.00
Mili Desai (A)	13.80		12.10		40.70	2.10	13.30	14.80	3.00	54.70	5.10				159.60	\$575.00	\$91,770.00
Leigh O'Neil (A)			6.40				237.80		2.60		51.00				297.80	\$395.00	\$117,631.00
Erica Langsen (Sorg) (A)	5.10														5.10	\$525.00	\$2,677.50
Daniel Fishman											14.70				14.70	\$185.00	\$2,719.50
Kasey Sullivan							3.10								3.10	\$350.00	\$1,085.00
Yunah Rah		12.00	16.00		14.00		637.40		8.90	30.10	1.00				719.40	\$395.00	\$284,163.00
Britt Cabulka							36.00		2.50						38.50	\$350.00	\$13,475.00
<b>SUB-TOTAL</b>	<b>18.90</b>	<b>12.00</b>	<b>49.60</b>	<b>0.00</b>	<b>163.70</b>	<b>11.60</b>	<b>963.50</b>	<b>15.35</b>	<b>30.45</b>	<b>94.10</b>	<b>122.05</b>	<b>0.60</b>	<b>0.00</b>	<b>0.00</b>	<b>1481.85</b>		<b>\$690,029.75</b>

NON-ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Julie Ledwig (PL)		1.50	0.60					5.85			15.15				31.85	\$225.00	\$7,166.25

<b>SUB-TOTAL</b>	<b>0.00</b>	<b>1.50</b>	<b>0.60</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>5.85</b>	<b>0.00</b>	<b>0.00</b>	<b>15.15</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>31.85</b>		<b>\$7,166.25</b>
<b>GRAND TOTAL:</b>	<b>18.90</b>	<b>13.50</b>	<b>50.20</b>	<b>0.00</b>	<b>163.70</b>	<b>11.60</b>	<b>963.50</b>	<b>21.20</b>	<b>30.45</b>	<b>94.10</b>	<b>137.20</b>	<b>0.60</b>	<b>0.00</b>	<b>0.00</b>	<b>1513.70</b>		<b>\$697,196.00</b>

# **EXHIBIT C**



**EXHIBIT C**

In re Lithium Ion Batteries Antitrust Litigation

**BLOCK & LEVITON LLP**

<b><u>ATTORNEYS</u></b>	<b><u>DATE RANGE</u></b>	<b><u>HOURLY RATE</u></b>
Jeffrey Block	Starting January 2017	\$825.00
Jeffrey Block	2013 – 2016	\$795.00
Whitney Street	Starting January 2017	\$715.00
Whitney Street	Starting January 2016	\$675.00
Whitney Street	2013 – 2015	\$595.00
Lesley Weaver	Starting January 2016	\$725.00
Lesley Weaver	2015	\$650.00
Mili Desai		\$575.00
Leigh O’Neil (for Doc. Review tasks)		\$350.00
Leigh O’Neil	Starting in January 2014	\$395.00
Leigh O’Neil	June 2013 – Dec. 2013	\$325.00
Erica Langsen (Sorg)	Starting January 2017	\$525.00
Erica Langsen (Sorg)	2013 – 2016	\$350.00
Daniel Fishman		\$185.00
Kasey Sullivan		\$350.00
Yunah Rha		\$395.00
Britt Cibulka		\$350.00
<b><u>NON-ATTORNEYS</u></b>	<b><u>DATE RANGE</u></b>	<b><u>HOURLY RATE</u></b>
Julie Ledwig		\$225.00

# **EXHIBIT D**

**(REDACTED)**

**Block & Leviton LLP - User Time and Lodestar Summary**

Date Start: 6/1/2013 | Date End: 12/31/2013 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
<b>Leigh O'Neil</b>								
07/30/2013	Lithium Ion Batteries	Batteries	Draft letters to clients regarding executed copies of retainers	(11) Litigation Strategy, Analysis & Case Management	\$325.00 hr	2.20	2.20	\$715.00
					<b>Total Labor For Leigh O'Neil</b>	<b>2.20</b>	<b>2.20</b>	<b>\$715.00</b>
<b>Whitney Street</b>								
06/11/2013	Lithium Ion Batteries	Batteries	Conference calls regarding Illinois plaintiff, Brad Marcus.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
06/12/2013	Lithium Ion Batteries	Batteries	Conference calls with co-counsel and client's employer, J. Kessler; follow up call and emails re: same.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.50	0.50	\$297.50
06/20/2013	Lithium Ion Batteries	Batteries	Follow-up regarding B. Marcus.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
06/30/2013	Lithium Ion Batteries	Batteries	Follow-up with co-counsel regarding confidentiality agreements; call re: same.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.30	0.30	\$178.50
07/02/2013	Lithium Ion Batteries	Batteries	Follow-up regarding confidentiality agreements; discuss case status with team.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
07/16/2013	Lithium Ion Batteries	Batteries	Draft email to client.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
07/26/2013	Lithium Ion Batteries	Batteries	Follow-up on request from co-counsel regarding 93A letters; review filings regarding amended complaints and motions to dismiss.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$595.00 hr	0.80	0.80	\$476.00
07/27/2013	Lithium Ion Batteries	Batteries	Research follow-up request from co-counsel regarding 93A letters; draft response re: same.	(3) Drafting Discovery Answers/Responses	\$595.00 hr	0.50	0.50	\$297.50
07/29/2013	Lithium Ion Batteries	Batteries	Follow-up regarding retainers and questionnaires.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
07/30/2013	Lithium Ion Batteries	Batteries	Draft email to client regarding role in case; conference call with counsel regarding retainer letters; confer with L. O'Neil re: same.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.30	0.30	\$178.50
08/05/2013	Lithium Ion Batteries	Batteries	Draft letter to B. Martinez; review recent court submissions and update files accordingly.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$595.00 hr	0.50	0.50	\$297.50
08/12/2013	Lithium Ion Batteries	Batteries	Review letter briefs filed by defendants and IPP and DPP responses thereto.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$595.00 hr	1.00	1.00	\$595.00
08/14/2013	Lithium Ion Batteries	Batteries	Review proposed order and emails; call with co-counsel re: case status and developments.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$595.00 hr	0.30	0.30	\$178.50
09/17/2013	Lithium Ion Batteries	Batteries	Review and file recent submissions to the court.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$595.00 hr	0.25	0.25	\$148.75
11/07/2013	Lithium Ion Batteries	Batteries	Review recent submissions to the court.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$595.00 hr	0.10	0.10	\$59.50
12/01/2013	Lithium Ion Batteries	Batteries	Review Kessler letter to the court regarding proposed agenda; email L. Weaver re: same.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$595.00 hr	0.25	0.25	\$148.75
12/09/2013	Lithium Ion Batteries	Batteries	Call with L. Weaver re: update on the hearing.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
					<b>Total Labor For Whitney Street</b>	<b>6.20</b>	<b>6.20</b>	<b>\$3,689.00</b>
<b>Grand Total Labor</b>						<b>8.40</b>	<b>8.40</b>	<b>\$4,404.00</b>

**Block & Leviton LLP - User Time and Lodestar Summary**

Date Start: 1/1/2014 | Date End: 12/31/2014 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
<b>Julie Ledwig</b>								
12/11/2014	Lithium Ion Batteries	Batteries	Calendar motion deadlines.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
12/23/2014	Lithium Ion Batteries	Batteries	Research CA Rules regarding Notice of Change of Address; begin drafting Notice for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.90	0.90	\$202.50
12/24/2014	Lithium Ion Batteries	Batteries	Draft Notice of Change of Address for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.40	0.40	\$90.00
12/29/2014	Lithium Ion Batteries	Batteries	Revise notice change of address.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.40	0.40	\$90.00
<b>Total Labor For Julie Ledwig</b>						<b>1.90</b>	<b>1.90</b>	<b>427.50</b>
<b>Leigh O'Neil</b>								
01/30/2014	Lithium Ion Batteries	Batteries	Calculate and update 2013 time and expense chart	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.90	1.90	\$750.50
01/31/2014	Lithium Ion Batteries	Batteries	Revise and submit 2013 time and expense sheets broken down by month	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	3.90	3.90	\$1,540.50
05/30/2014	Lithium Ion Batteries	Batteries	Discuss case status with WES	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
06/01/2014	Lithium Ion Batteries	Batteries	Review coding manual	(7) Document Review	\$350.00 hr	1.10	1.10	\$385.00
06/02/2014	Lithium Ion Batteries	Batteries	Review coding manual and pleadings	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcrip	\$395.00 hr	1.20	1.20	\$474.00
06/04/2014	Lithium Ion Batteries	Batteries	Catalyst Document Review Training	(7) Document Review	\$350.00 hr	1.30	1.30	\$455.00
06/09/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT0000001-429]; review coding manual	(7) Document Review	\$350.00 hr	2.40	2.40	\$840.00
06/11/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00000459-644]	(7) Document Review	\$350.00 hr	3.30	3.30	\$1,155.00
06/12/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00000644N-812]	(7) Document Review	\$350.00 hr	1.30	1.30	\$455.00
06/13/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00000816-994]	(7) Document Review	\$350.00 hr	4.10	4.10	\$1,435.00
06/15/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00001006-1132]	(7) Document Review	\$350.00 hr	2.70	2.70	\$945.00
06/16/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00001132N-18880]	(7) Document Review	\$350.00 hr	6.30	6.30	\$2,205.00
06/17/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00018880N-19167]	(7) Document Review	\$350.00 hr	5.80	5.80	\$2,030.00
06/18/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00019174-19375N]	(7) Document Review	\$350.00 hr	4.10	4.10	\$1,435.00
06/20/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00019382-19580]	(7) Document Review	\$350.00 hr	6.90	6.90	\$2,415.00
06/24/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00019582-19700]	(7) Document Review	\$350.00 hr	1.80	1.80	\$630.00
06/28/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00040526-40550]	(7) Document Review	\$350.00 hr	2.40	2.40	\$840.00

06/30/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00040552-40581]	(7) Document Review	\$350.00 hr	4.20	4.20	\$1,470.00
07/01/2014	Lithium Ion Batteries	Batteries	Review NEC documents; document review conference call [NECT000040582-40646]	(7) Document Review	\$350.00 hr	4.60	4.60	\$1,610.00
07/10/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00040647-40675]	(7) Document Review	\$350.00 hr	8.10	8.10	\$2,835.00
07/11/2014	Lithium Ion Batteries	Batteries	Review NEC and Panasonic documents for evidence of conspiracy [NECT00040676-40692; P-D(	(7) Document Review	\$350.00 hr	5.80	5.80	\$2,030.00
07/14/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0002846-14775]	(7) Document Review	\$350.00 hr	7.10	7.10	\$2,485.00
07/15/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0014780-24814]	(7) Document Review	\$350.00 hr	8.40	8.40	\$2,940.00
07/16/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0024819-28555]	(7) Document Review	\$350.00 hr	8.40	8.40	\$2,940.00
07/17/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0028576-32363]	(7) Document Review	\$350.00 hr	8.30	8.30	\$2,905.00
07/21/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0032364-32832]	(7) Document Review	\$350.00 hr	8.20	8.20	\$2,870.00
07/22/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0032833-35085]	(7) Document Review	\$350.00 hr	8.10	8.10	\$2,835.00
07/23/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0035086-47990]	(7) Document Review	\$350.00 hr	5.10	5.10	\$1,785.00
07/24/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0047991-49393]	(7) Document Review	\$350.00 hr	5.20	5.20	\$1,820.00
07/25/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0049394-49496]	(7) Document Review	\$350.00 hr	8.10	8.10	\$2,835.00
07/28/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0049467-52875]	(7) Document Review	\$350.00 hr	8.20	8.20	\$2,870.00
07/29/2014	Lithium Ion Batteries	Batteries	Review coding manual; review Panasonic documents for evidence of conspiracy [P-DOJ0052876-58785]	(7) Document Review	\$350.00 hr	8.10	8.10	\$2,835.00
07/30/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0058786-58843]	(7) Document Review	\$350.00 hr	7.20	7.20	\$2,520.00
07/31/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0058844-61700]	(7) Document Review	\$350.00 hr	7.20	7.20	\$2,520.00
08/01/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0061925-78329]	(7) Document Review	\$350.00 hr	5.10	5.10	\$1,785.00
08/04/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0078343-80084]	(7) Document Review	\$350.00 hr	2.70	2.70	\$945.00
08/06/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0080092-84157]	(7) Document Review	\$350.00 hr	1.20	1.20	\$420.00
08/07/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0084888-95000N]	(7) Document Review	\$350.00 hr	7.50	7.50	\$2,625.00
08/08/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0095005-96183]	(7) Document Review	\$350.00 hr	6.70	6.70	\$2,345.00
08/14/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0098489-102920]	(7) Document Review	\$350.00 hr	5.10	5.10	\$1,785.00
08/17/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0103007-103428]	(7) Document Review	\$350.00 hr	1.30	1.30	\$455.00
08/18/2014	Lithium Ion Batteries	Batteries	01034Review Panasonic documents for evidence of conspiracy. [P-DOJ103432-113682]	(7) Document Review	\$350.00 hr	3.10	3.10	\$1,085.00
08/19/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ1113684-114024]	(7) Document Review	\$350.00 hr	4.10	4.10	\$1,435.00
08/20/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy P-DOJ0114102-122596]	(7) Document Review	\$350.00 hr	6.70	6.70	\$2,345.00

08/21/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0122597-123302]	(7) Document Review	\$350.00 hr	8.10	8.10	\$2,835.00
08/22/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0123303-128948]	(7) Document Review	\$350.00 hr	7.40	7.40	\$2,590.00
08/27/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0128948N-129101]	(7) Document Review	\$350.00 hr	2.10	2.10	\$735.00
08/28/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy. [P-DOJ0129107-132509N]	(7) Document Review	\$350.00 hr	2.50	2.50	\$875.00
09/30/2014	Lithium Ion Batteries	Batteries	Review team conference call; review updated coding manual	(7) Document Review	\$350.00 hr	0.90	0.90	\$315.00
10/02/2014	Lithium Ion Batteries	Batteries	Review Sony documents for evidence of conspiracy [SONY-LIB-000023623-23627]	(7) Document Review	\$350.00 hr	2.40	2.40	\$840.00
<b>Total Labor For Leigh O'Neil</b>						<b>238.00</b>	<b>238.00</b>	<b>\$83,628.50</b>

