

EXHIBIT C

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13 *Interim Co-Lead Counsel for Direct Purchaser Plaintiffs*

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE: LITHIUM ION BATTERIES
ANTITRUST LITIGATION

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

19
20 This Document Relates to:
21 ALL DIRECT PURCHASER CLASS
22 ACTIONS

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF
EXPENSES, AND INCENTIVE AWARDS**

1 I, R. Alexander Saveri, declare and state as follows:

2 1. I am the managing partner of the law firm of Saveri & Saveri, Inc. (the “Saveri
3 Firm” or “Saveri”). I submit this declaration in support of Direct Purchaser Plaintiffs’ (“DPPs”)
4 application for an award of attorneys’ fees and reimbursement of expenses in connection with the
5 services rendered in this litigation. I make this Declaration based on my own personal knowledge,
6 and if called as a witness, I could and would competently testify to the matters stated herein.

7 2. I am one of the attorneys principally responsible for the handling of this matter. On
8 May 17, 2013, this Court appointed the Saveri Firm as interim co-lead counsel for all Direct
9 Purchaser Plaintiffs. ECF No. 194.

10 3. My firm has served as counsel to Ritz Camera & Image, LLC; Charles Carte;
11 Nichole M. Gray; Ron Nelson, Jr.; Terri Walner; and Michael S. Wilson; and as counsel for the
12 Direct Purchaser Class (“Class”) throughout the course of this litigation. The background and
13 experience of the Saveri Firm and its attorneys are summarized in the *curriculum vitae* attached
14 hereto as Exhibit 1.

15 4. The Saveri Firm has prosecuted this litigation solely on a contingent-fee basis, and
16 has been at risk that it would not receive any compensation for prosecuting claims against the
17 Defendants. While the Saveri Firm devoted its time and resources to this matter, it has foregone
18 other legal work for which it could have been compensated.

19 5. The Saveri Firm has performed extensive work in this litigation, and has worked
20 hand in hand with co-counsel Pearson, Simon & Warshaw, LLP (“PSW”) and Berman Tabacco
21 (“BT”) to prosecute this litigation.

22 **INVESTIGATIONS AND COMMENCEMENT OF THE ACTION**

23 6. The Saveri Firm started its investigation into this matter in June of 2011. This
24 investigation included, among other things, reviewing industry materials regarding the lithium ion
25 battery industry, researching industry data, and retaining consultants to review the economic
26 evidence of the alleged conspiracy. On October 11, 2012, the Saveri Firm filed the first and
27 second cases in the country on behalf of direct purchasers of lithium ion batteries alleging

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1 violations of the antitrust laws in the Northern District of California: *Carte v. Samsung SDI Co.,*
2 *Ltd., et al.*, No. 12-5268 YGR, and *Gray v. Samsung SDI Co., Ltd., et al.*, No. 12-5274 YGR. In
3 total, the Saveri Firm represents six of the original twenty-five DPPs coordinated in this MDL.

4 7. The Saveri Firm effected service of its clients' complaints on Defendants. As to
5 several, we initiated the procedures for international service of process set forth in the Hague
6 conventions, including the translation of the complaint into Korean by a Saveri Firm paralegal.

7 8. The Saveri Firm attorneys prepared briefing in connection with the JPML
8 proceedings to request transfer of all actions to the Northern District of California. On January 31,
9 2013, I attended the MDL hearing in Orlando, Florida.

10 9. After the JPML transferred all actions to this Court, the Saveri Firm immediately
11 began organizing the leadership structure of the three firms. On March 18, 2013, the Saveri Firm
12 held a meeting of all counsel representing all Direct Purchaser Plaintiffs at its office to organize
13 the case.

14 10. On May 17, 2013, the Court appointed me, along with Bruce L. Simon of Pearson,
15 Simon & Warshaw, LLP ("PSW") and Joseph J. Tabacco, Jr. of Berman DeValerio, now known
16 as Berman Tabacco ("BT"), as Interim Lead Class Counsel for Direct Purchaser Plaintiffs. ECF
17 No. 194. In this capacity, I and members of my firm have been involved in every aspect of this
18 litigation.

19 **LITIGATION STRATEGY, ANALYSIS, CASE MANAGEMENT**

20 11. I and members of my firm, along with PSW and BT, determined and carried out the
21 overall strategy for the prosecution of this action. This involved extensive research, collaboration
22 and decision-making based on decades of experience litigating similar antitrust matters.

23 12. The Saveri Firm, along with PSW and BT, made and oversaw work assignments to
24 other DPP firms.

25 **DISCOVERY**

26 13. Throughout this litigation, Saveri Firm attorneys participated in proffers in which
27 the Antitrust Criminal Penalty Enhancement and Reform Act of 2004 ("ACPERA") applicant

1 provided information about the conspiracy. These proffers began before DPPs filed their
2 consolidated complaint.

3 14. The Saveri Firm assisted in the negotiation of the discovery and deposition
4 protocol, entered as ECF No. 905, and, along with other DPP counsel, drafted and propounded
5 numerous requests for production of documents and interrogatories.

6 15. The Saveri Firm was responsible for all aspects of discovery against Defendants
7 LG Chem, Ltd. and LG Chem America, Inc. (together “LG Chem”) on behalf of DPPs. Saveri
8 Firm attorneys, along with counsel for IPPs:

- 9 • Analyzed all of LG Chem’s discovery responses;
- 10 • Met and conferred extensively with counsel for LG Chem—represented by three
11 successive firms—regarding the adequacy of its discovery responses;
- 12 • Memorialized the meet and confer negotiations in letters to LG Chem counsel;
- 13 • Briefed and argued unresolved matters before Magistrate Judge Ryu; and
- 14 • As a result of these efforts, obtained additional discovery to which DPPs were entitled.

15 16. Saveri Firm attorneys, along with counsel for IPPs, selected and negotiated the LG
16 Chem custodians, and litigated issues in connection with the employee watchlist.

17 17. Saveri Firm attorneys, along with DPP co-counsel and IPP counsel, filed motions
18 to compel against LG Chem, including:

- 19 • Joint Letter Brief re LG Chem’s Interrogatory Response, ECF No. 644 (Feb. 6, 2015);
- 20 • Joint Letter Brief re LG Chem’s Interrogatory Response, ECF No. 745 (July 24, 2015);
- 21 • Joint Letter Brief re Compelling LG Chem to Produce Seok Hwan Kwak for
22 Deposition, ECF No. 764 (Aug. 7, 2015);
- 23 • Joint Letter Brief re LG Chem’s Data Preservation and Documents Used to Refresh
24 Deponent’s Recollection, ECF No. 977 (Nov. 24, 2015); and
- 25 • Joint Letter Brief re Documents LG Chem is Withholding as Privileged, ECF No. 995
26 (Dec. 17, 2015).

27 Magistrate Judge Ryu granted all of these motions, with the exception of the last, and all were

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1 affirmed by the Court.

2 18. The Saveri Firm, along with other DPP counsel, assisted class representatives in
3 responding to the discovery propounded by Defendants, and successfully opposed discovery of
4 class representatives' downstream information.

5 19. The Saveri Firm, along with other DPP counsel, sought discovery of certain
6 Defendants' telephone records, including LG Chem's.

7 20. Saveri Firm attorneys undertook a forensic analysis, and hired an expert, to
8 determine issues regarding spoliation and preservation of evidence.

9 **DOCUMENT REVIEW AND DEPOSITIONS**

10 21. The Saveri Firm attorneys performed senior-level quality control of first-level
11 coding of documents productions of LG Chem and other defendants. A Saveri Firm paralegal, a
12 bilingual native Korean speaker, was assigned to review, analyze, code and translate documents
13 produced in Korean for the purposes of drafting complaints, responding to discovery, preparing
14 for depositions of various Defendants and their employees, and in support of class certification.

15 22. The Saveri Firm took the lead role in conducting seven merits depositions of
16 employees of LG Chem, Samsung SDI and Hitachi Maxell, including: Dongwoo (Donny) Lee;
17 Seiji Sumoto; Jae Jeong (did not appear); Michinori Sawai; Jae Jeong Joe; Jangwon Huh; Jae Gil
18 Kim aka Albert Kim; and Duk Yong Kwon aka Paul Kwon. The Saveri Firm also participated in
19 the preparation or second-chaired six depositions of employees from LG Chem, Samsung SDI,
20 Sony Corporation and NEC Tokin, including: Yong Ook (Andrew) Chung aka Yong Wook Chun
21 (first deposition); Young Sun Kim; Yong Ook (Andrew) Chung aka Yong Wook Chun (second
22 deposition); Jun Yeol Youn; Mitsunori Masunaga; and Kazunari Takeshima.

