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18 *Co-Lead Counsel for Direct Purchaser Plaintiffs*

19 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 20 **OAKLAND DIVISION**

21 IN RE: LITHIUM ION BATTERIES
 22 ANTITRUST LITIGATION

Case No. 13-md-02420-YGR
 MDL No. 2420

DECLARATION OF JAMES PAGE, ESQ.
REGARDING DISTRIBUTION OF
SETTLEMENT FUNDS

24 This Document Relates to:

25 *All Direct Purchaser Actions*

Judge: Hon. Yvonne Gonzalez Rogers
 Courtroom: 1

1 I, James E. Page, hereby declare as follows:

2 1. I am a Senior Project Manager employed by Epiq Class Actions & Claims
3 Solutions, Inc. (“Epiq”), the Settlement Administrator for the direct purchaser actions in the
4 above-captioned case. Epiq began working on this matter in March of 2016. I have worked for
5 Epiq and GCG, a company acquired by Epiq in 2018, since 2013. I am a licensed attorney in
6 Washington. I received my Juris Doctor degree from the University of Oklahoma Law School
7 in 2006 and my Bachelor of Arts degree from the University of Oklahoma in 2003. The
8 following statements are based on my personal knowledge and information provided by other
9 Epiq employees working under my supervision, and if called on to do so, I could and would
10 testify competently thereto. I submit this Declaration regarding the distribution of Settlement
11 Funds in accordance with the Court’s December 14, 2020 Corrected Order Authorizing
12 Distribution of Settlement Funds.

13 2. On January 28, 2021 Epiq mailed checks to 8,745 eligible Class Members. The
14 8,745 checks had a total value of \$91,520,463.98. All payments were made by paper check.

15 3. The average (mean) recovery per eligible Class Member is \$10,465.46. The
16 median recovery per eligible Class Member is \$10.00. The largest amount paid to an eligible
17 Class Member is \$20,909,715.22. The smallest amount paid to an eligible Class Member is
18 \$10.00.

19 4. As of February 18, 2021, 2,720 payments remain uncashed. The total value of
20 these uncashed checks is \$4,283,525.30. The void date of all checks is April 28, 2021.

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22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on February 18, 2021 at Seattle, Washington.


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By: 

JAMES PAGE
Senior Project Manager
Epiq Class Action & Claims Solutions