**Whitney Street**

01/22/2014	Lithium Ion Batteries	Batteries	Review recent submissions to the court and the court's order re: the motions to dismiss; confer with co-counsel and team re: same.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts	\$595.00 hr	1.20	1.20	\$714.00
01/23/2014	Lithium Ion Batteries	Batteries	Review case status; conference call with L. Weaver re: same.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
01/28/2014	Lithium Ion Batteries	Batteries	Review email from liaison counsel	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.10	0.10	\$59.50
02/07/2014	Lithium Ion Batteries	Batteries	Email team re: clients.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.30	0.30	\$178.50
02/09/2014	Lithium Ion Batteries	Batteries	Review email from L. Weaver regarding products; review letter to court; follow-up with team regarding state representatives.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.30	0.30	\$178.50
02/11/2014	Lithium Ion Batteries	Batteries	Retainer; confer with L. Weaver re: client development and case status.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.50	0.50	\$297.50
02/12/2014	Lithium Ion Batteries	Batteries	Conference call with L. Weaver; review documents and correspondence; draft email to co-lead counsel re: state representatives; follow-up emails with L. Weaver re: same.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	1.30	1.30	\$773.50
02/13/2014	Lithium Ion Batteries	Batteries	Retainer agreement.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
02/21/2014	Lithium Ion Batteries	Batteries	Follow-up regarding client development efforts (Montana and Utah).	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
02/28/2014	Lithium Ion Batteries	Batteries	Follow-up with team re: client development efforts.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
04/01/2014	Lithium Ion Batteries	Batteries	Review recent submissions; follow-up re: receipts for Montana and Utah clients.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
05/27/2014	Lithium Ion Batteries	Batteries	Review recent submissions to the court and orders	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	1.00	1.00	\$595.00
05/27/2014	Lithium Ion Batteries	Batteries	confer with L. Weaver regarding case status and strategy	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	1.00	1.00	\$595.00
05/27/2014	Lithium Ion Batteries	Batteries	draft client update memo	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.40	0.40	\$238.00
05/27/2014	Lithium Ion Batteries	Batteries	confer with J. Block and J. Leviton re: staffing.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
05/28/2014	Lithium Ion Batteries	Batteries	Conference call with co-counsel re: client update; review/organize opposition briefs.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.30	0.30	\$178.50
05/29/2014	Lithium Ion Batteries	Batteries	Finalize client update memos.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.50	0.50	\$297.50
05/30/2014	Lithium Ion Batteries	Batteries	Email clients with status report	(7) Document Review	\$595.00 hr	0.80	0.80	\$476.00
05/30/2014	Lithium Ion Batteries	Batteries	Assist L. O'Neil with locating operative documents to prepare for document review; begin reviewing same.	(7) Document Review	\$595.00 hr	1.00	1.00	\$595.00

06/03/2014	Lithium Ion Batteries	Batteries	Client update.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
06/12/2014	Lithium Ion Batteries	Batteries	Update status memo and transmit to clients; review CMO and calendar dates.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
06/14/2014	Lithium Ion Batteries	Batteries	Resolve issue with client's email address; resend client update.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
12/08/2014	Lithium Ion Batteries	Batteries	Review recent order.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcrip	\$595.00 hr	0.40	0.40	\$238.00
<b>Total Labor For Whitney Street</b>						<b>11.15</b>	<b>11.15</b>	<b>\$6,634.25</b>
<b>Grand Total</b>						<b>251.05</b>	<b>251.05</b>	<b>\$90,690.25</b>

**Block & Leviton LLP - User Time and Lodestar Summary**

Date Start: 1/1/2015 | Date End: 12/31/2015 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
<b>Daniel Fishman</b>								
05/29/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	3.80	3.80	\$703.00
06/01/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	0.40	0.40	\$74.00
06/02/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	0.60	0.60	\$111.00
06/03/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	2.40	2.40	\$444.00
06/04/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	4.10	4.10	\$758.50
06/09/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	0.70	0.70	\$129.50
06/10/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	2.20	2.20	\$407.00
06/11/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$185.00 hr	0.50	0.50	\$92.50
<b>Total Labor For Daniel Fishman</b>						<b>14.70</b>	<b>14.70</b>	<b>\$ 2,719.50</b>
<b>Erica Langsen (née Sorg)</b>								
05/12/2015	Lithium Ion Batteries	Batteries	Research [REDACTED]	(1) Investigations, Factual Research	\$350.00 hr	5.10	5.10	\$1,785.00



<b>Total Labor For Erica Langsen</b>						<b>5.10</b>	<b>5.10</b>	<b>\$1,785.00</b>
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**Jeff Block**

08/27/2015	Lithium Ion Batteries	Batteries	Conf LEW re: case staffing and strategy	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.50	0.50	\$350.00
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<b>Total Labor For Jeff Block</b>						<b>0.50</b>	<b>0.50</b>	<b>\$350.00</b>
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**Julie Ledwig**

01/08/2015	Lithium Ion Batteries	Batteries	Revise notice of change of firm affiliation and address for L. Weaver, and register LW for ECF.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	1.00	1.00	\$225.00
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01/08/2015	Lithium Ion Batteries	Batteries	Register LW for ECF.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.10	0.10	\$22.50
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01/13/2015	Lithium Ion Batteries	Batteries	Revise change of address notice for L. Weaver to reflect new Oakland office location.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.10	0.10	\$22.50
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01/21/2015	Lithium Ion Batteries	Batteries	Revise change of address notice for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.20	0.20	\$45.00
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01/28/2015	Lithium Ion Batteries	Batteries	Update pleadings index.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
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02/13/2015	Lithium Ion Batteries	Batteries	Calendar upcoming events/deadlines.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.70	0.70	\$157.50
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03/11/2015	Lithium Ion Batteries	Batteries	Calendar court deadlines.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
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03/13/2015	Lithium Ion Batteries	Batteries	Finalize and efile Notice of Change of Address for L. Weaver	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.40	0.40	\$90.00
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04/23/2015	Lithium Ion Batteries	Batteries	Calendar discovery deadlines; search for preservation letter and e-mails to/from L. Weavery regarding same.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.30	0.30	\$67.50
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04/29/2015	Lithium Ion Batteries	Batteries	Draft shell RPD and ROG responses for both City of Richmond and Palo Alto clients	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	2.00	2.00	\$450.00
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04/29/2015	Lithium Ion Batteries	Batteries	Save client documents to the system; e-mails from/to L. Weaver, L. O'Neil regarding same.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.30	0.30	\$67.50
04/30/2015	Lithium Ion Batteries	Batteries	Revise Response to Defendants' RPDs.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.30	0.30	\$67.50
05/06/2015	Lithium Ion Batteries	Batteries	Case management of incoming client documents and prepare same for production.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	2.00	2.00	\$450.00
05/07/2015	Lithium Ion Batteries	Batteries	Bates label production documents and stamp confidential; e-mails from/to L. Weaver regarding same.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.70	0.70	\$157.50
05/08/2015	Lithium Ion Batteries	Batteries	Revise Palo Alto Production; emails from/to L. Weaver regarding same; save written discovery to the system.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.40	0.40	\$90.00
05/18/2015	Lithium Ion Batteries	Batteries	Finalize and electronically serve Interrogatory Responses and Richmond production documents to all parties; e-mails to/from L. Weaver regarding same.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	1.80	1.80	\$405.00
05/27/2015	Lithium Ion Batteries	Batteries	Save incoming Palo Alto documents to the system and emails from/to L. Weaver regarding production; bates stamp documents in preparation for June production.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.70	0.70	\$157.50
05/28/2015	Lithium Ion Batteries	Batteries	Prepare/finalize PaloAlto production documents and emails to/from L. Weaver, co-counsel regarding same.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	1.00	1.00	\$225.00
05/29/2015	Lithium Ion Batteries	Batteries	E-mails to/from co-counsel and L. Weaver regarding draft production documents; finalize production documents and revise Interrogatory responses.	(3) Drafting Discovery Answers/Responses	\$225.00 hr	0.60	0.60	\$135.00
06/09/2015	Lithium Ion Batteries	Batteries	Revise terms list discovery letter and e-mails to/from L. Weaver regarding same; finalize and serve letter upon all counsel via e-mail.	(2) Drafting Discovery Requests	\$225.00 hr	1.50	1.50	\$337.50
06/11/2015	Lithium Ion Batteries	Batteries	Case management of preservation letters and discovery.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.25	0.25	\$56.25
06/12/2015	Lithium Ion Batteries	Batteries	Update attorney service list.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
07/07/2015	Lithium Ion Batteries	Batteries	Draft time and expense report for June.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	1.75	1.75	\$393.75
07/31/2015	Lithium Ion Batteries	Batteries	Create 2nd quarter T&E report and e-mails to/from L. Weaver regarding same.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	1.70	1.70	\$382.50
08/03/2015	Lithium Ion Batteries	Batteries	Emails to/from J. Anderson, K. Good regarding time and expenses.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.10	0.10	\$22.50

09/01/2015	Lithium Ion Batteries	Batteries	Draft notice of change of address for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.15	0.15	\$33.75
09/10/2015	Lithium Ion Batteries	Batteries	Draft/revise and e-file Notice of Change of address for L. Weaver and W. Street; arrange with vendor for production/delivery of mandatory chambers copies.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.70	0.70	\$157.50
10/14/2015	Lithium Ion Batteries	Batteries	Bates/confidential stamp client documents in preparation for production to opposing counsel.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.90	0.90	\$202.50
10/16/2015	Lithium Ion Batteries	Batteries	Save finalized 10/14/2015 production documents to the system.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.10	0.10	\$22.50
10/16/2015	Lithium Ion Batteries	Batteries	Calendar upcoming briefing and hearing deadlines.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.40	0.40	\$90.00
11/09/2015	Lithium Ion Batteries	Batteries	Calendar upcoming hearing and filing deadline.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.15	0.15	\$33.75
12/03/2015	Lithium Ion Batteries	Batteries	Calendar upcoming hearing and briefing deadlines.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.30	0.30	\$67.50
<b>Total Labor For Julie Ledwig</b>						<b>21.20</b>	<b>21.20</b>	<b>\$ 4,770.00</b>

**Kasey Sullivan**

06/08/2015	Lithium Ion Batteries	Batteries	Training for batteries document review.	(7) Document Review	\$350.00 hr	0.60	0.60	\$210.00
06/09/2015	Lithium Ion Batteries	Batteries	Training for batteries document review.	(7) Document Review	\$350.00 hr	1.20	1.20	\$420.00
06/18/2015	Lithium Ion Batteries	Batteries	Training for batteries document review.	(7) Document Review	\$350.00 hr	1.20	1.20	\$420.00
07/02/2015	Lithium Ion Batteries	Batteries	Email with Yunah Rha re batteries document review.	(7) Document Review	\$350.00 hr	0.10	0.10	\$35.00
<b>Total Labor For Kasey Sullivan</b>						<b>3.10</b>	<b>3.10</b>	<b>\$ 1,085.00</b>

**Leigh O'Neil**

04/29/2015	Lithium Ion Batteries	Batteries	Draft RPD responses for Palo Alto	(3) Drafting Discovery Answers/Responses	\$395.00 hr	2.90	2.90	\$1,145.50
05/01/2015	Lithium Ion Batteries	Batteries	Draft Interrogatory Responses for Palo Alto and Richmond	(3) Drafting Discovery Answers/Responses	\$395.00 hr	3.50	3.50	\$1,382.50
05/05/2015	Lithium Ion Batteries	Batteries	Draft client verification forms; send discovery responses to LEW	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	1.40	1.40	\$553.00
05/19/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	8.10	8.10	\$3,199.50
05/20/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	3.90	3.90	\$1,540.50
06/02/2015	Lithium Ion Batteries	Batteries	Prepare spreadsheet documenting Richmond's purchases	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	3.10	3.10	\$1,224.50
06/11/2015	Lithium Ion Batteries	Batteries	compile document review materials	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.80	0.80	\$316.00
06/12/2015	Lithium Ion Batteries	Batteries	Review fraudulent concealment documents; update Richmond damages spreadsheet	(7) Document Review	\$350.00 hr	7.10	7.10	\$2,485.00
06/15/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	8.20	8.20	\$3,239.00
06/17/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	8.20	8.20	\$3,239.00
06/18/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	8.30	8.30	\$3,278.50
06/19/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	2.10	2.10	\$829.50
<b>Total Labor For Leigh O'Neil</b>						<b>57.60</b>	<b>57.60</b>	<b>\$22,432.50</b>

**Lesley Weaver**

04/02/2015	Lithium Ion Batteries	Batteries	Confer with client regarding request for waiver from Orrick firm to represent Sony; confer with co-lead counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.80	0.80	\$520.00
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04/17/2015	Lithium Ion Batteries	Batteries	Review and analyze correspondence from defendants re: written discovery; blonder with co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.60	0.60	\$390.00
04/18/2015	Lithium Ion Batteries	Batteries	Outline issues for discussion in written discovery propounded on public entities;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$650.00 hr	0.80	0.80	\$520.00
04/20/2015	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with co-counsel re strategy on responding to written discovery;	(6) Discovery Meet & Confer	\$650.00 hr	0.80	0.80	\$520.00
04/21/2015	Lithium Ion Batteries	Batteries	Confer with client re: preparation of responses to discovery;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.70	0.70	\$455.00
04/22/2015	Lithium Ion Batteries	Batteries	Review and analyze defendants' discovery responses; confer with co-lead counsel re: same;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$650.00 hr	1.60	1.60	\$1,040.00
04/23/2015	Lithium Ion Batteries	Batteries	Coordinate with client re: discovery requests and search for responsive documents;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.60	0.60	\$390.00
04/27/2015	Lithium Ion Batteries	Batteries	Coordinate re interviews of candidate speaking Japanese or Korean to assist with discovery;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.30	1.30	\$845.00
04/27/2015	Lithium Ion Batteries	Batteries	Coordinate with Palo Alto and Richmond re document collection and review for production; coordinate with SC at Renne Sloane re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.30	1.30	\$845.00
04/28/2015	Lithium Ion Batteries	Batteries	Coordinate with client and with steve Cikes re: responses to written discovery and collection of documents; Coordinate on site meetings; communicate with co-lead counsel re: same	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.90	1.90	\$1,235.00
04/29/2015	Lithium Ion Batteries	Batteries	Coordinate issues to be considered in impending document review;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.40	0.40	\$260.00
04/29/2015	Lithium Ion Batteries	Batteries	Review and revise draft discovery responses; coordinate with clients re: same;	(3) Drafting Discovery Answers/Responses	\$650.00 hr	1.60	1.60	\$1,040.00
04/30/2015	Lithium Ion Batteries	Batteries	Analyze defendants' discovery and outline objections; confer with LO re drafting responses;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$650.00 hr	0.80	0.80	\$520.00
05/04/2015	Lithium Ion Batteries	Batteries	Revise and send draft discovery to clients;	(3) Drafting Discovery Answers/Responses	\$650.00 hr	1.60	1.60	\$1,040.00
05/05/2015	Lithium Ion Batteries	Batteries	Confer with client re written discovery responses and next steps on verifications, etc; develop plan for additional document searches;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.30	1.30	\$845.00
05/06/2015	Lithium Ion Batteries	Batteries	Revise written discovery responses; develop strategy going forward; coordinate additional searches;	(3) Drafting Discovery Answers/Responses	\$650.00 hr	2.30	2.30	\$1,495.00