23 23. In preparation for taking depositions, Saveri Firm attorneys, with the support of a
24 Korean language paralegal, analyzed and translated thousands of documents and drafted questions.

25 24. The Saveri Firm attorneys coordinated the defense of all class representative
26 depositions among DPP class counsel and defended the deposition of class representative Charles
27 Carte.

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1 25. The Saveri Firm attorneys also met and conferred with counsel for defendants
2 regarding the topics for depositions taken pursuant to Rule 30(b)(6) of the Federal Rules of Civil
3 Procedure.

4 **PLEADINGS AND BRIEFING**

5 26. Saveri Firm attorneys drafted or contributed to almost all of the pleadings and
6 briefs filed by DPPs in this action. Among other things, Saveri Firm attorneys:

- 7 • Filed and served six separate complaints: *Carte v. Samsung SDI Co., Ltd., et al.*, No.
8 12-5268 YGR, filed Oct. 11, 2012, *Gray v. Samsung SDI Co., Ltd., et al.*, No. 12-5274
9 YGR, filed Oct. 11, 2012; *Nelson v. Samsung SDI Co., Ltd., et al.*, No. 12-05516 YGR,
10 filed Oct. 25, 2012; *Wilson v. Samsung SDI Co., Ltd., et al.*, No. 12-6210 YGR, filed
11 Dec. 7, 2012; *Ritz Camera & Image, LLC v. Samsung SDI Co., Ltd., et al.*, No. 13-
12 0213 YGR; filed Jan. 15, 2013; and *Walner v. Samsung SDI Co., Ltd., et al.*, No. 13-
13 1298 MEJ, filed March 22, 2013;
- 14 • Prepared briefing in connection with proceedings before the JPML, including a
15 memorandum in support of centralization of pre-trial proceedings in this District;
- 16 • Contributed to DPPs' opposition to Defendants' motion to stay proceedings;
- 17 • Contributed extensively to the drafting and filing of the consolidated amended
18 complaint ("CAC") and the second consolidated amended complaint ("SCAC");
- 19 • Coordinated, oversaw and drafted, with PSW and BT attorneys, DPPs' oppositions to
20 two rounds of motions to dismiss;
- 21 • Drafted, along with PSW and BT, the motion and reply brief in support of class
22 certification; and
- 23 • Had primary responsibility for drafting and filing all briefing in connection with
24 settlement approval.

25 27. As noted above, the Saveri Firm attorneys briefed multiple discovery matters
26 before Magistrate Judge Ryu.

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1 43. Each Class Representative spent time reviewing and responding to three sets of
2 document requests containing a total of 74 separate document requests. Each Class Representative
3 participated in the collection of responsive hard copy documents and, in some cases, identification
4 of ESI sources likely to contain responsive data, if applicable. These document requests required
5 the Class Representatives to search for and produce both hard copy and, in certain circumstances,
6 electronic documents from multiple sources.

7 44. Each Class Representative was required to review and respond to three sets of
8 interrogatories totaling 27 separate interrogatories, requiring sworn certifications on multiple
9 occasions.

10 45. The Class Representatives kept abreast of the major filings in the case, including
11 reviewing briefs and pleadings; and consulting with class counsel regarding litigation strategy,
12 settlement negotiations, and other matters.

13 46. Each of the Class Representatives spent a significant amount of time preparing for
14 and being deposed.

15 47. During the class period, Ritz Camera was the largest national retail camera chain
16 with over 1,200 stores at its peak and an online retail subsidiary. Along with Circuit City, Ritz
17 Camera is one of the two largest corporate class representatives in terms of purchases from
18 Defendants.

19 48. Ritz Camera has been in bankruptcy since 2012. The Ritz Camera Trustee, Alfred
20 Giuliano and his outside bankruptcy counsel, David Carickhoff, a partner in the law firm Archer &
21 Greiner, P.C. in Wilmington, Delaware, diligently followed the litigation through the many years
22 of this litigation. I had regular calls and meetings with Messrs. Guiliano and Carickhoff, along
23 with my DPP co-counsel Steven Benz and Bill Conyngham, partners at the Kellogg Hansen firm
24 in Washington, DC, who were directly responsible for representing Ritz Camera in discovery
25 matters in this litigation.

26 49. Ritz Camera held numerous phone calls with Kellogg Hansen lawyers to answer
27 questions regarding the storage of data and documents. Ritz Camera's Trustee, Alfred Guiliano,
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1 arranged for on-site meetings of his accounting staff with DPP counsel from the Kellogg Hansen
2 firm during multiple warehouse reviews and during attempts to retrieve electronic information
3 from backup tape collections. Ritz Camera, and its former executives, devoted significant time to
4 assist DPP counsel with background and technical assistance prior to the production of documents,
5 and to assist in the formulation of expert analysis. This assistance was especially important
6 because certain issues spanned two Ritz Camera bankruptcies within the class period.

7 50. As a convenience to Defendants, Ritz Camera processed, scanned and produced its
8 supplemental paper document production in lieu of making the documents available at the
9 warehouse in New Jersey. Ritz Camera and its former executives also assisted with the preparation
10 of responses to Defendants' written discovery requests.

11 51. Ritz Camera also expended considerable effort in connection with preparing for
12 and sitting for depositions. Defendants deposed David Dimont, a former employee who was Ritz
13 Camera's 30(b)(6) corporate designee, in both his individual and corporate representative
14 capacities not once, but twice, in depositions on April 21, 2016 (in Los Angeles) and May 26,
15 2016 (in San Francisco). In addition, the Ritz Camera Trustee, Alfred Guiliano, prepared
16 extensively and sat for a full day deposition on May 29, 2016 (in Philadelphia).

17 **ATTORNEYS' FEES AND EXPENSES**

18 52. Attached hereto as Exhibit 2 is my firm's total hours and lodestar, computed at
19 historical rates, for the period of June 1, 2013 through August 31, 2017. This period reflects the
20 time spent after the appointment of Interim Co-Lead Counsel and Liaison Counsel for Direct
21 Purchased Plaintiffs in this litigation. The total number of hours spent by the Saveri Firm during
22 this period of time was 13,117.40, with a corresponding lodestar of \$5,522,710.00. My firm's
23 lodestar figures are based on the firm's historical billing rates which do not include charges for
24 expense items. Expense items are billed separately and such charges are not duplicated in my
25 firm's billing rates. This summary was prepared from contemporaneous, daily time records
26 regularly prepared and maintained by my firm. The lodestar amount reflected in Exhibit 2 is for
27 work performed by professionals at my law firm for the benefit of the Class.

1 53. The Saveri Firm has reviewed the time and expense records that form the basis of
2 this declaration to correct any billing errors. In addition, my firm has removed all time entries and
3 expenses related to the following:

- 4 a. time spent reading or reviewing pleadings, ECF notices or other papers
5 unless a necessary part of performing a specific assignment;
- 6 b. travel time unless the attorney or professional was actively engaged in
7 preparation or work in connection with a particular assignment which necessitated travel;
- 8 c. billing for time connected with creating timekeeping records or for the time
9 of attorneys or staff expended in preparation of audited time records and expenses in support of
10 DPPs' application for an award of attorneys' fees and reimbursement of expenses.

11 54. The hourly rates for the attorneys and professional support staff in my firm
12 included in Exhibit 2 are the same as the regular rates charged for their services in non-contingent
13 matters and/or which have been accepted in other complex or class action litigation, except that
14 certain rates have been reduced to comply with the caps established by DPP Co-Lead Counsel, as
15 follows:

- 16 a. rates for Attorneys at the highest Partner level are capped at \$850 per hour;
- 17 b. rates for Of Counsel/Special Counsel are capped at \$650 per hour;
- 18 c. rates for Associate Attorneys are capped at \$450 per hour;
- 19 d. rates for Associate Attorneys engaged in English-language document
20 review are capped at \$350 per hour; \$400 per hour is permitted where the reviewer has special
21 skill set, such as foreign language translation, and Lead Counsel has approved the work
22 performed; and
- 23 e. rates for Paralegals and investigators are capped at \$175 per hour; a cap of
24 \$200 per hour was permitted for foreign language translation abilities.