05/06/2015	Lithium Ion Batteries	Batteries	Receive and review document production from client; analyze same; coordinate production;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.50	1.50	\$975.00
05/07/2015	Lithium Ion Batteries	Batteries	Prepare for and attend meeting with Richmond re document collection and discovery responses;	(6) Discovery Meet & Confer	\$650.00 hr	2.60	2.60	\$1,690.00
05/07/2015	Lithium Ion Batteries	Batteries	Draft and revise interrogatory responses for Richmond; follow up on factual research for certain responses;	(3) Drafting Discovery Answers/Responses	\$650.00 hr	2.40	2.40	\$1,560.00
05/08/2015	Lithium Ion Batteries	Batteries	Coordinate re extension of time to respond; review and revise responses; prepare Richmond documents for production;	(3) Drafting Discovery Answers/Responses	\$650.00 hr	2.30	2.30	\$1,495.00
05/12/2015	Lithium Ion Batteries	Batteries	Coordinate research re impact of autos decision in batteries case;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.40	1.40	\$910.00
05/14/2015	Lithium Ion Batteries	Batteries	Coordinate with co-counsel re extension on time to respond;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.30	0.30	\$195.00
05/17/2015	Lithium Ion Batteries	Batteries	Prepare documents and responses for production;	(3) Drafting Discovery Answers/Responses	\$650.00 hr	0.80	0.80	\$520.00
05/18/2015	Lithium Ion Batteries	Batteries	Travel to and meet with client at Richmond regarding document collection and production;	(6) Discovery Meet & Confer	\$650.00 hr	2.50	2.50	\$1,625.00
05/18/2015	Lithium Ion Batteries	Batteries	Consider and agree to waiver for defense firm that represents in Richmond in other matters; confer re same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.60	0.60	\$390.00
05/20/2015	Lithium Ion Batteries	Batteries	Coordinate with In house counsel Felecia Gross re verification and progress in document collection;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.40	0.40	\$260.00
05/26/2015	Lithium Ion Batteries	Batteries	Review and analyze documents produced by Palo Alto; coordinate preparation for production; confer with co-counsel re same;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$650.00 hr	1.80	1.80	\$1,170.00
05/27/2015	Lithium Ion Batteries	Batteries	Prepare for and attend coordination call with co-lead counsel on discovery responses;	(6) Discovery Meet & Confer	\$650.00 hr	0.80	0.80	\$520.00
05/29/2015	Lithium Ion Batteries	Batteries	Review and revise Palo Alto responses in preparation for service; review document production re: same;	(7) Document Review	\$650.00 hr	1.10	1.10	\$715.00
06/08/2015	Lithium Ion Batteries	Batteries	Meet with and train new document reviewer; orient her on the case;	(7) Document Review	\$650.00 hr	0.80	0.80	\$520.00
06/09/2015	Lithium Ion Batteries	Batteries	Draft and revise letter to defendants re: search terms; send letter;	(7) Document Review	\$650.00 hr	0.80	0.80	\$520.00

06/09/2015	Lithium Ion Batteries	Batteries	Follow up with clients re search terms and custodians in preparation for meet and confer with defendants;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.80	0.80	\$520.00
06/11/2015	Lithium Ion Batteries	Batteries	Coordinate with Yunah Rha re document review; review and analyze hot documents to send to clients;	(7) Document Review	\$650.00 hr	1.20	1.20	\$780.00
06/11/2015	Lithium Ion Batteries	Batteries	Coordinate with clients re follow up document searches, custodians and search terms;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.30	0.30	\$195.00
06/19/2015	Lithium Ion Batteries	Batteries	Prepare for and discuss with S Cikes case status and document collection for both Palo Alto and Richmond; discuss document analysis; coordinate follow up with clients in various issues;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.40	1.40	\$910.00
06/20/2015	Lithium Ion Batteries	Batteries	Review and analyze draft summary of Richmond purchases;	(7) Document Review	\$650.00 hr	0.40	0.40	\$260.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze Toshiba motion for summary judgment;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$650.00 hr	0.70	0.70	\$455.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze document; confer with YR re same;	(7) Document Review	\$650.00 hr	0.10	0.10	\$65.00
07/07/2015	Lithium Ion Batteries	Batteries	Meet with YR and discuss document review progress and protocols; prepare for and attend weekly call re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.30	1.30	\$845.00
07/07/2015	Lithium Ion Batteries	Batteries	Review and analyze documents reviewed by Yr; discuss significance;	(7) Document Review	\$650.00 hr	0.10	0.10	\$65.00
07/10/2015	Lithium Ion Batteries	Batteries	Confer with YR re doc review status and weekly summaries;	(6) Discovery Meet & Confer	\$650.00 hr	0.30	0.30	\$195.00
07/15/2015	Lithium Ion Batteries	Batteries	Meet with YR and discuss status of document review; review and analyze sample documents; prepare for and attend portion of call with other reviewers;	(7) Document Review	\$650.00 hr	0.90	0.90	\$585.00
08/20/2015	Lithium Ion Batteries	Batteries	Review YR's document summaries; assess status of document review; coordinate upcoming review strategy;	(7) Document Review	\$650.00 hr	0.50	0.50	\$325.00
08/25/2015	Lithium Ion Batteries	Batteries	Confer with BG re document review and case management issues;	(6) Discovery Meet & Confer	\$650.00 hr	0.40	0.40	\$260.00
08/27/2015	Lithium Ion Batteries	Batteries	Confer with JB re: work assignments and case management;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.20	0.20	\$130.00
09/03/2015	Lithium Ion Batteries	Batteries	Review briefly packers materials to be analyzed by YR;	(7) Document Review	\$650.00 hr	0.40	0.40	\$260.00

09/08/2015	Lithium Ion Batteries	Batteries	Confer re new document review project for YR; brief analysis of packers documents;	(7) Document Review	\$650.00 hr	0.30	0.30	\$195.00
09/14/2015	Lithium Ion Batteries	Batteries	Follow up with co-counsel re: discovery questions for clients;	(6) Discovery Meet & Confer	\$650.00 hr	0.20	0.20	\$130.00
09/15/2015	Lithium Ion Batteries	Batteries	Follow up re time period of document searches performed by clients; confer with various co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.70	0.70	\$455.00
09/18/2015	Lithium Ion Batteries	Batteries	Confer with Y. Rha re: new document assignment and importance of capacity restriction docs;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.30	0.30	\$195.00
09/19/2015	Lithium Ion Batteries	Batteries	Follow up with JG re: potential nonprofit client, etc;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.30	0.30	\$195.00
09/25/2015	Lithium Ion Batteries	Batteries	Follow up re: client responses to discovery requests;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.20	0.20	\$130.00
10/05/2015	Lithium Ion Batteries	Batteries	Confer with S. Williams re: case status and cessation of document review; confer re: assignment of depositions;	(6) Discovery Meet & Confer	\$650.00 hr	0.70	0.70	\$455.00
10/12/2015	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re: call with S. Williams re: preparation of municipal entities for dep and strategy on class cert;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.10	0.10	\$65.00
10/13/2015	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re: preparing document production and responses to Toshiba's follow up requests;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.40	0.40	\$260.00
10/14/2015	Lithium Ion Batteries	Batteries	Review documents collected for production for responsiveness; review and correct issues with Bates stamping; prepare documents for production and coordinate with co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	1.70	1.70	\$1,105.00
10/14/2015	Lithium Ion Batteries	Batteries	Prepare and finalize documents for production; coordinate with clients and co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.90	0.90	\$585.00
11/05/2015	Lithium Ion Batteries	Batteries	Coordinate with various co-counsel regarding call to discuss discovery of public entities and strategy re: same;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.30	0.30	\$195.00
11/06/2015	Lithium Ion Batteries	Batteries	Confer with Y. Rha re: review of client documents and creating summary chart;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.30	0.30	\$195.00
11/06/2015	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with S. Williams and L. Renne re: preparation of municipal clients for deposition and assignment of depositions in the action;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.70	0.70	\$455.00
12/22/2015	Lithium Ion Batteries	Batteries	Review and analyze summary of client documents and identify [REDACTED]	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$650.00 hr	0.70	0.70	\$455.00



12/22/2015	Lithium Ion Batteries	Batteries	Follow up with co-lead counsel re: defendants' request to schedule depositions of public entities;	(11) Litigation Strategy, Analysis & Case Management	\$650.00 hr	0.40	0.40	\$260.00
<b>Total Labor For Lesley Weaver</b>						<b>55.70</b>	<b>55.70</b>	<b>\$ 36,205.00</b>

**Whitney Street**

03/05/2015	Lithium Ion Batteries	Batteries	Confer with J. Block regarding staffing.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.15	0.15	\$89.25
08/26/2015	Lithium Ion Batteries	Batteries	Discuss case with Y. Rha.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.25	0.25	\$148.75
08/27/2015	Lithium Ion Batteries	Batteries	Discuss case/staffing with L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.15	0.15	\$89.25
10/05/2015	Lithium Ion Batteries	Batteries	Confer with team re: status/strategy.	(11) Litigation Strategy, Analysis & Case Management	\$595.00 hr	0.20	0.20	\$119.00
<b>Total Labor For Whitney Street</b>						<b>0.75</b>	<b>0.75</b>	<b>\$446.25</b>

**Yunah Rah**

06/09/2015	Lithium Ion Batteries	Batteries	Review Complaint	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	0.50	0.50	\$197.50
06/09/2015	Lithium Ion Batteries	Batteries	Reviewed Complaint	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	1.00	1.00	\$395.00
06/10/2015	Lithium Ion Batteries	Batteries	Meeting with Kasey to review document review procedures	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	2.00	2.00	\$790.00
06/10/2015	Lithium Ion Batteries	Batteries	Reviewed Complaint	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	6.00	6.00	\$2,370.00
06/10/2015	Lithium Ion Batteries	Batteries	Reviewed Protective Order	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	0.50	0.50	\$197.50

06/11/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing LIB - Fraudulent Concealment Docs D/L Link	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
06/11/2015	Lithium Ion Batteries	Batteries	Review/analyze LIB - Fraudulent Concealment Docs D/L Link	(7) Document Review	\$395.00 hr	1.40	1.40	\$553.00
06/11/2015	Lithium Ion Batteries	Batteries	Reviewing Batteries Merits Review Manual	(7) Document Review	\$395.00 hr	1.10	1.10	\$434.50
06/11/2015	Lithium Ion Batteries	Batteries	Overview of Catalyst	(7) Document Review	\$395.00 hr	0.10	0.10	\$39.50
06/11/2015	Lithium Ion Batteries	Batteries	Reviewing coding/doc review procedures	(7) Document Review	\$395.00 hr	0.10	0.10	\$39.50
06/12/2015	Lithium Ion Batteries	Batteries	Review and analyze hot docs with Lesley Weaver	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
06/12/2015	Lithium Ion Batteries	Batteries	Review and analyze doc review call notes and updates to review manual & 20 best documents from Ari Lehman	(7) Document Review	\$395.00 hr	0.80	0.80	\$316.00
06/15/2015	Lithium Ion Batteries	Batteries	Register for catalyst webinar & print documents to review and prepare for webinar	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.40	0.40	\$158.00
06/15/2015	Lithium Ion Batteries	Batteries	Reviewing document review call & updates to document review manual	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.25	0.25	\$98.75
06/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Coding Manual; Cheat Sheet; LIB Batch Memo Template; Key Terms in prep for doc review webinar	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.70	1.70	\$671.50
06/16/2015	Lithium Ion Batteries	Batteries	Review and analyze hot docs to send to clients	(7) Document Review	\$395.00 hr	0.80	0.80	\$316.00
06/17/2015	Lithium Ion Batteries	Batteries	Review and analyze corrected/revised manual	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.70	0.70	\$276.50
06/17/2015	Lithium Ion Batteries	Batteries	Becoming familiar with doc review platform- Catalyst	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.40	0.40	\$158.00
06/17/2015	Lithium Ion Batteries	Batteries	Attending document review training webinar	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.50	1.50	\$592.50
06/18/2015	Lithium Ion Batteries	Batteries	Phone meeting with Lesley & Ronnie re: foreign language doc review translations/coding;	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00

06/18/2015	Lithium Ion Batteries	Batteries	Meeting with Kasey to go over Catalyst and hot docs	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.60	1.60	\$632.00
06/18/2015	Lithium Ion Batteries	Batteries	Review and analyze hot docs to send to clients	(7) Document Review	\$395.00 hr	0.50	0.50	\$197.50
06/18/2015	Lithium Ion Batteries	Batteries	Review and analyze documents- Public Folders/5-15-2015 Set Review/LGC/Chung, Young Wook/K_CustReview_0001 LGC-MDL0039561 & LGC-MDL0039564	(7) Document Review	\$395.00 hr	2.20	2.20	\$869.00
06/18/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing first batch of Korean document review items	(7) Document Review	\$395.00 hr	0.60	0.60	\$237.00
06/19/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing documents for discovery	(7) Document Review	\$395.00 hr	1.80	1.80	\$711.00
06/22/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing documents for discovery	(7) Document Review	\$395.00 hr	4.10	4.10	\$1,619.50
06/23/2015	Lithium Ion Batteries	Batteries	Weekly document review conference call	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.70	0.70	\$276.50
06/23/2015	Lithium Ion Batteries	Batteries	Review and analyze documents for discovery	(7) Document Review	\$395.00 hr	3.60	3.60	\$1,422.00
06/24/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	2.20	2.20	\$869.00
06/24/2015	Lithium Ion Batteries	Batteries	Reviewing complaint, doc review manual, and key players	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
06/25/2015	Lithium Ion Batteries	Batteries	Phone conference with Korean Doc Review Coordinator- Shinae Kim-Helms reviewing past doc review work	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.60	0.60	\$237.00
06/25/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	3.40	3.40	\$1,343.00
06/26/2015	Lithium Ion Batteries	Batteries	Review and analyze list of characters and doc review manual	(7) Document Review	\$395.00 hr	0.30	0.30	\$118.50
06/26/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	3.50	3.50	\$1,382.50
06/29/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	5.60	5.60	\$2,212.00

06/30/2015	Lithium Ion Batteries	Batteries	Weekly doc review conference call	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
06/30/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	5.40	5.40	\$2,133.00
07/01/2015	Lithium Ion Batteries	Batteries	Email from Ronnie regarding updated coding requirements	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
07/01/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	2.30	2.30	\$908.50
07/01/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	2.70	2.70	\$1,066.50
07/02/2015	Lithium Ion Batteries	Batteries	Conferring within firm regarding coding discovery document	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
07/02/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	1.50	1.50	\$592.50
07/02/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	3.20	3.20	\$1,264.00
07/03/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	0.60	0.60	\$237.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	\$395.00 hr	6.20	6.20	\$2,449.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze hot doc examples by issue (sent from Ronnie Spiegel).	(7) Document Review	\$395.00 hr	0.40	0.40	\$158.00
07/07/2015	Lithium Ion Batteries	Batteries	Corresponding within firm regarding discovery documents and "CA contacts" coding	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
07/07/2015	Lithium Ion Batteries	Batteries	Meeting with Lesley regarding documents reviewed and coded such as whether a certain document is considered a "CA Contact"; updates on progress and the type of documents reviewed	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.70	0.70	\$276.50
07/07/2015	Lithium Ion Batteries	Batteries	Catalyst weekly conference call- updates on coding; Toshiba's SMJ; Defs' meetings (conspiracy v. opportunity contact); duplicate documents	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.60	0.60	\$237.00
07/07/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery - LGC's email correspondence; Business meeting minutes; sales & production reports	(7) Document Review	\$395.00 hr	7.40	7.40	\$2,923.00

07/07/2015	Lithium Ion Batteries	Batteries	Review and analyze Toshiba MSJ- declarations; Master Cast of Characters	(7) Document Review	\$395.00 hr	0.10	0.10	\$39.50
07/08/2015	Lithium Ion Batteries	Batteries	Reviewing email from Shinae Kim and Ronnie Spiegel re "CA contacts" and legitimate supplier/customer documents	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
07/08/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents: meeting minutes; LGC Business performance reports and performance goals/reviews	(7) Document Review	\$395.00 hr	6.50	6.50	\$2,567.50
07/09/2015	Lithium Ion Batteries	Batteries	Email with Ronnie Spiegel and Shinae Kim re duplicate documents in catalyst and how to code	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
07/09/2015	Lithium Ion Batteries	Batteries	Communicate with Jessica Moy re general LIB overview (case strategy, timeline of case, upcoming depositions)	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.10	1.10	\$434.50
07/09/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC 2004 performance analysis	(7) Document Review	\$395.00 hr	3.60	3.60	\$1,422.00
07/09/2015	Lithium Ion Batteries	Batteries	Review and analyze sample hot documents and Toshiba MSJ	(7) Document Review	\$395.00 hr	1.60	1.60	\$632.00
07/09/2015	Lithium Ion Batteries	Batteries	Review and analyze declaration of Fujimoto, Eguchi, and Kubo (Toshiba MSJ)	(7) Document Review	\$395.00 hr	0.60	0.60	\$237.00
07/10/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean documents: SEMC meeting minutes; LG US Data Book Volume 5; sorting out duplicate documents	(7) Document Review	\$395.00 hr	5.30	5.30	\$2,093.50
07/10/2015	Lithium Ion Batteries	Batteries	Email from Ronnie Spiegel re filling in correct "Dates" for coding in doc review project and making appropriate revisions on past doc review projects	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	0.30	0.30	\$118.50
07/12/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean documents: company changes to production and plans	(7) Document Review	\$395.00 hr	2.10	2.10	\$829.50
07/13/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC's reports and Nintendo meeting minutes	(7) Document Review	\$395.00 hr	7.60	7.60	\$3,002.00
07/14/2015	Lithium Ion Batteries	Batteries	Weekly Catalyst conference call- updates on Toshiba SMJ, Toshiba depositions, meeting between defendants, co-conspirators, fraudulent concealment, English documents for FL reviewers	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.70	0.70	\$276.50
07/14/2015	Lithium Ion Batteries	Batteries	Communication with Shinae Kim re: possible not document- mention of Matsushima (Nokia) and price/costs; whether this is "meeting between defendants"; clarification on Matsushima (Nokia) and Matsushita (Panasonic)- setting up bi-weekly Korean	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
07/14/2015	Lithium Ion Batteries	Batteries	Email from Hisun re: sample phrases for "fraudulent concealment"	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50

07/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Nokia documents and Motorola meeting minutes; Nokia workshop meetings	(7) Document Review	\$395.00 hr	7.10	7.10	\$2,804.50
07/15/2015	Lithium Ion Batteries	Batteries	Email correspondence & phone conference with Korean doc review coordinator, Shinae Kim, re irrelevant docs, "tabby connector," Chinese characters, and possible hot doc (LGC-MDL0041892)	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
07/15/2015	Lithium Ion Batteries	Batteries	Review and analyze March 2010 meeting minutes and cylindrical Performance Analysis Summary; LGC's polymer proposal value	(7) Document Review	\$395.00 hr	7.20	7.20	\$2,844.00
7/16/2015	Lithium Ion Batteries	Batteries	Review and analyze reports/emails on swelling/failed batteries and May 2011 SEMC Forecast Newsletter	(7) Document Review	\$395.00 hr	2.70	2.70	\$1,066.50
07/16/2015	Lithium Ion Batteries	Batteries	Review and analyze 2008 International Business Strategy reports and data by country; June 2004 Battery factory KPI performance	(7) Document Review	\$395.00 hr	5.00	5.00	\$1,975.00
07/17/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: RIM shipment status; quarterly sales percentages	(7) Document Review	\$395.00 hr	3.50	3.50	\$1,382.50
07/17/2015	Lithium Ion Batteries	Batteries	Review and analyze Battery Market Report - '10 review and '11 forecast: LIB Market demands, NBPC Market size, Smartphone OS Comparison Chart	(7) Document Review	\$395.00 hr	3.60	3.60	\$1,422.00
07/19/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents from Apple, i.e. meeting agendas	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
07/20/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: production and inventory status/action plans; 2009 Business plan reviews	(7) Document Review	\$395.00 hr	7.90	7.90	\$3,120.50
07/21/2015	Lithium Ion Batteries	Batteries	Review email from Shinae re past docs coded- coding English documents; cobalt price coding; updates on "fraudulent concealment" & making appropriate updates	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
07/21/2015	Lithium Ion Batteries	Batteries	weekly lithium battery doc review call- new 1000 or documents coming in from Defendants; moving through document review quicker; English documents in batch; dating the documents; Toshiba documents between 2003-2004; trade association coding	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.50	0.50	\$197.50
07/21/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: Apple QBR reports and Hot doc- 2010 CM Business plan meeting minutes (adjusting sales prices according to lower cobalt prices and competing trends)	(7) Document Review	\$395.00 hr	7.60	7.60	\$3,002.00
07/22/2015	Lithium Ion Batteries	Batteries	Meeting with LW to discuss hot documents (cobalt prices) and memo assignment for timeline/overview of LGC's involvement with price fixing; updates on doc review team status and progress	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.00	1.00	\$395.00
07/22/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: Nokia meeting reports/minutes; company scorecards for LGC	(7) Document Review	\$395.00 hr	7.80	7.80	\$3,081.00
07/23/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: company battery production capacities and reports	(7) Document Review	\$395.00 hr	2.50	2.50	\$987.50

07/27/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: investment strategies and inventory comparisons; Apple LIB shipment data for Japanese suppliers	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
07/27/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: meeting minutes and weekly reports from Apple, Nokia, LGC, Microsoft	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
07/28/2015	Lithium Ion Batteries	Batteries	Weekly LIB conference call with Ronnie & Doc Review Team: irrelevant v. hot documents, summarizing hot documents for depositions, fraudulent concealment	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
07/28/2015	Lithium Ion Batteries	Batteries	Review and analyze N90 inventory request; FAR of N90 RMA issue (for Apple)	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
07/28/2015	Lithium Ion Batteries	Batteries	Batch memo for LGC Chung, Young Wook: K CustReview 0002	(7) Document Review	\$395.00 hr	0.60	0.60	\$237.00
07/28/2015	Lithium Ion Batteries	Batteries	Review and analyze business weekly report of overseas subsidiaries; Polymer Battery- Market Status and Basic Operations & Plant and inventory management tracking and planning	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
07/29/2015	Lithium Ion Batteries	Batteries	Email to Shinae & Ronnie regarding Coding Field Instructions for "Contracts"	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
07/29/2015	Lithium Ion Batteries	Batteries	Review and analyze supply, shipment, and performance plans; K93 WIP report-LGC Preliminary Plan	(7) Document Review	\$395.00 hr	4.30	4.30	\$1,698.50
07/29/2015	Lithium Ion Batteries	Batteries	Review and analyze discussion of prices/costs for Apple K20; Apple N88 GG DVT AUDIT Corrective Action Report and PCM function test parameter	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
07/30/2015	Lithium Ion Batteries	Batteries	Draft internal memo re LGC's involvement with LIB case as defendants and overview of case in preparation for depositions	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	3.40	3.40	\$1,343.00
07/30/2015	Lithium Ion Batteries	Batteries	email to Ronnie & Shinae to update LGC factory location (Ochang, Korea)	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
07/30/2015	Lithium Ion Batteries	Batteries	Review and analyze K20 new program (Capacity simulation, design review, sample lead time)	(7) Document Review	\$395.00 hr	3.50	3.50	\$1,382.50
07/30/2015	Lithium Ion Batteries	Batteries	Review and analyze internal shipment plans and inventories	(7) Document Review	\$395.00 hr	2.20	2.20	\$869.00
07/31/2015	Lithium Ion Batteries	Batteries	Review and analyze 2009 NBPC line-up; December polymer shipment plan	(7) Document Review	\$395.00 hr	4.40	4.40	\$1,738.00
07/31/2015	Lithium Ion Batteries	Batteries	Review and analyze sales and production results; battery testing reports	(7) Document Review	\$395.00 hr	5.00	5.00	\$1,975.00

08/03/2015	Lithium Ion Batteries	Batteries	Review and analyze Industrial design & industrial design review (by Gossamer from Apple) & Pegatron LEON 1S1P 1530mAh Battery Pack Design Review and Test Plan	(7) Document Review	\$395.00 hr	5.00	5.00	\$1,975.00
08/03/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple shipping schedules/models and daily production reports	(7) Document Review	\$395.00 hr	2.10	2.10	\$829.50
08/03/2015	Lithium Ion Batteries	Batteries	Review and analyze battery specs reports, tests, and audits; demand forecast	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
08/04/2015	Lithium Ion Batteries	Batteries	LIB Weekly Conference Call: clarification for "contracts" coding; skipping coded documents	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
08/04/2015	Lithium Ion Batteries	Batteries	Review and analyze battery line audits, battery certifications, and N58/N72 cell daily report & defect data	(7) Document Review	\$395.00 hr	4.80	4.80	\$1,896.00
08/04/2015	Lithium Ion Batteries	Batteries	Review and analyze CNY Shut-down Plan- LGC; Apple N82 York C-tech visit schedule on 7/17; Apple FCT update (N58/72/82/88) from LGC reply	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/05/2015	Lithium Ion Batteries	Batteries	Review and analyze monthly forecasts and shipping requests (Palladium)	(7) Document Review	\$395.00 hr	5.20	5.20	\$2,054.00
08/05/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple Weekly Meeting reports; various company meeting minutes	(7) Document Review	\$395.00 hr	5.00	5.00	\$1,975.00
08/06/2015	Lithium Ion Batteries	Batteries	Review and analyze LG N58, N72, N82 & Post Ramp Qual Batteries Conference Call- production and delivery plan	(7) Document Review	\$395.00 hr	4.70	4.70	\$1,856.50
08/07/2015	Lithium Ion Batteries	Batteries	Communicate with Lesley Weaver re documents reviewed this past week: LGC setting prices for cells, Apple's request for increase in production, technical documents	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
08/07/2015	Lithium Ion Batteries	Batteries	Email from Shinae Kim re past doc review batch memo and feedback	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
08/07/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC C-tech labor issue; N58 battery-LGC pack audit MIL and CAR; FAR for Apple N58 DVTa IQC fail	(7) Document Review	\$395.00 hr	7.40	7.40	\$2,923.00
08/10/2015	Lithium Ion Batteries	Batteries	Review and analyze email correspondence updates on daily production reports, inventory status requests, issues with cells/batteries and shipment plans for batteries/cells	(7) Document Review	\$395.00 hr	8.10	8.10	\$3,199.50
08/11/2015	Lithium Ion Batteries	Batteries	Email to Ronnie Spiegel & Shinae Kim with DW Lee 2 Batch Memo attachment.	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
08/11/2015	Lithium Ion Batteries	Batteries	weekly LIB conference call: defendant communications and whether it is legitimate; Toshiba's communications with other defendants during 2003-2004 (sale of its equipment); indicating the source of the information; Bonnie to leave LIB project and new director to come on	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.40	0.40	\$158.00



08/11/2015	Lithium Ion Batteries	Batteries	Review and note Chinese character documents for batch memo	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
08/11/2015	Lithium Ion Batteries	Batteries	Review and analyze Palladium cell damage- CAR for N18 bottom leakage issues in CSMC; company meeting minutes and pricing memos	(7) Document Review	\$395.00 hr	7.30	7.30	\$2,883.50
08/12/2015	Lithium Ion Batteries	Batteries	Review and analyze sales Plans and Review of Past Sales Results	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/12/2015	Lithium Ion Batteries	Batteries	Email from Ronnie regarding naming LIB batch memos	(7) Document Review	\$395.00 hr	0.10	0.10	\$39.50
08/12/2015	Lithium Ion Batteries	Batteries	Review and analyze safety procedures: grading methods, solution reviews, corrective actions and improvements.	(7) Document Review	\$395.00 hr	4.30	4.30	\$1,698.50
08/13/2015	Lithium Ion Batteries	Batteries	Review and analyze Nexcon PCM Issue Plan Meeting Minutes; SEMC 2009 Business Plan and 2010-2012 Progress Plan Progress/Forecast	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
08/13/2015	Lithium Ion Batteries	Batteries	Review and analyze inventory requests for various companies, and Shenzhen Office Pack analysis of key equipment investment cost and adjustments	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/13/2015	Lithium Ion Batteries	Batteries	Review and analyze Brazil specifications for cell phone batteries.	(7) Document Review	\$395.00 hr	1.90	1.90	\$750.50
08/14/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC N94 Cell Engineering; N94 Battery LGC Proto 3 Final CL Reports; N18 Battery Spec	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
08/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Data for 2008-2011 Apple Long-Term Plans: Standards for Objective Setting #3, Competitive Structure, Price Level; end of November K6 event	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
08/14/2015	Lithium Ion Batteries	Batteries	Review and analyze battery sales plan updates, budgets for swelling issues, and production schedules with shipment requests by multiple companies	(7) Document Review	\$395.00 hr	4.60	4.60	\$1,817.00
08/17/2015	Lithium Ion Batteries	Batteries	Review and analyze daily reports, production and organization schedules, and chip allocations	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/17/2015	Lithium Ion Batteries	Batteries	Review and analyze reported batteries issues (adhesive tap turnup issue, sorting result defects)	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/18/2015	Lithium Ion Batteries	Batteries	Review and analyze customers' shipment requests and inventory reports	(7) Document Review	\$395.00 hr	8.20	8.20	\$3,239.00
08/19/2015	Lithium Ion Batteries	Batteries	review and analyze updated shipment requests from Apple Forecast, and email between DW Lee, Apple and Toshiba that shows Opportunity Contact & Toshiba Withdrawal because communication with Toshiba (Toshiba's CMI that they exited LIB market in 2004)	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00