25 55. My firm has expended a total of \$45,651.65 in unreimbursed costs and expenses in
26 connection with the prosecution of this litigation. These costs and expenses are broken down in
27 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs


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1 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
2 action are reflected on the books and records of my firm. These books and records are prepared
3 from expense vouchers, check records and other source materials and represent an accurate
4 recordation of the expenses incurred.

5 56. The Saveri Firm paid a total of \$210,000.00 in assessments for the joint prosecution
6 of the litigation against the Defendants.

7 57. My firm has carefully reviewed the time and expenses that comprise its reported
8 lodestar and out of pocket expenses and represents that such lodestar and expenses comply with all
9 material applicable terms of the May 21, 2013 letter from Co-Lead Counsel regarding Protocols
10 for Maintaining and Reporting Time and Expense as well as Modified Pretrial Order No. 1 with
11 Exhibit A (ECF No. 202, May 24, 2013).

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed on this 7th day of February, 2018 at San Francisco,
14 California.

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16 R. Alexander Saveri

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EXHIBIT 1

SAVERI & SAVERI, INC.
706 SANSOME STREET
SAN FRANCISCO, CALIFORNIA 94111
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SAVERI & SAVERI, INC., an AV-rated law firm, was established in 1959. The firm engages in Antitrust and Securities litigation, Product Defect cases, and in general civil and trial practice. For over fifty years the firm has specialized in complex, multidistrict, and class action litigation.

PARTNERS

R. ALEXANDER SAVERI, born San Francisco, California, July 22, 1965; admitted to bar, 1994, California and U.S. District Court, Northern District of California; 1995, U.S. Court of Appeals, Ninth Circuit; 2000, U.S. District Court, Southern District of California and U.S. District Court, Central District of California; 2012, U.S. Court of Appeals, Third Circuit. *Education*: University of Texas at Austin (B.B.A., Finance 1990); University of San Francisco School of Law (J.D., 1994), University of San Francisco Maritime Law Journal 1993–1994. *Member*: State Bar of California; American Bar Association (Member, Antitrust Section); Association of Trial Lawyers of America; University of San Francisco Inn of Court; National Italian American Bar Association; University of San Francisco Board of Governors (2003–2006); Legal Aid Society (Board of Directors).

Mr. Saveri is the managing partner of Saveri & Saveri, Inc. After graduating from law school, he began working for his father and uncle at Saveri & Saveri, P.C. on antitrust and complex litigation. The current practice of Saveri & Saveri, Inc. emphasizes class action antitrust litigation.

He has the highest rating in Martindale Hubbell, namely, “AV.”

Mr. Saveri has served or is serving as court-appointed Co-Lead or Liaison Counsel in the following cases:

In re Lithium Ion Batteries Antitrust Litigation, Case No. 13-md-2420-YGR, United States District Court, Northern District of California. Mr. Saveri serves as one of three Co-Lead counsel in an antitrust class action on behalf of direct purchasers of lithium ion batteries.

In re California Title Insurance Antitrust Litigation, Case No. 08-01341 JSW, United States District Court, Northern District of California (antitrust class action involving federal antitrust laws and California statutory law for unlawful practices concerning payments for title insurance in California).

In re Intel Corp. Microprocessor Antitrust Litigation, MDL No. 05-1717 (JJF) United States District Court, District of Delaware (antitrust class action on behalf of all consumers in the United States that indirectly purchased Intel x86 microprocessors).

In re Vitamin C Antitrust Litigation, MDL No. 06-1738 (DTG)(JO), United States District Court, Eastern District Of New York (antitrust class action on behalf of all California indirect purchasers of vitamin C).

In re Polychloroprene Antitrust Cases, J.C.C.P. No. 4376, Los Angeles Superior Court (antitrust class action on behalf of all California indirect purchasers of polychloroprene rubber).

In re NBR Cases, J.C.C.P. No. 4369, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of NBR).

Carpinelli. v. Boliden AB, Master File No. CGC-04-435547, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of copper tubing).

Competition Collision Center, LLC v. Crompton Corporation, Case No. CGC-04-431278, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of plastic additives).

In re Urethane Cases, J.C.C.P. No. 4367, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of urethane and urethane chemicals).

The Harman Press v. International Paper Co., (Consolidated Cases) Master File No. CGC-04-432167, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of publication paper).

In re Label Stock Cases, J.C.C.P. No. 4314, San Francisco Superior Court (antitrust class action on behalf of all California indirect purchasers of high pressure label stock).

Richard Villa v. Crompton Corporation, Consolidated Case No. CGC-03-419116, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of EPDM).

Russell Reidel v. Norfalco LLC, Consolidated Case No. CGC-03-418080, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of sulfuric acid).

Smokeless Tobacco Cases I-IV, J.C.C.P. Nos. 4250, 4258, 4259 and 4262, San Francisco Superior Court (certified antitrust class action on behalf of California consumers of smokeless tobacco products).

Electrical Carbon Products Cases, J.C.C.P. No. 4294, San Francisco Superior Court (Private Entity Cases) (antitrust class action on behalf of California indirect purchasers of electrical carbon products).

The Vaccine Cases, J.C.C.P. No. 4246, Los Angeles Superior Court (medical monitoring class action on behalf of children exposed to mercury laden vaccines).

In re Laminate Cases, J.C.C.P. No. 4129, Alameda Superior Court (antitrust class action on behalf of California indirect purchasers of high pressure laminate).

Compact Disk Cases, J.C.C.P. No. 4123, Los Angeles Superior Court (antitrust class action on behalf of California consumers of prerecorded compact disks).

Sorbate Prices Cases, J.C.C.P. No. 4073, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of sorbate).

In re Flat Glass Cases, J.C.C.P. No. 4033, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of flat glass products).

Vitamin Cases, J.C.C.P. No. 4076, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of vitamins).

California Indirect Purchaser MSG Antitrust Cases, Master File No. 304471, San Francisco Superior Court (antitrust class action on behalf of California indirect purchasers of Monosodium Glutamate).

In re Aspartame Indirect Purchaser Antitrust Litigation, Master Docket No. 06-1862-LDD, United States District Court, Eastern District of Pennsylvania (antitrust class action on behalf of California indirect purchasers of aspartame); and

GM Car Paint Cases, J.C.C.P. No. 4070, San Francisco Superior Court (class action on behalf of all California owners of General Motors vehicles suffering from paint delamination).

GUIDO SAVERI, born San Francisco, California, June 10, 1925; admitted to bar, 1951, California. *Education*: University of San Francisco (B.S., *summa cum laude*, 1947; LL.B., *summa cum laude*, 1950). *Member*: Bar Association of San Francisco; State Bar of California; American Bar Association (Member, Antitrust Section); Lawyers Club of San Francisco.

Mr. Saveri is a senior partner in the firm of Saveri & Saveri, Inc. He started the firm in 1959 and associated with Joseph L. Alioto, Esq., San Francisco, California, in the practice of antitrust and other corporate litigation. After law school in 1951 and up until the forming of his firm in 1959 he was associated with the law firm of Pillsbury, Madison & Sutro, San Francisco, California.

He has the highest rating in Martindale Hubbell, namely, "AV."

Mr. Saveri has testified before the Federal Judiciary Committee on antitrust matters and has lectured on antitrust matters before The Association of Trial Lawyers of America, the Federal Practice Institute, and other lawyer associations. Mr. Saveri has also written various periodicals on antitrust topics. Mr. Saveri was named the 2007 Antitrust Lawyer of the Year by the State Bar of California's Antitrust and Unfair Competition Law Section.

From the time he started his firm in 1959, Mr. Saveri has devoted practically all of his time to antitrust and other corporate and complex litigation. He has actively participated in antitrust cases involving the electronics industry, electrical industry, the water meter industry, scrap metal industry, liquid asphalt industry, dairy products industry, typewriter industry, vanadium industry, pipe-fitting industry, grocery business, liquor industry, movie industry, animal-raising business, chemical industry, snack food industry, paper label industry, chrysanthemum industry, drug industry, sugar industry, records industry, industrial gas industry, wheelchair industry, rope industry, copper tubing industry, folding cartons industry, ocean shipping industry, pancreas gland industry, corrugated container industry, glass container

industry, fine paper industry, food additives industry, prescription drugs industry, medical x-ray film industry, computer chips and many others.

RICHARD SAVERI, Partner, 1951–1999.