08/19/2015	Lithium Ion Batteries	Batteries	Review and analyze N18 LGC Battery Preliminary Specification- Proto 2 Deliverables; LG Suzhou RoHS Meeting minutes and forecast	(7) Document Review	\$395.00 hr	4.50	4.50	\$1,777.50
08/20/2015	Lithium Ion Batteries	Batteries	Email communications with Korean doc review team (Shinae Kim, Jessica Jeong, Jongguk Choi, Jessica Jeong) re key packers and involvement with conspiracy & key documents with antitrust concerns involving competitors' prices	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
08/20/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple Vendor Information- iPhone iPod ISS check in October & Sales quantity; Apple Pack N72 Purchase Materials & Shipping History; Apple N88 Battery: TI BQ GG IC Risk PO Release to PVT/Ramp	(7) Document Review	\$395.00 hr	4.40	4.40	\$1,738.00
08/20/2015	Lithium Ion Batteries	Batteries	Review and analyze TEBS May 2009 Monthly Closing Report; TEBS N58, N72, May Apple Pack Shipping Report, Additional Fee, Swap and Replacement List, Sample Delivery List	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
08/21/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC documents (JWW Lee); re-reviewing coded documents to find mention of packers Celxpert Energy Corporation, Dynapack International Technology Corporation, and Simplo Technology, Inc. to verify any conspiratorial communications	(7) Document Review	\$395.00 hr	4.10	4.10	\$1,619.50
08/21/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC-Dynapack Meeting Minutes re grading project and printing barcodes; Palladium Electronics Production Plan	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/24/2015	Lithium Ion Batteries	Batteries	Review and analyze N88 LGC EVT2 Feedback, Data Review and Production Cycle Time Analysis, N88 Battery Pack Manufacturing Process, DVT+; N72 Dimension Inspection Report, and shipment plans/updates	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/24/2015	Lithium Ion Batteries	Batteries	Email correspondence with Korean doc review team & phone call with Shinae re packers and new focus on Celxpert, Dynapack and Simplo's communication and possible collusion	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
08/24/2015	Lithium Ion Batteries	Batteries	Review and analyze Internal LGC email re report and comment on meeting with Taiwanese packers (HP Pre-Meeting), price increase reports and Implementation Measures	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/25/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC Pack Manager's Schedule/Agenda to visit Packers domestically (Korea) and in China; Packer's budget proposal	(7) Document Review	\$395.00 hr	4.10	4.10	\$1,619.50
08/25/2015	Lithium Ion Batteries	Batteries	Review and analyze HP Talking Points, itinerary, and meeting minutes	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
08/26/2015	Lithium Ion Batteries	Batteries	Review and analyze Cobalt Market Outlook Report for 2007, market average/monthly forecast reports, and price matrices	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
08/26/2015	Lithium Ion Batteries	Batteries	Meeting with Whitney document review findings	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
08/26/2015	Lithium Ion Batteries	Batteries	Review and analyze internal LGC communications discussing changes to expected sales earnings for February (Nokia, LE, SEMC, HP) and for different types of batteries; Customer-specific issues (HP, Dell, Packers) for March 2011 such as shipment status, effort of Panasonic	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
08/26/2015	Lithium Ion Batteries	Batteries	Email thread with Korean Doc Review team of hot documents related to packers' involvement with collusion and clarification on legitimate meetings with packers	(7) Document Review	\$395.00 hr	4.70	4.70	\$1,856.50

08/27/2015	Lithium Ion Batteries	Batteries	Review and analyze sales plans, activity reviews, and shipment/allocation updates for several companies	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
08/27/2015	Lithium Ion Batteries	Batteries	Review and analyze other coded documents by Korean team considered "hot" such as packers deciding pricing on cells, LGC's price increase on HP, code words for SDI (Cheonam Company) and HD (Houston Company)	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
08/27/2015	Lithium Ion Batteries	Batteries	Review and analyze coded documents from Chinese group re communications between Panasonic and SMP about competitor's prices	(7) Document Review	\$395.00 hr	2.90	2.90	\$1,145.50
08/28/2015	Lithium Ion Batteries	Batteries	Email communication with Korean Packer Doc Review Team (JG Choi, SN Kim, S Scarlett, J Jeong, H Hsu) re Packer Assignment Updates	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
08/28/2015	Lithium Ion Batteries	Batteries	Review and analyze issue updates (management and product) and business plans for upcoming quarters.	(7) Document Review	\$395.00 hr	4.30	4.30	\$1,698.50
08/31/2015	Lithium Ion Batteries	Batteries	Review and analyze 2011 Taiwan Corporate Business Report (cell) describing Taiwan Corporate team organization and packer updates; HP shipment report	(7) Document Review	\$395.00 hr	3.40	3.40	\$1,343.00
08/31/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC Meeting Reports re: pack price, e-bidding pushback, and meeting minutes (ITT and Panasonic meetings)	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
09/01/2015	Lithium Ion Batteries	Batteries	Review and analyze Customer-Specific Personnel (for HP, Dell, Asus, Acer, Lenovo, Toshiba); HP Business Discussion (key drivers, execution of LTA, HP's involvement over packers)	(7) Document Review	\$395.00 hr	4.30	4.30	\$1,698.50
09/01/2015	Lithium Ion Batteries	Batteries	Review and analyze HP-LGC Meeting in Korea Meeting Materials: "Confidential" Handwritten notes for Analysis on cell Shares in Packers (% from Jan-May for Sony, Sanyo, SDI, MBI, LGC), Pack Share Trend & Implications	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
09/02/2015	Lithium Ion Batteries	Batteries	Review and analyze HP and Dell organizational charts of working groups, key people, and development teams	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
09/02/2015	Lithium Ion Batteries	Batteries	Review and analyze HP-LGC Business Discussion at the LGC Office in Taipei- expected shipment, e-bidding rule, cell allocation meeting, OOC	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
09/02/2015	Lithium Ion Batteries	Batteries	Review and analyze Overseas branch business meeting report- LGC TW- Week of 10/27/2008-10/31 Progress & Week of 11/3-11/7 Action Plans for each Customer	(7) Document Review	\$395.00 hr	2.40	2.40	\$948.00
09/03/2015	Lithium Ion Batteries	Batteries	Review and analyze business status and meeting minutes Apple and HP) and quarterly analysis/improvement points.	(7) Document Review	\$395.00 hr	8.20	8.20	\$3,239.00
09/03/2015	Lithium Ion Batteries	Batteries	Draft and review batch memo for Packers 1	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
09/04/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple- Motorola CRM Weekly Meeting; Market data for total overseas market, HP, Dell, and Acer market & annual business travel info	(7) Document Review	\$395.00 hr	7.80	7.80	\$3,081.00

09/05/2015	Lithium Ion Batteries	Batteries	Review and analyze HP-LGC Talking Point- MU E-Bidding Price, Share Simulation, Operating Profit Comparison (\$17 best, \$18 worst price bids)	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
09/08/2015	Lithium Ion Batteries	Batteries	Email from Marc Pilotic (Lieff Cabraser) re new doc review assignment/project; review excel spreadsheet to be filled for new project	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.25	0.25	\$98.75
09/08/2015	Lithium Ion Batteries	Batteries	Email to Shana Scarlett and Shinae Kim-Helms re batch memo for Packers 2 folder doc review	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
09/08/2015	Lithium Ion Batteries	Batteries	Phonecall with Marc Pilotin re new doc review project for cell capacity/specifications	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.30	0.30	\$118.50
09/09/2015	Lithium Ion Batteries	Batteries	Call with M. Pilotin re coding documents for new capacity and spec project	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
09/09/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean docs related to cell capacity and specifications for Expert report	(7) Document Review	\$395.00 hr	3.70	3.70	\$1,461.50
09/10/2015	Lithium Ion Batteries	Batteries	Discuss new project (capacity) with LW	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
09/10/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	\$395.00 hr	4.10	4.10	\$1,619.50
09/11/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	\$395.00 hr	4.10	4.10	\$1,619.50
09/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	\$395.00 hr	2.30	2.30	\$908.50
09/15/2015	Lithium Ion Batteries	Batteries	Email exchange with M. Pilotin re case progress	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
09/15/2015	Lithium Ion Batteries	Batteries	Review and analyze documents re cylindrical cell capacity issues for expert report	(7) Document Review	\$395.00 hr	4.70	4.70	\$1,856.50
09/15/2015	Lithium Ion Batteries	Batteries	Review ORDER RE PLAINTIFFS' MOTION TO COMPEL DEPOSITION OF SEOK HWAN KWAK	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	0.40	0.40	\$158.00
09/16/2015	Lithium Ion Batteries	Batteries	LIB Conference Call re doc review assignments and updates for expert reports	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
09/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LG documents re capacity issues for expert report	(7) Document Review	\$395.00 hr	8.90	8.90	\$3,515.50

09/17/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LG documents for expert report re cell capacity	(7) Document Review	\$395.00 hr	2.40	2.40	\$948.00
09/18/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	\$395.00 hr	7.20	7.20	\$2,844.00
09/21/2015	Lithium Ion Batteries	Batteries	Call with M. Pilotin & J. Jeong to review new doc review assignment re LGC product roadmaps	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.40	0.40	\$158.00
09/21/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LG docs re "product roadmaps"	(7) Document Review	\$395.00 hr	6.90	6.90	\$2,725.50
09/22/2015	Lithium Ion Batteries	Batteries	Review, analyze and code Korean LGC documents under search term "product roadmap" for experts	(7) Document Review	\$395.00 hr	6.00	6.00	\$2,370.00
09/23/2015	Lithium Ion Batteries	Batteries	Conference call with M. Pilotin re progress of roadmap doc review for experts	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.10	0.10	\$39.50
09/23/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents re product roadmaps for expert	(7) Document Review	\$395.00 hr	4.20	4.20	\$1,659.00
09/24/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for experts re product roadmaps and cell capacity/specifications	(7) Document Review	\$395.00 hr	7.20	7.20	\$2,844.00
09/25/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for expert deposition re product roadmaps and cell specifications	(7) Document Review	\$395.00 hr	5.50	5.50	\$2,172.50
09/26/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for expert deposition re product roadmaps and cell specs	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
09/28/2015	Lithium Ion Batteries	Batteries	Review, analyze and code documents for experts re product roadmaps and specifications	(7) Document Review	\$395.00 hr	8.10	8.10	\$3,199.50
09/29/2015	Lithium Ion Batteries	Batteries	Review and analyze "product roadmap" docs within LGC batch for expert	(7) Document Review	\$395.00 hr	8.70	8.70	\$3,436.50
09/30/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for product roadmaps and spec for expert prep	(7) Document Review	\$395.00 hr	4.00	4.00	\$1,580.00
10/05/2015	Lithium Ion Batteries	Batteries	Phone conference with M. Pilotin re the week's doc review project re LGC roadmaps for experts	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.20	0.20	\$79.00
10/05/2015	Lithium Ion Batteries	Batteries	Review, analyze and code LGC documents under search term "roadmap" for expert review	(7) Document Review	\$395.00 hr	6.50	6.50	\$2,567.50

10/06/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC product codes for experts	(7) Document Review	\$395.00 hr	3.50	3.50	\$1,382.50
10/07/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC product code docs for experts	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
10/08/2015	Lithium Ion Batteries	Batteries	Review and analyze product code documents for experts	(7) Document Review	\$395.00 hr	3.70	3.70	\$1,461.50
10/09/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC documents by product code names for experts	(7) Document Review	\$395.00 hr	2.50	2.50	\$987.50
10/12/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC product code docs for experts	(7) Document Review	\$395.00 hr	5.70	5.70	\$2,251.50
10/13/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC docs with product code name search terms for expert review	(7) Document Review	\$395.00 hr	6.20	6.20	\$2,449.00
10/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean docs of specific LIB Product Codes for expert	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
10/15/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC documents with specific LIB product code name search terms for experts	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
10/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LIB product code docs for expert	(7) Document Review	\$395.00 hr	4.50	4.50	\$1,777.50
10/19/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean docs by product code names for experts	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
10/20/2015	Lithium Ion Batteries	Batteries	Email correspondence with HS Kim, SH Kim, and M Pilotin re LIB doc translations for depo prep and other doc review assignments	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	0.40	0.40	\$158.00
10/20/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean documents for hot docs re fraudulent concealment	(7) Document Review	\$395.00 hr	6.50	6.50	\$2,567.50
10/21/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean translations of DW Lee docs in prep for DW Lee depo	(7) Document Review	\$395.00 hr	1.70	1.70	\$671.50
10/21/2015	Lithium Ion Batteries	Batteries	Analyze and confirm hot documents from HS Rim	(7) Document Review	\$395.00 hr	1.50	1.50	\$592.50
10/21/2015	Lithium Ion Batteries	Batteries	Review LGC Korean docs by product specifications for experts	(7) Document Review	\$395.00 hr	4.50	4.50	\$1,777.50

10/22/2015	Lithium Ion Batteries	Batteries	Review and analyze English translations of Korean hot docs for DW Lee depo; Correspond with LIB Korean team re same	(7) Document Review	\$395.00 hr	1.00	1.00	\$395.00
10/22/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC docs by product code names	(7) Document Review	\$395.00 hr	6.00	6.00	\$2,370.00
10/26/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC/SDI docs for fraudulent concealment & correspondence with LIB team re same	(7) Document Review	\$395.00 hr	6.00	6.00	\$2,370.00
10/27/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC/SDI docs for fraudulent concealment	(7) Document Review	\$395.00 hr	8.20	8.20	\$3,239.00
10/28/2015	Lithium Ion Batteries	Batteries	Review translations of hot documents in preparation for deposition	(7) Document Review	\$395.00 hr	0.80	0.80	\$316.00
10/28/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC/SDI docs for fraudulent concealment	(7) Document Review	\$395.00 hr	4.70	4.70	\$1,856.50
11/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Def RFP & PI Richmond & PA responses; draft chart for documents produced by PI & possible objections or issues	(7) Document Review	\$395.00 hr	3.70	3.70	\$1,461.50
11/19/2015	Lithium Ion Batteries	Batteries	Review documents produced by clients and draft chart with responsive/unresponsive productions	(7) Document Review	\$395.00 hr	5.50	5.50	\$2,172.50
11/24/2015	Lithium Ion Batteries	Batteries	Review and analyze doc production by Pls; draft chart of findings to verify responsiveness to Def's ROGs & RFP	(7) Document Review	\$395.00 hr	9.00	9.00	\$3,555.00
11/25/2015	Lithium Ion Batteries	Batteries	Analyze Pl's doc production; draft chart verifying responsiveness	(7) Document Review	\$395.00 hr	5.50	5.50	\$2,172.50
12/02/2015	Lithium Ion Batteries	Batteries	Review and analyze PI Richmond's doc production	(7) Document Review	\$395.00 hr	3.00	3.00	\$1,185.00
12/03/2015	Lithium Ion Batteries	Batteries	Review and analyze Def's ROG & RFP to PI Richmond & Palo Alto; Richmond productions; draft chart of documents produced	(7) Document Review	\$395.00 hr	8.50	8.50	\$3,357.50
12/04/2015	Lithium Ion Batteries	Batteries	Review and analyze Richmond document production	(7) Document Review	\$395.00 hr	2.00	2.00	\$790.00
12/07/2015	Lithium Ion Batteries	Batteries	Review Richmond productions and classify each item as responsive/non-responsive	(7) Document Review	\$395.00 hr	6.00	6.00	\$2,370.00
12/08/2015	Lithium Ion Batteries	Batteries	Analyze Richmond productions; Review Palo Alto productions	(7) Document Review	\$395.00 hr	7.10	7.10	\$2,804.50

12/09/2015	Lithium Ion Batteries	Batteries	Analyze Palo Alto productions and draft memo for Def's RFP	(7) Document Review	\$395.00 hr	5.00	5.00	\$1,975.00
12/10/2015	Lithium Ion Batteries	Batteries	Analyze Richmond & PA productions; continue drafting memo	(7) Document Review	\$395.00 hr	7.20	7.20	\$2,844.00
12/11/2015	Lithium Ion Batteries	Batteries	Analyze responsiveness of PI's productions and draft/revise memo	(7) Document Review	\$395.00 hr	5.00	5.00	\$1,975.00
12/12/2015	Lithium Ion Batteries	Batteries	Revise memo for PI productions	(3) Drafting Discovery Answers/Responses	\$395.00 hr	2.50	2.50	\$987.50
12/14/2015	Lithium Ion Batteries	Batteries	Draft memo for Def's RFP	(2) Drafting Discovery Requests	\$395.00 hr	5.50	5.50	\$2,172.50
12/15/2015	Lithium Ion Batteries	Batteries	Review Complaint, Def ROGs, draft index chart & memo of IPP Productions	(3) Drafting Discovery Answers/Responses	\$395.00 hr	7.00	7.00	\$2,765.00
12/16/2015	Lithium Ion Batteries	Batteries	Review Def ROGs & revise index chart & memo of IPP Productions	(7) Document Review	\$395.00 hr	5.50	5.50	\$2,172.50
12/18/2015	Lithium Ion Batteries	Batteries	Revise IPP Production memo	(2) Drafting Discovery Requests	\$395.00 hr	6.50	6.50	\$2,567.50
12/21/2015	Lithium Ion Batteries	Batteries	Final revisions to IPP Production Index & Memo; save to file; communicate with LW re same	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	6.00	6.00	\$2,370.00
<b>Total Labor For Yunah Rha</b>						<b>697.70</b>	<b>697.70</b>	<b>275591.50</b>
<b>Grand Total</b>						<b>856.35</b>	<b>856.35</b>	<b>\$ 345,384.75</b>



**Block & Leviton LLP - User Time and Lodestar Summary**

Date Start: 1/1/2016 | Date End: 12/31/2016 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
<b>Britt Cibulka</b>								
03/15/2016	Lithium Ion Batteries	Batteries	Review discovery requests and engage in setting up document review platform.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$350.00 hr	2.50	2.50	\$875.00
03/16/2016	Lithium Ion Batteries	Batteries	Review discovery requests, assist in client production and upload of documents to review platform.	(7) Document Review	\$350.00 hr	5.40	5.40	\$1,890.00
03/18/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	\$350.00 hr	1.50	1.50	\$525.00
03/21/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	\$350.00 hr	3.20	3.20	\$1,120.00
03/22/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	\$350.00 hr	3.90	3.90	\$1,365.00
03/22/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and confer with L. Weaver regarding review protocol and production issues.	(7) Document Review	\$350.00 hr	1.50	1.50	\$525.00
03/23/2016	Lithium Ion Batteries	Batteries	Prepare production set for documents produced by the City of Palo Alto.	(7) Document Review	\$350.00 hr	1.40	1.40	\$490.00
03/24/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	\$350.00 hr	1.70	1.70	\$595.00
03/25/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	\$350.00 hr	1.00	1.00	\$350.00
03/29/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for production.	(7) Document Review	\$350.00 hr	2.20	2.20	\$770.00
03/29/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and confer with L. Weaver regarding review protocol and production issues.	(7) Document Review	\$350.00 hr	0.50	0.50	\$175.00
03/30/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	2.50	2.50	\$875.00
03/30/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	0.90	0.90	\$315.00
03/31/2016	Lithium Ion Batteries	Batteries	Review documents from the City of Palo Alto for production.	(7) Document Review	\$350.00 hr	2.20	2.20	\$770.00
04/01/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	2.00	2.00	\$700.00
04/01/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	1.50	1.50	\$525.00
04/01/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	1.40	1.40	\$490.00
04/04/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	1.50	1.50	\$525.00
04/04/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	\$350.00 hr	0.70	0.70	\$245.00
04/06/2016	Lithium Ion Batteries	Batteries	Prepare supplemental production for the City of Palo Alto.	(7) Document Review	\$350.00 hr	0.80	0.80	\$280.00
04/08/2016	Lithium Ion Batteries	Batteries	Prepare supplemental production for the City of Palo Alto.	(7) Document Review	\$350.00 hr	0.20	0.20	\$70.00
					<b>Total Labor For Britt Cibulka</b>	<b>38.50</b>	<b>38.50</b>	<b>\$ 13,475.00</b>
<b>Julie Ledwig</b>								
01/29/2016	Lithium Ion Batteries	Batteries	Update pleadings index.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
03/02/2016	Lithium Ion Batteries	Batteries	Reformat Objections/Responses to Subpoena and input signature block.	(3) Drafting Discovery Answers/Responses	\$225.00 hr	0.35	0.35	\$78.75
03/04/2016	Lithium Ion Batteries	Batteries	Finalize Palo Alto Subpoena Objections; draft Richmond Subpoena Objections; emails to/from L. Weaver regarding same.	(3) Drafting Discovery Answers/Responses	\$225.00 hr	0.90	0.90	\$202.50
03/21/2016	Lithium Ion Batteries	Batteries	Emails from/to S. Cikes and L. Weaver regarding Richmond production documents.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
03/22/2016	Lithium Ion Batteries	Batteries	Emails from/to L. Weaver in preparation for upcoming productions	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	1.00	1.00	\$225.00
03/22/2016	Lithium Ion Batteries	Batteries	Prepare Richmond production documents and cover letter; circulate production to opposing and co-counsel	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.90	0.90	\$202.50
03/22/2016	Lithium Ion Batteries	Batteries	Create Richmond production tracking index; update production e-mail circulation list for Richmond productions.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.25	0.25	\$56.25
03/24/2016	Lithium Ion Batteries	Batteries	Download/save productions to the system and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.30	0.30	\$67.50
03/29/2016	Lithium Ion Batteries	Batteries	Compare original Palo Alto objections to Samsung Amended Depo Notice for changes and email to L. Weaver regarding same.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$225.00 hr	0.30	0.30	\$67.50
03/31/2016	Lithium Ion Batteries	Batteries	Download Palo Alto production and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.30	0.30	\$67.50
04/01/2016	Lithium Ion Batteries	Batteries	Finalize and circulate Palo Alto's Responses and Objections to Defendants' Amended Notice of Deposition; emails to/from L. Weaver regarding same.	(3) Drafting Discovery Answers/Responses	\$225.00 hr	0.20	0.20	\$45.00
04/05/2016	Lithium Ion Batteries	Batteries	Download productions to the system and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.30	0.30	\$67.50
04/11/2016	Lithium Ion Batteries	Batteries	Download production documents to the system and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.15	0.15	\$33.75
04/14/2016	Lithium Ion Batteries	Batteries	Draft shell responses to Defendants' Third Interrogatories and client verification forms; emails to/from L. Weaver, M. Desai regarding same.	(3) Drafting Discovery Answers/Responses	\$225.00 hr	1.60	1.60	\$360.00
04/15/2016	Lithium Ion Batteries	Batteries	Emails from/to M. Desai regarding written discovery.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.15	0.15	\$33.75
05/02/2016	Lithium Ion Batteries	Batteries	Create sample errata forms and email same to L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.40	0.40	\$90.00
05/20/2016	Lithium Ion Batteries	Batteries	Download production documents to the system.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.15	0.15	\$33.75
05/24/2016	Lithium Ion Batteries	Batteries	Draft Notice of Change of Address for L. Weaver and W. Street.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.15	0.15	\$33.75
05/25/2016	Lithium Ion Batteries	Batteries	Download third-party discovery documents to the system.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
06/02/2016	Lithium Ion Batteries	Batteries	Docket search and email communications w. L. Weaver re protective orders.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.20	0.20	\$45.00
06/27/2016	Lithium Ion Batteries	Batteries	Finalize and file notice of change of address for L. Weaver; coordinate production/delivery of chambers copies of same for District and Magistrate Judges per standing orders	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$225.00 hr	0.40	0.40	\$90.00
07/19/2016	Lithium Ion Batteries	Batteries	Emails w. M. Desai regarding Horn expert report.	(11) Litigation Strategy, Analysis & Case Management	\$225.00 hr	0.15	0.15	\$33.75
					<b>Total Labor For Julie Ledwig</b>	<b>8.75</b>	<b>8.75</b>	<b>1968.75</b>
<b>Lesley Weaver</b>								
01/04/2016	Lithium Ion Batteries	Batteries	Prepare for and attend meet and confer with defendants re: discovery responses;	(6) Discovery Meet & Confer	\$700.00 hr	1.10	1.10	\$770.00
01/04/2016	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with co-leads re: proposed deposition dates for public entities and strategy re: discovery;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	1.30	1.30	\$910.00
01/05/2016	Lithium Ion Batteries	Batteries	Confer with counsel for defendants re: deposition notices;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.30	0.30	\$210.00
01/06/2016	Lithium Ion Batteries	Batteries	Coordinate with co-counsel re: meet and confer with defendants and setting of deposition dates;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.10	0.10	\$70.00
01/07/2016	Lithium Ion Batteries	Batteries	Coordinate re: verifications and deposition scheduling;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.10	0.10	\$70.00
01/11/2016	Lithium Ion Batteries	Batteries	Review 30(b)6 notices and coordinate with co-counsel re: drafting objections and conferring with clients as to dates	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$700.00 hr	0.30	0.30	\$210.00
01/11/2016	Lithium Ion Batteries	Batteries	Review 30(b)6 notices- outline issues to object to and confer with Y. Rha	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$700.00 hr	0.30	0.30	\$210.00
01/12/2016	Lithium Ion Batteries	Batteries	Prepare for meet and confer on 30(b)(6) notices; reschedule meet and confer;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.40	0.40	\$280.00
01/13/2016	Lithium Ion Batteries	Batteries	Prepare for meet and confer with defendants re deposition notice;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.30	0.30	\$210.00
01/14/2016	Lithium Ion Batteries	Batteries	Confer with Richmond re: depositions; coordinate with S. Cikes re dep dates;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.40	0.40	\$280.00
01/20/2016	Lithium Ion Batteries	Batteries	Coordinate deposition dates with clients;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.30	0.30	\$210.00
02/07/2016	Lithium Ion Batteries	Batteries	Review and analyze ethics opinion issued by the CA AG re retention of outside counsel;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$700.00 hr	1.20	1.20	\$840.00
02/08/2016	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re deposition prep and scheduling;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.20	0.20	\$140.00
02/09/2016	Lithium Ion Batteries	Batteries	Review 30(b)(6) deposition notice to prepare objections; confer with co-counsel re: same;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$700.00 hr	0.40	0.40	\$280.00