LISA SAVERI, born San Francisco, California, April 10, 1956; admitted to bar, 1983, California and U.S. District Court, Northern District of California; 1987, U.S. District Court, Eastern District of California; 2002, U.S. Court of Appeals, Ninth Circuit, U.S. District Court, Central District of California and U.S. District Court, Southern District of California. *Education*: Stanford University (A.B. Economics, 1978); University of San Francisco School of Law (J.D., 1983), University of San Francisco Law Review. *Member*: State Bar of California. *Experience*: Legal Extern, Hon. Eugene F. Lynch, Judge, U. S. District Court, Northern District of California (1982); Associate, Pillsbury Madison & Sutro (1983–1992); San Francisco Public Defender’s Office (Summer 1989). *Publications*: G. Saveri & L. Saveri, Pleading Fraudulent Concealment In An Antitrust Price Fixing Case: Rule 9(b) v. Rule 8, 17 U.S.F. L. Rev. 631 (1983); L. Saveri, Implications of the Class Action Fairness Act for Antitrust Cases: From Filing Through Trial, 15 No. 1, *Competition: J. of the Antitrust and Unfair Competition Law Section of the State Bar of California* 23 (2006); L. Saveri & Co-Author, Does the Cartwright Act Have A Future?, 17 No. 2, *Competition: J. of the Antitrust and Unfair Competition Law Section of the State Bar of California* 31 (2008); L. Saveri & Co-Authors, Chapter 21: Class Actions in Competition and Consumer Protections Cases in California State Antitrust and Unfair Competition Law 773-822 (Cheryl Lee Johnson, ed., Matthew Bender & Co., 2009) and 2010 update; L. Saveri & Co-Authors, Chapter 22: Indirect Purchaser Actions in California State Antitrust and Unfair Competition Law (Cheryl Lee Johnson, ed., Matthew Bender & Co., Supp. 2010); LexisNexis Corporate & Securities Law Community Podcast, *Class Actions in Competition and Consumer Protection Cases* (Recorded Sept. 21, 2010). *Professional Affiliations*: U. S. District Court, Northern District of California, Special Master, Standing Committee on Professional Conduct (appointment)(2008–2011); State Bar of California, Antitrust and Unfair Competition Law Section, Executive Committee, Member (appointment)(2005–2010), Secretary (2007–2009), First Vice-Chair (2009–2010), Advisory Committee (2010–present).

CADIO ZIRPOLI, born Washington D.C., September 1, 1967; admitted to bar, 1995, California and U.S. District Court, Northern District of California; 2015, U.S. Court of Appeals, Ninth Circuit. *Education*: University of California, Berkeley (B.A., 1989); University of San Francisco School of Law (J.D., *cum laude*, 1995). *Experience*: Assistant District Attorney, City and County of San Francisco 1996–2000. *Member*: State Bar of California.

Mr. Zirpoli has an AV Preeminent Peer Review Rating on Martindale-Hubbell, and has been named a “Super Lawyer for Northern California” in 2010, 2014–2017.

OF COUNSEL

GEOFFREY C. RUSHING, born San Jose, California, May 21, 1960; admitted to bar, 1986, California and U.S. District Court, Northern District of California. *Education*: University of California, Berkeley (A.B. with honors, 1982); University of California, Berkeley, Boalt Hall (J.D., 1986). *Member*: State Bar of California.

ASSOCIATES

MATTHEW D. HEAPHY, born Hartford, Connecticut, December 4, 1974, admitted to bar, 2003, California and U.S. District Court, Northern District of California. *Education*: Wesleyan University (B.A., 1997); University of San Francisco School of Law (J.D., *cum laude*, 2003); University of San Francisco Law Review; International & Comparative Law Certificate, with Honors. *Publications*: Comment: The Intricacies of Commercial Arbitration in the United States and Brazil: A Comparison of Two National Arbitration Statutes, 37 U.S.F. L. Rev. 441 (2003); M. Heaphy & Co-Author, Does the United States Really Prosecute its Servicemembers for War Crimes? Implications for Complementarity Before the ICC, 21 Leiden J. Int'l L. 165 (March 2008); M. Heaphy, The United States and the 2010 Review Conference of the Rome Statute of the ICC, 81 Int'l Rev. Penal L. 77 (2010). *Member*: State Bar of California. *Languages*: French, Italian.

MELISSA SHAPIRO, born Los Angeles, California, May 27, 1980, admitted to bar, 2006, California and U.S. District Court, Northern and Central Districts of California. *Education*: University of Southern California (B.A., 2002); Pepperdine University School of Law (J.D., 2005), Pepperdine Law Review, *Publication*: Comment, Is Silica the Next Asbestos? An Analysis of the Sudden Resurgence of Silica Lawsuit Filings, 32 Pepp. L. Rev. 983 (2005).

DAVID HWU, born Stanford, California, November 20, 1985; admitted to bar, 2012, California and U.S. District Court, Northern District of California. *Education*: University of California, Berkeley (B.A., 2008). University of San Francisco School of Law (J.D., 2011). *Member*: State Bar of California. *Languages*: Chinese, Japanese.

SARAH VAN CULIN, born London, England, September 2, 1985, admitted to bar, 2013, California; 2015, U.S. District Court, Northern District of California. *Education*: University of Nottingham (B.A., English, 2007); University of San Francisco School of Law (J.D., *cum laude*, 2013); Editor in Chief, University of San Francisco Law Review; Business Law Certificate, with Honors. *Member*: State Bar of California, Antitrust, UCL and Privacy Section; American Bar Association, Section of Antitrust Law; Bar Association of San Francisco, Antitrust and Business Regulation Section.

FORMER ASSOCIATES

CARL N. HAMMARSKJOLD, born Detroit, Michigan, August 20, 1967; admitted to bar, 2011, California, and U.S. District Court, Northern District of California; 2013, U.S. Court of Appeals, Ninth Circuit. *Education*: Pomona College (B.A., 1989); University of San Francisco School of Law (J.D., *summa cum laude*, 2011); Academic Excellence Award; John L. Brennan Award for Creativity and Innovation in Advocacy; Law Review Best Student Note Award; University of San Francisco Law Review (2009–2011); Executive Director, Moot Court Board of Directors (2010–2011); Judicial Extern to the Hon. William Alsup, Judge, U. S. District Court, Northern District of California (2010). *Publication*: Comment, Smokes, Candy, and the Bloody Sword: How Classifying Jailhouse Snitch Testimony as Direct, Rather than Circumstantial, Evidence Contributes to Wrongful Convictions, 45 U.S.F. L. Rev. 1103 (2011). *Member*: State Bar of California.

WILLIAM J. HEYE, born Boston, Massachusetts, April 14, 1975 admitted to bar, 2004, California, and U.S. District Court, Northern and Central District of California. *Education*: Brown University (B.A. 1997); University Of California, Hastings College of the Law (J.D. *cum laude* 2004) Hastings International and Comparative Law Review. *Publication*: Note, Forum Selection for International Dispute Resolution in China—Chinese Courts vs. CIETAC, 27 Hastings Int'l & Comp. L. Rev. 535 (Spring 2004).

TRAVIS L. MANFREDI, born Fresno, California, March 16, 1980, admitted to bar January 2012, California and U.S. District Court, Northern District of California. *Education*: University of California, Santa Cruz (B.A. 2004); University of San Francisco School of Law (J.D., *cum laude*, 2011); University of San Francisco Law Review Managing Editor, Vol. 45; Member of National Appellate Advocacy Competition team; Research assistant to Professor J. Thomas McCarthy, author of McCarthy on Trademarks and Unfair Competition. *Publications*: Survey, In re Spirits Int'l, N.V., 563 F.3d 1347 (Fed. Cir. 2009), 14 Intell. Prop. L. Bull. 71 (2009); Note, Sans Protection: Typeface Design and Copyright in the Twenty-First Century, 45 U.S.F. L. Rev. 841 (2011). *Member*: State Bar of California.

LEGAL ASSISTANTS

SHANNON EASTERLY (Paralegal), born Elko, Nevada, February 27, 1986. *Education*: California State University, Northridge (B.A., 2009).

FORMER LEGAL ASSISTANTS

DAVID DORR (Paralegal), born Philadelphia, Pennsylvania. *Education*: Arizona State University (B.S. 1987); Thunderbird, The American Graduate School of International Management, (MBA 1998); The Chase Manhattan Bank, N.A. New York, New York, Senior

Institutional Trust Administrator, 1990–1995; Charles Schwab Company, San Francisco, Trust Associate, 1996; Independent Corporate Marketing and Personal Finance consultant 1998–2002.

JAE HYUN LIM (Paralegal), born Incheon, South Korea, July 9, 1988. *Education:* University of California, Berkeley (B.A., 2011), Team Waffle Intern Research Analyst (2011). *Language:* Korean.