02/09/2016	Lithium Ion Batteries	Batteries	Coordinate re plaintiff depositions;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.20	0.20	\$140.00
02/24/2016	Lithium Ion Batteries	Batteries	Coordinate re deposition scheduling of Sue Hartman for Richmond;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.40	0.40	\$280.00
03/01/2016	Lithium Ion Batteries	Batteries	Coordinate deposition prep with clients after confirming dep dates;	(5) Deposition Defending	7700.00 hr	0.70	0.70	\$490.00
03/02/2016	Lithium Ion Batteries	Batteries	Revise objections to deposition notice; circulate same;	(3) Drafting Discovery Answers/Responses	7700.00 hr	0.30	0.30	\$210.00
03/03/2016	Lithium Ion Batteries	Batteries	Prepare for dep prep with Palo Alto and Richmond;	(5) Deposition Defending	7700.00 hr	1.10	1.10	\$770.00
03/03/2016	Lithium Ion Batteries	Batteries	Prepare outline and documents for client prep session; coordinate re prep session with client and co-counsel;	(5) Deposition Defending	7700.00 hr	3.60	3.60	\$2,520.00
03/04/2016	Lithium Ion Batteries	Batteries	Review document production summary ahead of call to prepare clients for deposition; analyze draft deposition prep outline re: same	(5) Deposition Defending	7700.00 hr	0.50	0.50	\$350.00
03/04/2016	Lithium Ion Batteries	Batteries	Follow up with co-leads re: questions about case development per depositions	(5) Deposition Defending	7700.00 hr	0.40	0.40	\$280.00
03/04/2016	Lithium Ion Batteries	Batteries	Prepare with S Cikes for call with rep from City of Richmond to prepare for deposition;	(5) Deposition Defending	7700.00 hr	1.40	1.40	\$980.00
03/04/2016	Lithium Ion Batteries	Batteries	Prepare outline and meet with 30b6 deponent for Richmond to prepare for deposition; follow up with co-leads re: questions;	(5) Deposition Defending	7700.00 hr	6.70	6.70	\$4,690.00
03/10/2016	Lithium Ion Batteries	Batteries	Revise discovery responses on behalf of public entities; coordinate with S. Cikes re: same; serve discovery;	(3) Drafting Discovery Answers/Responses	7700.00 hr	0.70	0.70	\$490.00
03/11/2016	Lithium Ion Batteries	Batteries	Confer with D. Lambrinos re: deposition defense of public entities; coordinate re: strategies and areas of defense;	(5) Deposition Defending	7700.00 hr	0.70	0.70	\$490.00
03/11/2016	Lithium Ion Batteries	Batteries	Confer with co-lead counsel re: which products contain batteries at issue in litigation;	(5) Deposition Defending	7700.00 hr	0.30	0.30	\$210.00
03/11/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: searches for documents and verification of responses to new discovery requests;	(3) Drafting Discovery Answers/Responses	7700.00 hr	0.50	0.50	\$350.00
03/13/2016	Lithium Ion Batteries	Batteries	Review S. Cikes' notes from 2/5/2014 meeting with Palo Alto;	(5) Deposition Defending	7700.00 hr	0.30	0.30	\$210.00
03/13/2016	Lithium Ion Batteries	Batteries	Review document production and prepare outline for witness prep of 30b6 deponent for Palo Alto;	(5) Deposition Defending	7700.00 hr	4.20	4.20	\$2,940.00
03/14/2016	Lithium Ion Batteries	Batteries	Prepare for and meet with D. Ramberg in Palo Alto for deposition prep;	(5) Deposition Defending	7700.00 hr	6.90	6.90	\$4,830.00
03/15/2016	Lithium Ion Batteries	Batteries	Confer with co-counsel S. Cikes re: Palo Alto document production; confer regarding continuing deposition; follow up with co-leads re: same;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.60	0.60	\$420.00
03/15/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: verifications;	(3) Drafting Discovery Answers/Responses	7700.00 hr	0.10	0.10	\$70.00
03/16/2016	Lithium Ion Batteries	Batteries	Coordinate logistics for document review of Palo Alto documents and efficient production; coordinate with S. Cikes, B. Cibulka, internal team re: plan for production and review;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.80	0.80	\$560.00
03/16/2016	Lithium Ion Batteries	Batteries	Review quotes from document vendors for production of Palo Alto documents; coordinate with co-lead counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.40	0.40	\$280.00
03/17/2016	Lithium Ion Batteries	Batteries	Coordinate with co-lead re: correspondence with Shepherd Mullin re: metadata and document production issues;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.40	0.40	\$280.00
03/17/2016	Lithium Ion Batteries	Batteries	Coordinate upload of data with client Palo Alto and Everlaw for document review and production;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	1.30	1.30	\$910.00
03/17/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for relevance and privilege;	(7) Document Review	7700.00 hr	4.50	4.50	\$3,150.00
03/17/2016	Lithium Ion Batteries	Batteries	Coordinate with B. Cibulka and Everlaw re: uploading data and production of Palo Alto documents with metadata;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.70	0.70	\$490.00
03/19/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for relevance and privilege;	(7) Document Review	7700.00 hr	6.80	6.80	\$4,760.00
03/20/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for relevance and privilege;	(7) Document Review	7700.00 hr	5.60	5.60	\$3,920.00
03/21/2016	Lithium Ion Batteries	Batteries	Prepare for and attend prep sessions with 30b6 deponent for Richmond, S. Hartman, in Richmond;	(5) Deposition Defending	7700.00 hr	7.90	7.90	\$5,530.00
03/21/2016	Lithium Ion Batteries	Batteries	Confer with S. Cikes re: Richmond document production and additional documents to produce;	(5) Deposition Defending	7700.00 hr	0.10	0.10	\$70.00
03/22/2016	Lithium Ion Batteries	Batteries	Coordinate with Palo Alto/D. Ramberg re: rescheduling deposition; communicate with opposing counsel re: same;	(5) Deposition Defending	7700.00 hr	0.60	0.60	\$420.00
03/22/2016	Lithium Ion Batteries	Batteries	Review documents for production on behalf of Palo Alto; coordinate Bates labeling;	(7) Document Review	7700.00 hr	0.40	0.40	\$280.00
03/22/2016	Lithium Ion Batteries	Batteries	Coordinate regarding rolling document production on behalf of Palo Alto; further review of documents; follow up with D. Ramberg re: questions re: documents;	(5) Deposition Defending	7700.00 hr	1.60	1.60	\$1,120.00
03/23/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for responsiveness; coordinate re: document production with B. Cibulka;	(5) Deposition Defending	7700.00 hr	3.60	3.60	\$2,520.00
03/23/2016	Lithium Ion Batteries	Batteries	Coordinate and produce initial document production;	(5) Deposition Defending	7700.00 hr	1.40	1.40	\$980.00
03/24/2016	Lithium Ion Batteries	Batteries	Follow up with co-lead counsel re: case organization and communication;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.50	0.50	\$350.00
03/24/2016	Lithium Ion Batteries	Batteries	Prepare for and meet with Richmond deponent S. Hartman to prepare for deposition;	(5) Deposition Defending	7700.00 hr	5.70	5.70	\$3,990.00
03/25/2016	Lithium Ion Batteries	Batteries	Revise and send letter to co-leads re: case management issues;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.50	0.50	\$350.00
03/25/2016	Lithium Ion Batteries	Batteries	Prepare for and attend 30b6 deposition of Richmond;	(5) Deposition Defending	7700.00 hr	10.40	10.40	\$7,280.00
03/26/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for responsiveness and privilege; code same;	(7) Document Review	7700.00 hr	5.40	5.40	\$3,780.00
03/26/2016	Lithium Ion Batteries	Batteries	Communicate with co-leads re: corrections to motion for class certification;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.40	0.40	\$280.00
03/27/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for responsiveness and privilege; code same;	(7) Document Review	7700.00 hr	4.80	4.80	\$3,360.00
03/28/2016	Lithium Ion Batteries	Batteries	Prepare for and attend call with B. Glackin and S. Williams re: correction to motion for class certification and approach re: same;	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.80	0.80	\$560.00
03/29/2016	Lithium Ion Batteries	Batteries	Revise outline and prepare for meeting with Palo Alto/D. Ramberg to prepare for 30b6 deposition;	(5) Deposition Defending	7700.00 hr	4.30	4.30	\$3,010.00
03/29/2016	Lithium Ion Batteries	Batteries	Review proposal on addressing correction to class cert mot.; coord. with co-leads re same	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.40	0.40	\$280.00
03/29/2016	Lithium Ion Batteries	Batteries	Prepare for and attend call with T. Howzell re: document search and retention	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.70	0.70	\$490.00
03/29/2016	Lithium Ion Batteries	Batteries	Coordinate with co-leads re: proposed correction to motion for class cert	(11) Litigation Strategy, Analysis & Case Management	7700.00 hr	0.40	0.40	\$280.00
04/01/2016	Lithium Ion Batteries	Batteries	Review and analyze motion for preliminary approval of sony settlement; confer with clients re: same; obtain approval and communicate same to co-leads;	(12) Negotiating Settlements	7700.00 hr	0.60	0.60	\$420.00
04/01/2016	Lithium Ion Batteries	Batteries	Prepare for and attend prep session with D. Ramberg for Palo Alto 30b6;	(5) Deposition Defending	7700.00 hr	5.40	5.40	\$3,780.00
04/01/2016	Lithium Ion Batteries	Batteries	Follow up on 3rd document production;	(5) Deposition Defending	7700.00 hr	0.60	0.60	\$420.00
04/01/2016	Lithium Ion Batteries	Batteries	Review and revise objections to dep notice; coordinate service re: same;	(5) Deposition Defending	7700.00 hr	0.20	0.20	\$140.00
04/02/2016	Lithium Ion Batteries	Batteries	Finalize document production on behalf of Palo Alto; circulate production to all counsel;	(5) Deposition Defending	7700.00 hr	1.60	1.60	\$1,120.00
04/02/2016	Lithium Ion Batteries	Batteries	Review and analyze Palo Alto documents for responsiveness and privilege; finalize document set for production;	(5) Deposition Defending	7700.00 hr	4.70	4.70	\$3,290.00
04/03/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for production;	(5) Deposition Defending	7700.00 hr	3.10	3.10	\$2,170.00
04/04/2016	Lithium Ion Batteries	Batteries	Review and analyze supplemental Palo Alto production; prepare for production; coordinate with B. Cibulka and B. Liu re: same;	(5) Deposition Defending	7700.00 hr	3.70	3.70	\$2,590.00
04/04/2016	Lithium Ion Batteries	Batteries	Prep MD re: case status in preparation for defense of Palo Alto deposition;	(5) Deposition Defending	7700.00 hr	0.60	0.60	\$420.00
04/04/2016	Lithium Ion Batteries	Batteries	Review document production on behalf of Palo Alto; circulate production to opposing counsel	(5) Deposition Defending	7700.00 hr	0.50	0.50	\$350.00
04/05/2016	Lithium Ion Batteries	Batteries	Meet with M. Desai and update on case to prepare for defense of Palo Alto deposition;	(5) Deposition Defending	7700.00 hr	0.60	0.60	\$420.00
04/05/2016	Lithium Ion Batteries	Batteries	Review and analyze defendants' third set of document requests; confer with D. Lambrinos re: same; circulate to clients and coordinate with co-counsel re: obtaining responses	(3) Drafting Discovery Answers/Responses	7700.00 hr	0.70	0.70	\$490.00
04/05/2016	Lithium Ion Batteries	Batteries	Coordinate with lead counsel re: filing of erratum on class cert motion;	(8) Drafting Pleadings, Briefs & Pretrial Motions	7700.00 hr	0.30	0.30	\$210.00
04/07/2016	Lithium Ion Batteries	Batteries	Confer with clients and with lead counsel re: defendants' request for identification of every product in municipalities' possession that contains a lithium ion battery	(10) Class Certification/Experts	7700.00 hr	0.60	0.60	\$420.00

04/10/2016	Lithium Ion Batteries	Batteries	Review documents for final Palo Alto doc production; verify same and attention logistics of production;	(10) Class Certification/Experts	\$700.00 hr	1.30	1.30	\$910.00
04/12/2016	Lithium Ion Batteries	Batteries	Coordinate with opposing counsel re: meet and confer re: new set of discovery requests;	(3) Drafting Discovery Answers/Responses	\$700.00 hr	0.10	0.10	\$70.00
04/15/2016	Lithium Ion Batteries	Batteries	Coordinate with opposing counsel re: need to continue Palo Alto deposition;	(5) Deposition Defending	\$700.00 hr	0.20	0.20	\$140.00
04/18/2016	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re: dep prep with D. Ramberg and rescheduling of dep; deal with conflict issue and rescheduling;	(5) Deposition Defending	\$700.00 hr	0.90	0.90	\$630.00
04/21/2016	Lithium Ion Batteries	Batteries	Coordinate with D. Lambrinos re: logistics of deposition; discuss latest tactics of defendants re: prepping witnesses;	(5) Deposition Defending	\$700.00 hr	0.20	0.20	\$140.00
04/21/2016	Lithium Ion Batteries	Batteries	Follow up with Akin Gump re: potential conflict issue and obtaining waiver from LG Chem;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.30	0.30	\$210.00
04/25/2016	Lithium Ion Batteries	Batteries	Confirm waiver of any conflict from LG Chem for M. Desai;	(5) Deposition Defending	\$700.00 hr	0.30	0.30	\$210.00
04/25/2016	Lithium Ion Batteries	Batteries	Review interrogatory responses and verifications; coordinate with clients re: same to confirm accuracy and verifications; coordinate service of same;	(3) Drafting Discovery Answers/Responses	\$700.00 hr	0.80	0.80	\$560.00
04/25/2016	Lithium Ion Batteries	Batteries	Meet with M. Desai re: preparation for defense of Palo Alto deposition;	(5) Deposition Defending	\$700.00 hr	0.90	0.90	\$630.00
04/26/2016	Lithium Ion Batteries	Batteries	Coordinate with co-counsel re: follow up discovery and search for responsive materials; review and revise draft of interrogatory response; review documents forwarded by co-counsel to confirm previous production;	(5) Deposition Defending	\$700.00 hr	1.20	1.20	\$840.00
04/26/2016	Lithium Ion Batteries	Batteries	Travel to, meet with D. Ramberg to prepare for deposition;	(5) Deposition Defending	\$700.00 hr	5.70	5.70	\$3,990.00
04/27/2016	Lithium Ion Batteries	Batteries	Prepare for defense of Palo Alto in deposition; attn logistics and last minute preparation/issues;	(5) Deposition Defending	\$700.00 hr	2.40	2.40	\$1,680.00
04/28/2016	Lithium Ion Batteries	Batteries	Prepare for and defend deposition of Palo Alto;	(5) Deposition Defending	\$700.00 hr	12.40	12.40	\$8,680.00
04/29/2016	Lithium Ion Batteries	Batteries	Follow up re: discovery issues raised in deposition, including identification of location products containing batteries;	(5) Deposition Defending	\$700.00 hr	0.90	0.90	\$630.00
04/29/2016	Lithium Ion Batteries	Batteries	Email M. Stump, City Attorney of Palo Alto, re: deposition outcome; follow up with D. ramberg re: same;	(5) Deposition Defending	\$700.00 hr	0.50	0.50	\$350.00
05/01/2016	Lithium Ion Batteries	Batteries	Confirm call with Palo Alto's IT personnel to identify products containing product;	(10) Class Certification/Experts	\$700.00 hr	0.10	0.10	\$70.00
05/02/2016	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with Palo Alto re: identification of products containing batteries at issue; confer with M. Desai re: same; develop strategy for response;	(10) Class Certification/Experts	\$700.00 hr	1.30	1.30	\$910.00
05/02/2016	Lithium Ion Batteries	Batteries	Request additional time from opposing counsel for Richmond to review transcript due to Ms. Hartman's medical procedure;	(3) Drafting Discovery Answers/Responses	\$700.00 hr	0.10	0.10	\$70.00
05/02/2016	Lithium Ion Batteries	Batteries	Follow up with client re: errata in deposition transcript; identifying products containing batteries; and production of documents in electronic form; coordinate with client and M. Desai re: same;	(10) Class Certification/Experts	\$700.00 hr	0.80	0.80	\$560.00
05/03/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: amending interrogatory responses;	(10) Class Certification/Experts	\$700.00 hr	0.40	0.40	\$280.00
05/03/2016	Lithium Ion Batteries	Batteries	Consult with expert re: establishing uniformity in purchasing practices of municipalities;	(10) Class Certification/Experts	\$700.00 hr	0.80	0.80	\$560.00
05/05/2016	Lithium Ion Batteries	Batteries	Confer with inhouse counsel at Richmond re production of documents with metadata;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.40	0.40	\$280.00
05/05/2016	Lithium Ion Batteries	Batteries	Confer with S. Moore re: search for products containing lithium ion batteries; coordinate with co-counsel re: same;	(10) Class Certification/Experts	\$700.00 hr	0.40	0.40	\$280.00
05/05/2016	Lithium Ion Batteries	Batteries	Follow up with client re: responses to follow on interrogatories;	(3) Drafting Discovery Answers/Responses	\$700.00 hr	0.30	0.30	\$210.00
05/06/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: search for evidence in response to follow up discovery; coordinate re: same;	(10) Class Certification/Experts	\$700.00 hr	0.70	0.70	\$490.00
05/06/2016	Lithium Ion Batteries	Batteries	Coordinate with M. Desai re: client site visit on Monday: goals, strategies, etc.;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.60	0.60	\$420.00
05/08/2016	Lithium Ion Batteries	Batteries	Follow up re: meeting with Palo Alto on Monday, 5/9, to determine location of products; confer with M. Desai and S. Cikes re: same;	(10) Class Certification/Experts	\$700.00 hr	0.40	0.40	\$280.00
05/12/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: additional searches;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.20	0.20	\$140.00
05/12/2016	Lithium Ion Batteries	Batteries	Follow up with co-counsel re: search for products and producing documents with metadata on behalf of Richmond; coordinate with M. Desai re: same;	(10) Class Certification/Experts	\$700.00 hr	0.50	0.50	\$350.00
05/17/2016	Lithium Ion Batteries	Batteries	Confer with clients re: supplemental interrogatory responses; review draft dogs and new verifications; coordinate with M. Desai and counsel or clients re: same;	(10) Class Certification/Experts	\$700.00 hr	1.60	1.60	\$1,120.00
05/19/2016	Lithium Ion Batteries	Batteries	Follow up with T. Howzell at Palo Alto re: additional SAP report;	(10) Class Certification/Experts	\$700.00 hr	0.40	0.40	\$280.00
05/24/2016	Lithium Ion Batteries	Batteries	Confer with opposing counsel re: confidential designations of transcripts;	(6) Discovery Meet & Confer	\$700.00 hr	0.10	0.10	\$70.00
06/02/2016	Lithium Ion Batteries	Batteries	Confer with co-leads re: responding to arguments in defendants' opposition to class certification;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.20	0.20	\$140.00
06/16/2016	Lithium Ion Batteries	Batteries	Analyze areas to shore up regarding representation of government entities as subclass; coordinate with co-leads re: conference call to discuss;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.20	0.20	\$140.00
06/16/2016	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with S. Williams re: strategy on reply;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.40	0.40	\$280.00
06/21/2016	Lithium Ion Batteries	Batteries	Confer with M. Desai re: drafting insert for class cert reply; research re: purchases of government entities, per conversation with S. Williams;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.50	0.50	\$350.00
06/21/2016	Lithium Ion Batteries	Batteries	Follow up with co-leads re: waiver of conflict to Orrick as counsel to third party;	(11) Litigation Strategy, Analysis & Case Management	\$700.00 hr	0.30	0.30	\$210.00
					<b>Total Labor For Lesley Weaver</b>	<b>168.70</b>	<b>168.70</b>	<b>\$118,090.00</b>
<b>Mill Desai</b>								
04/04/2016	Lithium Ion Batteries	Batteries	Discussion of case background and procedural posture with L. Weaver (0.5).	(11) Litigation Strategy, Analysis & Case Management	\$575.00 hr	0.50	0.50	\$287.50
04/05/2016	Lithium Ion Batteries	Batteries	Call with S. Cikes re document production issues (0.3). Discussion with L. Weaver re same (0.1). Review of background documents and analysis of class certification issues (1.2).	(11) Litigation Strategy, Analysis & Case Management	\$575.00 hr	1.60	1.60	\$920.00
04/06/2016	Lithium Ion Batteries	Batteries	Review of deposition transcript of Hartman deposition transcript (2.0). Review of motion to certify class (1.0).	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$575.00 hr	3.00	3.00	\$1,725.00
04/11/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition through review of prior transcripts, development of outline, and review of filings.	(5) Deposition Defending	\$575.00 hr	5.50	5.50	\$3,162.50
04/12/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition (0.9).	(5) Deposition Defending	\$575.00 hr	0.90	0.90	\$517.50
04/13/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition: review of deposition notice and objections; review of class certification motion; discussion with L. Weaver re same.	(1) Investigations, Factual Research	\$575.00 hr	2.10	2.10	\$1,207.50
04/14/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition. Drafting interrogatory responses for Richmond and Palo Alto. Discussion with L. Weaver re interrogatory responses and factual case background.	(5) Deposition Defending	\$575.00 hr	8.70	8.70	\$5,002.50
04/15/2016	Lithium Ion Batteries	Batteries	Preparation for depo prep session with Palo Alto. Review of Palo Alto purchasing framework, Richmond deposition, pleadings, and document discovery. Call with S. Cikes re deposition topics and areas of preparation. Call with L. Weaver re same.	(5) Deposition Defending	\$575.00 hr	7.20	7.20	\$4,140.00
04/25/2016	Lithium Ion Batteries	Batteries	Drafting and finalizing interrogatory responses (1.1).	(3) Drafting Discovery Answers/Responses	\$575.00 hr	1.10	1.10	\$632.50
04/26/2016	Lithium Ion Batteries	Batteries	Amending previously served interrogatories (1.2). Meeting with D. Ramberg in preparation for City of Palo Alto's 30(b)(6) deposition (4.5).	(5) Deposition Defending	\$575.00 hr	5.70	5.70	\$3,277.50
04/28/2016	Lithium Ion Batteries	Batteries	Defending deposition of David Ramberg/City of Palo Alto (8.4).	(5) Deposition Defending	\$575.00 hr	8.40	8.40	\$4,830.00
05/03/2016	Lithium Ion Batteries	Batteries	Meeting with L. Weaver regarding next steps in case (1.5). Coordinating return of errata sheet with City of Richmond (0.6). Call with City of Richmond re document productions and discovery next steps (0.6).	(1) Investigations, Factual Research	\$575.00 hr	2.70	2.70	\$1,552.50
05/04/2016	Lithium Ion Batteries	Batteries	Discussion with L. Weaver re discovery responses and follow up with S. Cikes and clients re same.	(6) Discovery Meet & Confer	\$575.00 hr	0.50	0.50	\$287.50
05/05/2016	Lithium Ion Batteries	Batteries	Discussion with client re document search procedures and location of laptops.	(6) Discovery Meet & Confer	\$575.00 hr	0.80	0.80	\$460.00
05/06/2016	Lithium Ion Batteries	Batteries	Call with Palo Alto re identification of laptops.	(6) Discovery Meet & Confer	\$575.00 hr	0.80	0.80	\$460.00

05/09/2016	Lithium Ion Batteries	Batteries	Meeting with Palo Alto to determine location of laptops and responding to Defendants second set of interrogatories.	(3) Drafting Discovery Answers/Responses	\$575.00 hr	6.20	6.20	\$3,565.00
05/10/2016	Lithium Ion Batteries	Batteries	Review of Richmond deposition errata.	(3) Drafting Discovery Answers/Responses	\$575.00 hr	0.50	0.50	\$287.50
05/11/2016	Lithium Ion Batteries	Batteries	Sending Richmond errata sheet to defense counsel. Review of objection to settlement.	(3) Drafting Discovery Answers/Responses	\$575.00 hr	1.20	1.20	\$690.00
05/15/2016	Lithium Ion Batteries	Batteries	Coordinating upload of Richmond documents for re-production to defendants.	(7) Document Review	\$575.00 hr	0.20	0.20	\$115.00
05/16/2016	Lithium Ion Batteries	Batteries	Drafting interrogatory answers. Liaising with S. Cikes re document productions. Conversations with client re SAP report. Conversations with client re verification of rog responses.	(3) Drafting Discovery Answers/Responses	\$575.00 hr	3.10	3.10	\$1,782.50
05/17/2016	Lithium Ion Batteries	Batteries	Review of Richmond documents for production with metadata (4.5). Liaising with client re SAP report (0.7).	(7) Document Review	\$575.00 hr	5.20	5.20	\$2,990.00
05/18/2016	Lithium Ion Batteries	Batteries	Review of electronic Richmond documents for production with metadata.	(7) Document Review	\$575.00 hr	5.10	5.10	\$2,932.50
05/19/2016	Lithium Ion Batteries	Batteries	Review of Richmond documents for production with metadata and coordinating production (2.8).	(7) Document Review	\$575.00 hr	2.80	2.80	\$1,610.00
06/09/2016	Lithium Ion Batteries	Batteries	Review of class cert opposition.	(11) Litigation Strategy, Analysis & Case Management	\$575.00 hr	1.30	1.30	\$747.50
06/14/2016	Lithium Ion Batteries	Batteries	Research related to class cert reply.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$575.00 hr	4.70	4.70	\$2,702.50
06/20/2016	Lithium Ion Batteries	Batteries	Research relating to class cert reply	(5) Deposition Defending	\$575.00 hr	2.80	2.80	\$1,610.00
06/20/2016	Lithium Ion Batteries	Batteries	Attended deposition of Mitsunori Masunaga	(5) Deposition Defending	\$575.00 hr	1.50	1.50	\$862.50
06/21/2016	Lithium Ion Batteries	Batteries	Research related to class cert reply. Research on topics for expert research and testimony.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$575.00 hr	5.60	5.60	\$3,220.00
06/22/2016	Lithium Ion Batteries	Batteries	Drafting local government reply to class certification opposition.	(8) Drafting Pleadings, Briefs & Pretrial Motions	\$575.00 hr	4.50	4.50	\$2,587.50
06/23/2016	Lithium Ion Batteries	Batteries	Research on possible areas of expert testimony on class cert reply.	(11) Litigation Strategy, Analysis & Case Management	\$575.00 hr	1.70	1.70	\$977.50
07/15/2016	Lithium Ion Batteries	Batteries	Email traffic with L. Weaver and D. Lambrinos re Horn deposition.	(10) Class Certification/Experts	\$575.00 hr	0.50	0.50	\$287.50
07/18/2016	Lithium Ion Batteries	Batteries	Research related to laptop purchases of Richmond and Palo Alto. Development of outline for Horn deposition.	(10) Class Certification/Experts	\$575.00 hr	7.80	7.80	\$4,485.00
07/19/2016	Lithium Ion Batteries	Batteries	Factual research related to ascertainability issue. Drafting of questions for expert Horn depo. Drafting questions for expert Guerin-Calvert depo. Email traffic with D. Lambrinos and L. Weaver re same.	(1) Investigations, Factual Research	\$575.00 hr	6.20	6.20	\$3,565.00
07/20/2016	Lithium Ion Batteries	Batteries	Call with D. Lambrinos re expert deposition. Follow up with laptop purchase information for Palo Alto and Richmond.	(1) Investigations, Factual Research	\$575.00 hr	2.80	2.80	\$1,610.00
07/21/2016	Lithium Ion Batteries	Batteries	Review of Palo Alto and Richmond depositions for testimony relevant to class cert reply. Requesting and distributing deposition exhibits	(10) Class Certification/Experts	\$575.00 hr	2.80	2.80	\$1,610.00
07/22/2016	Lithium Ion Batteries	Batteries	Call with J. Friedman re class cert expert depositions and strategy. Follow up with info regarding municipal entities. Attended deposition of expert Q. Horn.	(10) Class Certification/Experts	\$575.00 hr	5.20	5.20	\$2,990.00
07/26/2016	Lithium Ion Batteries	Batteries	Email traffic with D. Lambrinos re ascertainability issue.	(10) Class Certification/Experts	\$575.00 hr	0.70	0.70	\$402.50
07/27/2016	Lithium Ion Batteries	Batteries	Searching for supporting testimony for class cert reply.	(10) Class Certification/Experts	\$575.00 hr	0.80	0.80	\$460.00
07/28/2016	Lithium Ion Batteries	Batteries	Communications with clients regarding laptop and battery information for class cert reply.	(10) Class Certification/Experts	\$575.00 hr	3.50	3.50	\$2,012.50
07/29/2016	Lithium Ion Batteries	Batteries	Compiling battery and cell information for class cert reply.	(10) Class Certification/Experts	\$575.00 hr	5.50	5.50	\$3,162.50
08/01/2016	Lithium Ion Batteries	Batteries	Communications with client and information gathering for class cert reply.	(10) Class Certification/Experts	\$575.00 hr	3.80	3.80	\$2,185.00
08/04/2016	Lithium Ion Batteries	Batteries	Follow up with J. Friedman re expert dep.	(10) Class Certification/Experts	\$575.00 hr	0.20	0.20	\$115.00
08/05/2016	Lithium Ion Batteries	Batteries	Attended Guerin-Calvert deposition.	(10) Class Certification/Experts	\$575.00 hr	9.10	9.10	\$5,232.50
08/10/2016	Lithium Ion Batteries	Batteries	Identifying Richmond and Palo Alto testimony for class cert reply.	(10) Class Certification/Experts	\$575.00 hr	2.30	2.30	\$1,322.50
08/11/2016	Lithium Ion Batteries	Batteries	Communications with D. Lambrinos regarding information from Richmond and Palo Alto needed for class cert reply. Research related to same.	(10) Class Certification/Experts	\$575.00 hr	5.20	5.20	\$2,990.00
08/15/2016	Lithium Ion Batteries	Batteries	Follow up with D. Lambrinos re relevant Palo Alto and Richmond testimony.	(10) Class Certification/Experts	\$575.00 hr	0.60	0.60	\$345.00
08/16/2016	Lithium Ion Batteries	Batteries	Follow up re amended interrogatories.	(10) Class Certification/Experts	\$575.00 hr	0.20	0.20	\$115.00
08/17/2016	Lithium Ion Batteries	Batteries	Email traffic and TCs with D. Lambrinos and client regarding additional information needed to determine cell types.	(10) Class Certification/Experts	\$575.00 hr	2.10	2.10	\$1,207.50
08/18/2016	Lithium Ion Batteries	Batteries	Follow up with Richmond regarding laptop information necessary to determine cell type.	(10) Class Certification/Experts	\$575.00 hr	1.60	1.60	\$920.00
08/19/2016	Lithium Ion Batteries	Batteries	Follow up with client regarding laptop information. Email traffic with D. Lambrinos re same.	(10) Class Certification/Experts	\$575.00 hr	2.80	2.80	\$1,610.00
					<b>Total Labor For Mill Desai</b>	<b>159.60</b>	<b>159.60</b>	<b>\$91,770.00</b>
<b>Whitney Street</b>								
03/21/2016	Lithium Ion Batteries	Batteries	Review/revise letter.	(11) Litigation Strategy, Analysis & Case Management	\$675.00 hr	0.20	0.20	\$135.00
03/28/2016	Lithium Ion Batteries	Batteries	Discuss case with L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	\$675.00 hr	0.25	0.25	\$168.75
04/25/2016	Lithium Ion Batteries	Batteries	Discuss case with L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	\$675.00 hr	0.20	0.20	\$135.00
					<b>Total Labor For Whitney Street</b>	<b>0.65</b>	<b>0.65</b>	<b>\$438.75</b>
<b>Yunah Rha</b>								
01/11/2016	Lithium Ion Batteries	Batteries	Review Richmond & PA depo notices, ROGs, Req. for Production of Docs	(3) Drafting Discovery Answers/Responses	\$395.00 hr	6.50	6.50	\$2,567.50
01/12/2016	Lithium Ion Batteries	Batteries	Review depo notices and draft objections to depo notice for PA & Richmond	(5) Deposition Defending	\$395.00 hr	7.50	7.50	\$2,962.50
01/13/2016	Lithium Ion Batteries	Batteries	Revise and complete objections to depo notice; Attend meet & confer call; draft M&C letter; correspond with LW re same;	(5) Deposition Defending	\$395.00 hr	6.50	6.50	\$2,567.50
02/11/2016	Lithium Ion Batteries	Batteries	Review batteries document analysis; correspond with LW re same	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	\$395.00 hr	0.20	0.20	\$79.00
02/17/2016	Lithium Ion Batteries	Batteries	Manage e-files and organize work product into firm filing system	(11) Litigation Strategy, Analysis & Case Management	\$395.00 hr	1.00	1.00	\$395.00
					<b>Total Labor For Yunah Rha</b>	<b>21.70</b>	<b>21.70</b>	<b>\$ 8,571.50</b>

Grand Total 397.90 \$ 234,314.00

# **EXHIBIT E**

**EXHIBIT E**

In re Lithium Ion Batteries Antitrust Litigation

**BLOCK & LEVITON LLP**

Reported Expenses Incurred on Behalf of IPPs

**EXPENSE REPORT**

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Attorney Service	
Litigation Assessment	\$100,000.00
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	\$51.51
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw/PACER	\$32.80
Messenger/Delivery	\$110.00
Photocopies – In House (capped at \$0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	\$89.02
Travel	\$148.40
Miscellaneous	\$2,050.38
<b>TOTAL:</b>	\$102,482.11