MICHAELA OGDEN (Paralegal), born San Diego, California, March 1, 1990. *Education:* University of Washington (B.A. 2012 with honors).

ADDITIONAL LEADERSHIP POSITIONS

The following are some of the class actions in which Mr. Guido Saveri actively participated:

Nisley v. Union Carbide and Carbon Corp., 300 F. 2d 561 (10th Cir. 1960), and *Continental Ore. Co. v. Union Carbide and Carbon Corp.*, 370 U.S. 690 (1962). In 1960, Mr. Saveri was one of the trial attorneys in the above cases which are the forerunners of present class action litigation and are responsible not only for Rule 23 as it exists today but also for some of the more important rulings in the field of antitrust law. The *Nisley* case was a class action tried before a jury both on liability and damages and resulted in a verdict for the named plaintiffs and the entire class. It is considered one of the leading cases on class actions, is often referred to as a model for the trial of class actions, and has been followed in those antitrust class action cases which have gone to trial.

Sacramento Municipal Utility District v. Westinghouse Elec. Corp., 1962 Trade Case. ¶ 70,552 (N.D. Cal. 1962). Mr. Saveri was one of the principal attorneys in several cases which have come to be known as the *Electrical Equipment* cases. In 1961–1965, Mr. Saveri represented such clients as the State of Washington, Sacramento Municipal Utility District and Modesto Irrigation District. Mr. Saveri was one of the attorneys who tried several of these cases and did very extensive work under a coordinated program instituted by the Murrah Committee under the direction of the then Chief Justice of the United States. This Committee later became the Judicial Panel for Multi-District Litigation. As a result of his experience in these cases, he participated in drafting proposed legislation creating the Panel on Multi-District Litigation.

Nurserymen's Exchange v. Yoda Brothers, Inc., before Judge George R. Harris in San Francisco. Mr. Saveri was the sole attorney for a class of 10,000 chrysanthemum growers. This case was settled for substantial sums.

City of San Diego v. Rockwell Manufacturing Co., before Judge George H. Boldt of San Francisco. Mr. Saveri was Liaison and Lead Counsel in the above case involving water meters. This case was settled for substantial sums.

In re Private Civil Treble Damage Actions Against Certain Snack Food Companies, Civil No. 70-2121-R, in the United States District Court, Central District of California. Mr. Saveri was the lead attorney for the retail grocers' class comprised of all retail grocers in the states of California, Nevada, and Arizona certified by Judge Real involving the snack food industry. The case was settled for substantial sums.

In re Sugar Antitrust Litigation, MDL No. 201, in the United States District Court for the Northern District of California, before Judges Boldt and Cahn. Mr. Saveri was the lead attorney for the retail grocer classes in the Western Sugar litigation. In this litigation, he was a member of the Executive Committee, Steering Committee and Settlement Committee. This case settled for more than \$35,000,000.

Sun Garden Packing Co. v. International Paper Co., et al., C-72-52, United States District Court in San Francisco. In 1972 Mr. Saveri filed the first price fixing class action against the paper industry. He was the sole attorney representing all purchasers of lithograph paper labels in the United States. The lithograph paper labels case was settled at a substantial figure.

The lithograph paper labels case was responsible for subsequent government indictments in lithograph paper labels, folding cartons, small paper bags, and corrugated containers.

In re Folding Carton Antitrust Litigation, MDL No. 250, Eastern District of Illinois, Judges Will and Robson. Mr. Saveri was a member of the Executive Committee, Vice Chairman of Discovery and a member of the Trial Team in this action involving a horizontal conspiracy to fix prices for folding cartons. The case was settled for more than \$200,000,000.

In re Coordinated Pretrial Proceedings in Antibiotic Antitrust Actions, MDL No. 10, 4-72 Civ 435; Judge Lord, United States District Court, District of Minnesota, Fourth Division. Mr. Saveri was the attorney for the institutional class and consumer class for the States of Utah and Hawaii. These actions were settled for substantial sums.

Building Service Union Health & Welfare Trust Fund v. Chas. Pfizer & Co., No. 4-71 Civ. 435; No. 4-71 Civ. 413, before Judge Lord in Minneapolis, Minnesota. Mr. Saveri was the sole attorney for a class of 9,000 health and welfare trust funds in the United States in this antitrust action against the drug companies. In 1974–1975 this class action went to trial before two juries at the same time and in the same court on liability and damages for the entire class and lasted ten months. It was settled for a substantial sum. Mr. Saveri was the sole attorney representing the plaintiff health and welfare trust fund class at trial.

In re Corrugated Container Antitrust Litigation, MDL No. 310, Southern District of Texas. Horizontal price fixing action. The case was settled for more than \$400,000,000.

In re Fine Paper Antitrust Litigation, MDL No. 325, Eastern District of Pennsylvania. Mr. Saveri was a member of the Executive Committee and the trial team. The case was settled for approximately \$80,000,000.

In re Ocean Shipping Antitrust Litigation, MDL No. 395, Southern District of New York. Mr. Saveri was a member of the Steering Committee and the Negotiating Committee. The firm understands this case was the first class action settlement involving claims by foreign companies. Mr. Saveri was appointed an officer of the New York Federal District Court to audit foreign claims in Europe. The case was settled for approximately \$79,000,000.

In re Corn Derivatives Antitrust Litigation, MDL No. 414, United States District Court for the District of New Jersey. Mr. Saveri was Chairman of the Steering Committee and Executive Committee.

In re Coconut Oil Antitrust Litigation, MDL No. 474, Northern District of California. Mr. Saveri was Co-Lead Counsel.

In re Intel Securities Litigation, No.C-79-2168A, Northern District of California, Judge Aguilar. Mr. Saveri was a member of the Steering Committee.

O'Neill Meat Co. v. Eli Lilly and Co., No. 30 C 5093, United States District Court for the Northern District of Illinois, Judge Holderman. Mr. Saveri was Co-Lead Counsel for the class in this antitrust litigation involving pancreas glands.

United National Records, Inc. v. MCA, Inc., No.82 C 7589, United States District Court for the Northern District of Illinois; Mr. Saveri was a member of the Steering Committee in this records antitrust litigation. The class recovered \$26,000,000 in cash and assignable purchase certificates.

In re Industrial Gas Antitrust Litigation, No. 80 C 3479, United States District Court for the Northern District of Illinois. Mr. Saveri was a member of the Steering Committee. The class recovered more than \$50,000,000.

Superior Beverages, Inc. v. Owens-Illinois, No. 83-C512, United States District Court for the Northern District of Illinois; Mr. Saveri was a member of the Executive Committee in this antitrust litigation involving the price fixing of glass containers. The class recovered in excess of \$70,000,000 in cash and coupons.

In re Washington Public Power Supply Securities Litigation, MDL No. 551, (W.D. Wash.). Mr. Saveri was one of the court appointed attorneys for the class.

In re Ask Computer Systems Securities Litigation, No. C-85-20207 (A) RPA, United States District Court for the Northern District of California. Mr. Saveri was Co-Lead Counsel for the class.

Big D. Building Corp. v. Gordon W. Wattles., MDL No. 652, United States District Court for the Middle District of Pennsylvania. Mr. Saveri was a member of the Steering Committee and Settlement Committee in this price fixing class action involving the rope industry.

In re Insurance Antitrust Litigation, MDL No. 767, Judge Schwarzer, United States District Court for the Northern District of California. Mr. Saveri was Administrative Liaison Counsel and a member of the Steering Committee.

In re Sun Microsystems Securities Litigation, No. C-89-20351 RMW, United States District Court for the Northern District of California; Mr. Saveri was Co-Lead Counsel.

In re Infant Formula Antitrust Litigation, MDL No. 878, United States District Court for the Northern District of Florida, Tallahassee Division. Mr. Saveri was one of the principal attorneys. The case was settled for \$125,760,000.

In re Carbon Dioxide Industry Antitrust Litigation, MDL No. 878, Case No. 92-940 PHB, United States District Court for the Middle District of Florida, Orlando Division. Mr. Saveri was a member of the Steering Committee. The class recovered \$53,000,000 and achieved significant therapeutic relief for the class.

In re Medical X-Ray Film Antitrust Litigation, No. CV 93-5904, FB, United States District Court for the Eastern District of New York. Mr. Saveri was a member of the Steering Committee.

In re Baby Food Antitrust Litigation, No. 92-5495 NHP, in the United States District Court for the District of New Jersey. Mr. Saveri was a member of the Steering Committee.

In re Brand Name Prescription Drugs Antitrust Litigation, MDL No. 997, Case No. 94-C-897 CPK, United States District Court, Northern District of Illinois, Eastern Division. Mr. Saveri was Co-Lead Counsel on behalf of approximately 50,000 retail pharmacies nationwide alleging an illegal cartel between seventeen drug manufacturers and six drug wholesalers in preventing discounts to retail pharmacies. The case was tried for eight weeks. The case was settled for \$700,000,000 in cash and \$25,000,000 in product. Mr. Saveri was one of four lead trial lawyers.

In re Citric Acid Antitrust litigation, MDL No. 1092, C-95-2963 FMS, United States District Court, Northern District of California. Mr. Saveri was Co-Lead Counsel representing a certified class of purchasers of citric acid throughout the United States against the citric acid manufacturers for violations of the Sherman Act for fixing the price of citric acid in the United States and around the world. The case was settled for \$86,000,000.

In re Methionine Antitrust Litigation, MDL No. 1311 CRB, United States District Court, Northern District of California. A nationwide class action on behalf of direct purchasers of methionine alleging price-fixing. Saveri & Saveri, Inc. served as Co-Lead Counsel in this litigation. The case was settled for \$107,000,000.

In re Managed Care Litigation, MDL No. 1334, Master File No. 00-1334-MD (Judge Moreno), United States District Court, Southern District of Florida. The Saveri Firm served as a member of the Executive Committee representing the California Medical Association, Texas Medical Association, Georgia Medical Association and other doctors against the nation's HMOs for violations of the Federal RICO Act. The case was settled with benefits approximating \$1 billion dollars.

In re Dynamic Random Access Memory Antitrust Litigation, MDL No. 1486 (Judge Hamilton), United States District Court, Northern District of California. Mr. Saveri served as Co-Lead Counsel on behalf of direct purchasers of dynamic random access memory (DRAM) alleging a nationwide class for price-fixing. The case settled for more than \$325 million in cash.

In re Flash Memory Antitrust Litigation, No. C 07-0086 SBA (Judge Armstrong), United States District Court, Northern District of California. Mr. Saveri served as Co-Lead Counsel on behalf of direct purchasers of flash memory (Flash) alleging a nationwide class for price-fixing.

In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917, Case No. C 07-5944 SC (Judge Conti) United States District Court, Northern District of California. Mr. Saveri serves as Lead Counsel on behalf of direct purchasers of cathode ray tubes (CRTs) alleging a nationwide class for price-fixing.

In re Optical Disk Drive (ODD) Products Antitrust Litigation, MDL No. 2143, 10-md-02143-RS (Judge Seeborg), United States District Court, Northern District of California. Mr. Saveri served as Chair of the Committee of Direct Purchaser Plaintiffs' Counsel on behalf of direct purchasers of optical disk drives (ODDs) alleging a nationwide class for price-fixing.

CLASS ACTION LITIGATION

The following are some additional class action cases in which the firm of Saveri & Saveri, Inc. actively participated as class counsel:

In re NASDAQ Market-Makers Antitrust Litigation, MDL No. 1023, United States District Court, Southern District of New York. A nationwide class action on behalf of purchasers of securities on the NASDAQ market alleging a violation of the Sherman Act for fixing the spread between the quoted buy and sell prices for the securities sold on the NASDAQ market.

In re Potash Antitrust Litigation, MDL No. 981, United States District Court, District of Minnesota, Third Division. A class action on behalf of all direct purchasers of potash throughout the United States alleging a horizontal price fix.

In re Airline Ticket Commission Antitrust Litigation, MDL No. 1058, United States District Court, District of Minnesota. A class action alleging that the major airlines conspired to fix travel agents' commission rates.

Pharmaceutical Cases I, II & III, J.C.C.P. Nos. 2969, 2971 & 2972, San Francisco Superior Court. A certified class action on behalf of all California consumers against the major drug manufacturers for fixing the price of all brand name prescription drugs sold in California.

Perish v. Intel Corp., Civ. No. 755101, Santa Clara Superior Court. A nationwide class action on behalf of purchasers of Intel Pentium chips alleging consumer fraud and false advertising.

In re Carpet Antitrust Litigation, MDL No. 1075, United States District Court, Northern District of Georgia, Rome Division. A nationwide class action on behalf of all direct purchasers of polypropylene carpet alleging a horizontal price fix.

In re California Indirect-Purchaser Plasticware Antitrust Litigation, Civ. Nos. 961814, 963201, 963590, San Francisco Superior Court. A class action on behalf of indirect purchasers of plasticware alleging price-fixing.

In re Worlds of Wonder Securities Litigation; No.C-87-5491 SC, United States District Court, Northern District of California.

Pastorelli Food Products, Inc. v. Pillsbury Co., et al., No. 87C 20233, United States District Court, Northern District of Illinois.

Red Eagle Resources Corp., et al. v. Baker Hughes Incorporated, et al., No. 91-627 (NWB) (Drill Bits Litigation) United States District Court, Southern District of Texas, Houston Division.

In re Wirebound Boxes Antitrust Litigation, MDL No. 793, United States District Court, District of Minnesota, Fourth Division. A nationwide class action on behalf of purchasers of wirebound boxes alleging a horizontal price fix.

In re Bulk Popcorn Antitrust Litigation, No. 3-89-710, United States District Court, District of Minnesota, Third Division. A nationwide class action on behalf of direct purchasers of bulk popcorn alleging price-fixing.

Nancy Wolf v. Toyota Sales, U.S.A. and Related Cases, No. C 94-1359, MHP, 1997 WL 602445 (N.D. Cal. 1997), United States District Court, Northern District of California. A

Mark Notz v. Ticketmaster - Southern, and Related Cases, No. 943327, San Francisco Superior Court. A consumer class action alleging a territorial allocation in violation of the Cartwright Act.

Neve Brothers v. Potash Corp., No. 959867, San Francisco Superior Court. A class action alleging price-fixing on behalf of indirect purchasers of potash in California.

In re Chrysler Corporation Vehicle Paint Litigation, MDL No. 1239. Nationwide class action on behalf of owners of delaminating Chrysler vehicles.

Miller v. General Motors Corp., Case No. 98 C 7836, United States District Court, Northern District of Illinois. Nationwide class action alleging a defective paint process which causes automobile paint to peel off when exposed to ordinary sunlight.

ANTITRUST LITIGATION

The following list outlines some of the antitrust litigation in which the firm of Saveri & Saveri has been involved:

1. *Union Carbide & Carbon Corp. v. Nisley*, 300 F. 2d 561 (10th Cir. 1960)
2. *Continental Ore. Co. v. Union Carbide and Carbon Corp.*, 370 U.S. 690 (1962)
3. *Public Service C. of N.M. v. General Elec. Co.*, 315 F.2d 306 (10th Cir. 1963)
4. *State of Washington v. General Elec. Co.*, 246 F. Supp. 960 (W.D. Wash. 1965)
5. *Nurserymen's Exchange v. Yoda Brothers, Inc.*
6. *Bel Air Markets v. Foremost Dairies Inc.*, 55 F.R.D. 538 (N.D. Cal. 1972)
7. *In re Western Liquid Asphalt Case*, 487 F.2d 191 (9th Cir. 1973)
8. *In re Gypsum Cases*, 386 F. Supp. 959 (N.D. Cal. 1974)
9. *City of San Diego v. Rockwell Manufacturing Co.*
10. *In re Private Civil Treble Damage Actions Against Certain Snack Food Companies*, Civil No. 70-2121-R
11. *In re Sugar Antitrust Litigation*, MDL No. 201, 559 F.2d 481 (9th Cir. 1977)
12. *Sun Garden Packing Co. v. International Paper Co.*, No. C-72-52
13. *In re Folding Carton Antitrust Litigation*, MDL No. 250
14. *In re Coordinated Pretrial Proceedings in Antibiotic Antitrust Actions*, No. 4-72 Civ 435, 410 F. Supp. 706 (D. Minn. 1975)
15. *Building Service Union Health & Welfare Trust Fund v. Chas. Pfizer & Company*, No. 4-71 Civ. 435; No. 4-71 Civ. 413 (D. Minn.) (Judge Lord)
16. *In re Fine Paper Antitrust Litigation*, MDL No. 325
17. *In re Armored Car Antitrust Litigation*, CA No. 78-139A, 472 F. Supp. 1357 (N.D. Ga. 1979)
18. *In re Ocean Shipping Antitrust Litigation*, MDL No. 395, 500 F. Supp. 1235 (3d Cir. 1984)
19. *In re Corn Derivatives Antitrust Litigation*, MDL No. 414, 500 F. Supp. 1235 (1980)
20. *In re Coconut Oil Antitrust Litigation*, MDL No. 474
21. *Garside v. Everest & Jennings Intern.*, 586 F. Supp. 389 (D.C. Cal. 1984)
22. *Lorries Travel & Tours, Inc. v. SFO Airporter Inc.*, 753 F.2d 790 (9th Cir. 1985)
23. *O'Neill Meat Co. v. Eli Lilly and Company*, No. 30 C 5093

24. *In re Records and Tapes Antitrust Litigation*, No.82 C 7589, 118 F.R.D. 92 (N.D. Ill 1987)
25. *In re Industrial Gas Antitrust Litigation*, No. 80 C 3479, 100 F.R.D. 280 (N.D. Ill 1987)
26. *Matter of Superior Beverages/Glass Container Consolidated Pretrial*, No. 83-C512, 137 F.R.D. 119 (N.D. Ill 1990)
27. *Big D. Building Corp. v. Gordon W. Wattles*, MDL No. 652
28. *In re Insurance Antitrust Litigation*, MDL No. 767
29. *In re Wirebound Boxes Antitrust Litigation*, MDL No. 793
30. *In re Domestic Air Transp. Antitrust Litigation*, MDL No. 861, 144 F.R.D. 421 (N.D. Ga. 1992)
31. *In re Infant Formula Antitrust Litigation*, MDL No. 878
32. *Finnegan v. Campeau Corp.*, 915 F.2d 824 (2d Cir. 1990)
33. *In re Carbon Dioxide Industry Antitrust Litigation*, MDL No. 940, 155 F.R.D. 209
34. *In re Medical X-Ray Film Antitrust Litigation*, No. CV 93-5904, FB
35. *In re Bulk Popcorn Antitrust Litigation*, 792 F. Supp. 650 (D. Minn. 1992)
36. *In re Baby Food Antitrust Litigation*, No. 92-5495, NHP
37. *In re Potash Antitrust Litigation*, MDL No. 981
38. *In re Brand Name Prescription Drugs Antitrust Litigation*, MDL No. 997, 94 C 897 (N.D. Ill.) (Judge Kocoras)
39. *In re Citric Acid Antitrust Litigation*, MDL No. 1092
40. *In re NASDAQ Market-Makers Antitrust Litigation*, MDL No. 1023
41. *In re Airline Ticket Commission Antitrust Litigation*, MDL No. 1058
42. *Pharmaceutical Cases I, II & III*, J.C.C.P. Nos. 2969, 2971 & 2972, San Francisco Superior Court
43. *In re Carpet Antitrust Litigation*, MDL No. 1075
44. *In re California Indirect-Purchaser Plastic Ware Antitrust Litigation*, Nos. 961814, 963201, 963590, San Francisco Superior Court
45. *Pastorelli Food Products, Inc. v. Pillsbury Co.*, No. 87C 20233
46. *Red Eagle Resources Corp. v. Baker Hughes Inc.*, No. 91-627 (NWB) (Drill Bits Litigation)
47. *Mark Notz v. Ticketmaster - Southern, and Related Cases*, No. 943327, San Francisco Superior Court
48. *Neve Brothers. v. Potash Corp.*, No. 959867, San Francisco Superior Court
49. *Food Additives (Citric Acid) Cases*, J.C.C.P. No. 3625, Master File No. 974-120
50. *Biljac v. Bank of America*

51. *Diane Barela v. Ralph's Grocery Co.*, No. BC070061, Los Angeles Superior Court
52. *Leslie K. Bruce v. Gerber Products Co.*, No. 948-857, San Francisco Superior Court
53. *In re California Indirect Purchaser Medical X-Ray Film Antitrust Litigation*, Master File No. 960886
54. *Lee Bright v. Kanzaki Specialty Papers, Inc.*, No. 963-598, San Francisco Superior Court
55. *Neve Brothers v. Potash Corporation of America*, No. 959-767, San Francisco Superior Court
56. *Gaehwiler v. Sunrise Carpet Industries Inc.*, No. 978345, San Francisco Superior Court
57. *In re Commercial Tissue Products Antitrust Litigation*, MDL No. 1189
58. *Sanitary Paper Cases I and II*, J.C.C.P. Nos. 4019 & 4027
59. *Gaehwiler v. Aladdin Mills, Inc.*, No. 300756, San Francisco Superior Court
60. *In re Flat Glass Antitrust Litigation*, MDL No. 1200
61. *Flat Glass Cases*, J.C.C.P. No. 4033
62. *Sorbate Prices Cases*, J.C.C.P. No. 4073
63. *In re Stock Options Trading Antitrust Litigation*, MDL No. 1283
64. *In re Vitamin Antitrust Litigation*, MDL No. 1285
65. *In re Sorbates Direct Purchaser Antitrust Litigation*, Master File No. C 98-4886 CAL
66. *Vitamin Cases*, J.C.C.P. No. 4076
67. *In re PRK/Lasik Consumer Litigation*, Master File No. CV 772894, Santa Clara Superior Court
68. *In re Nine West Shoes Antitrust Litigation*, Master File No. 99-CV-0245 (BDP)
69. *Food Additives (HFCS) Cases*, J.C.C.P. No. 3261
70. *In re Toys "R" Us Antitrust Litigation*, MDL No. 1211
71. *Cosmetics Cases*, J.C.C.P. No. 4056
72. *In re Methionine Antitrust Litigation*, MDL No. 1311
73. *Bromine Cases*, J.C.C.P. No. 4108
74. *Fu's Garden Restaurant v. Archer-Daniels-Midland*, No. 304471, San Francisco Superior Court
75. *Thomas & Thomas Rodmakers, Inc. v. Newport Adhesives and Composites, Inc.*, No. CV 99-07796 GHK
76. *In re Monosodium Glutamate Antitrust Litigation*, MDL No. 1328
77. *California Indirect Purchaser Auction House Cases*, Master Case No. 310313
78. *In re Cigarette Antitrust Litigation*, MDL No. 1342
79. *Cigarette Price Fixing Cases*, J.C.C.P. No. 4114

80. *Microsoft Cases*, J.C.C.P. No. 4106
81. *Compact Disk Cases*, J.C.C.P. No. 4123
82. *In re Compact Disc Minimum Advertised Price Antitrust Litigation*, MDL No. 1361
83. *In re Ciprofloxacin Hydrochloride Antitrust Litigation*, MDL No. 1383
84. *In re Buspirone Antitrust Litigation*, MDL No. 1413
85. *In re K-Durr Prescription Drug Antitrust Litigation*, MDL No. 1419
86. *Carbon Cases*, J.C.C.P. Nos. 4212, 4216 and 4222
87. *In re Polychloroprene Antitrust Cases*, J.C.C.P. No. 4376
88. *In re Urethane Cases*, J.C.C.P. No. 4367
89. *The Harman Press v. International Paper Co.*, Consolidated Cases, Master File No. CGC-04-432167
90. *In re Label Stock Cases*, J.C.C.P. No. 4314
91. *Richard Villa v. Crompton Corp.*, Consolidated Case No. CGC-03- 419116, San Francisco Superior Court
92. *Russell Reidel v. Norfalco LLC*, Consolidated Case No. CGC-03-418080, San Francisco Superior Court
93. *Smokeless Tobacco Cases I-IV*, J.C.C.P. Nos. 4250, 4258, 4259, & 4262, San Francisco Superior Court
94. *Natural Gas Antitrust Cases*, J.C.C.P. No. 4312
95. *In re Western States Wholesale Natural Gas Litigation*, MDL No. 1566
96. *In re Automotive Refinishing Paint Cases*, J.C.C.P. No. 4199
97. *In re Tableware Antitrust Litigation*, Master File No. C-04-3514 VRW, United States District Court, Northern District of California
98. *In re Credit/Debit Card Tying Cases*, J.C.C.P. No. 4335
99. *In re NBR Cases*, J.C.C.P. No. 4369
100. *Competition Collision Center, LLC v. Crompton Corp.*, No. CGC-04-431278, San Francisco Superior Court
101. *In re Urethane Chemicals Antitrust Litigation*, MDL No. 1616
102. *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648
103. *Carpinelli v. Boliden AB*, Master File No. CGC-04-435547, San Francisco Superior Court
104. *Automobile Antitrust Cases I and II*, J.C.C.P. Nos. 4298 and 4303
105. *In re Currency Conversion Fee Antitrust Litigation*, MDL No. 1409
106. *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, MDL No. 1486
107. *In re Publication Paper Antitrust Litigation*, MDL No. 1631

108. *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1663
109. *In re Hydrogen Peroxide Antitrust Litigation*, MDL No. 1682
110. *In re Intel Corp. Microprocessor Antitrust Litigation*, MDL No. 1717
111. *In re Air Cargo Shipping Services Antitrust Litigation*, MDL No. 1775
112. *In re International Air Transportation Surcharge Antitrust Litigation*, MDL No. 1793
113. *Carbon Black Cases*, J.C.C.P. No. 4323
114. *Madani v. Shell Oil Co.*, No. 07-CV-04296 MJJ
115. *In re Static Random Access Memory (SRAM) Antitrust Litigation*, MDL No. 1819
116. *In re Flash Memory Antitrust Litigation*, No. 4:07-CV-00086 SBA
117. *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827
118. *In re Korean Air Lines Co., Ltd., Antitrust Litigation*, MDL No. 1891
119. *In re Fasteners Antitrust Litigation*, MDL No. 1912
120. *In re Transpacific Passenger Air Transportation Antitrust Litigation*, MDL No. 1913
121. *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917
122. *In re Chocolate Confectionary Antitrust Litigation*, MDL No. 1935
123. *In re Flat Glass Antitrust Litigation (II)*, MDL No. 1942
124. *In re Municipal Derivatives Antitrust Litigation*, MDL No. 1950
125. *In re Aftermarket Filters Antitrust Litigation*, MDL No. 1957
126. *In re Puerto Rican Cabotage Antitrust Litigation*, MDL No. 1960
127. *In re Hawaiian and Guamanian Cabotage Antitrust Litigation*, MDL No. 1972
128. *In re California Title Insurance Antitrust Litigation*, No. 08-01341 JSW
129. *In re Optical Disk Drive (ODD) Antitrust Litigation*, MDL. No. 2143
130. *Kleen Products LLC v. Packaging Corporation of America*, No. 10-5711
131. *In re Automotive Parts Antitrust Litigation*, MDL No. 2311
132. *In re On-Line Travel Company (OTC)/Hotel Booking Antitrust Litigation*, MDL No. 2405
133. *In re Lithium Ion Batteries Antitrust Litigation*, MDL No. 2420
134. *In re Capacitors Antitrust Litigation*, Master File No. 14-cv-03264 JD, United States District Court, Northern District of California
135. *In re Resistors Antitrust Litigation*, Master File No. 15-cv-03820 RMW, United States District Court, Northern District of California

EXHIBIT 2

EXHIBIT 2*In re Lithium Ion Batteries Antitrust Litigation, Case No. 13-MD-2420 YGR*

SAVERI & SAVERI, INC.

Reported Hours and Lodestar on a Historical Basis

June 1, 2013 through August 31, 2017

NAME	STATUS	YEAR	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
ATTORNEYS					
Guido Saveri	P	2017	53.10	\$850.00	\$45,135.00
Guido Saveri	P	2016	165.80	\$850.00	\$140,930.00
Guido Saveri	P	2015	50.20	\$850.00	\$42,670.00
Guido Saveri	P	2014	61.30	\$850.00	\$52,105.00
Guido Saveri	P	2013	40.10	\$850.00	\$34,085.00
R. Alexander Saveri	P	2017	216.10	\$700.00	\$151,270.00
R. Alexander Saveri	P	2016	145.00	\$700.00	\$101,500.00
R. Alexander Saveri	P	2015	107.80	\$700.00	\$75,460.00
R. Alexander Saveri	P	2014	208.50	\$700.00	\$145,950.00
R. Alexander Saveri	P	2013	174.70	\$700.00	\$122,290.00
Cadio Zirpoli	P	2017	277.90	\$650.00	\$180,635.00
Cadio Zirpoli	P	2016	639.40	\$650.00	\$415,610.00
Cadio Zirpoli	P	2015	442.10	\$650.00	\$287,365.00
Cadio Zirpoli	P	2014	2.60	\$650.00	\$1,690.00
Cadio Zirpoli	P	2013	3.20	\$650.00	\$2,080.00
Geoffrey C. Rushing	OC	2017	200.50	\$650.00	\$130,325.00
Geoffrey C. Rushing	OC	2016	550.20	\$650.00	\$357,630.00
Geoffrey C. Rushing	OC	2015	177.80	\$650.00	\$115,570.00
Geoffrey C. Rushing	OC	2014	308.70	\$650.00	\$200,655.00
Geoffrey C. Rushing	OC	2013	0.70	\$650.00	\$455.00
Lisa Saveri Waste	P	2017	0.80	\$675.00	\$540.00
Lisa Saveri Waste	P	2016	5.10	\$675.00	\$3,442.50
Lisa Saveri Waste	OC	2015	63.00	\$650.00	\$40,950.00
Lisa Saveri Waste	OC	2014	10.70	\$650.00	\$6,955.00
Lisa Saveri Waste	OC	2013	3.80	\$650.00	\$2,470.00
David Hwu	A	2016	9.00	\$400.00	\$3,600.00
David Hwu	A	2015	5.60	\$400.00	\$2,240.00
David Hwu	A	2014	187.90	\$350.00	\$65,765.00

EXHIBIT 2***In re Lithium Ion Batteries Antitrust Litigation, Case No. 13-MD-2420 YGR***

SAVERI & SAVERI, INC.

Reported Hours and Lodestar on a Historical Basis

June 1, 2013 through August 31, 2017

NAME	STATUS	YEAR	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
David Hwu	A	2013	1.00	\$350.00	\$350.00
Carl Hammarskjold	A	2016	1,327.00	\$400.00	\$530,800.00
Carl Hammarskjold	A	2015	1,196.50	\$400.00	\$478,600.00
Carl Hammarskjold	A	2014	432.20	\$350.00	\$151,270.00
Carl Hammarskjold	A	2013	256.60	\$350.00	\$89,810.00
Travis Manfredi	A	2016	256.80	\$400.00	\$102,720.00
Travis Manfredi	A	2015	91.70	\$400.00	\$36,680.00
Travis Manfredi	A	2014	134.60	\$350.00	\$47,110.00
Matthew Heaphy	A	2017	319.90	\$450.00	\$143,955.00
Matthew Heaphy	A	2016	44.70	\$450.00	\$20,115.00
Matthew Heaphy	A	2015	1.00	\$450.00	\$450.00
Matthew Heaphy	A	2014	0.80	\$450.00	\$360.00
William Heye	A	2015	656.20	\$450.00	\$295,290.00
Sarah Van Culin	A	2017	1.50	\$400.00	\$600.00
Sarah Van Culin	A	2016	196.50	\$400.00	\$78,600.00
NON-ATTORNEYS					
David Dorr	PL	2015	4.50	\$175.00	\$787.50
David Dorr	PL	2014	2.80	\$175.00	\$490.00
Jae Hyun Lim	PL	2017	555.00	\$200.00	\$111,000.00
Jae Hyun Lim	PL	2016	1,433.50	\$200.00	\$286,700.00
Jae Hyun Lim	PL	2015	1,475.00	\$200.00	\$295,000.00
Jae Hyun Lim	PL	2014	599.00	\$200.00	\$119,800.00
Michaela Ogden	PL	2015	19.00	\$150.00	\$2,850.00
TOTAL:			13,117.40		\$5,522,710.00

(P) Partner

(A) Associate

(OC) Of Counsel

EXHIBIT 3

*In re Lithium Ion Batteries Antitrust Litigation, Case No. 13-MD-2420 YGR***EXHIBIT 3**

SAVERI & SAVERI, INC.

Expenses Incurred

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	\$1,927.00
Computer Research (Lexis, Westlaw, PACER, etc.)	\$2,685.90
Document Production	\$0.00
Experts / Consultants / Mediators	\$8,670.00
Messenger Delivery	\$0.00
Photocopies - In House	\$22,545.80
Photocopies - Outside	\$0.00
Postage	\$1,243.67
Service of Process	\$47.58
Overnight Delivery (Federal Express, etc.)	\$714.82
Telephone / Facsimile	\$1,236.72
Transcripts (Hearings, Depositions, etc.)	\$0.00
Travel (Airfare, Ground Travel)	\$3,065.90
Travel (Meals and Lodging)	\$3,514.26
TOTAL	\$45,651.65