

EXHIBIT CC

1 R. Alexander Saveri (Bar No. 173102)
Geoffrey C. Rushing (Bar No. 126910)

2 **SAVERI & SAVERI, INC.**

706 Sansome Street
3 San Francisco, CA 94111
Telephone: (415) 217-6810
4 Facsimile: (415) 217-6813

5 Bruce L. Simon (Bar No. 96241)
Benjamin E. Shiftan (Bar No. 265767)
6 **PEARSON, SIMON & WARSHAW, LLP**

44 Montgomery Street, Suite 2450
7 San Francisco, CA 94104
Telephone: (415) 433-9000
8 Facsimile: (415) 433-9008

9 Joseph J. Tabacco, Jr. (Bar No. 75484)
Todd A. Seaver (Bar No. 271067)
10 Jessica Moy (Bar No. 272941)

BERMAN TABACCO
11 44 Montgomery Street, Suite 650
San Francisco, CA 94104
12 Telephone: (415) 433-3200
Facsimile: (415) 433-6382

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 ELIZABETH C.
PRITZKER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS MOTION
FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF
EXPENSES, AND INCENTIVE AWARDS**

1 I, Elizabeth C. Pritzker, declare and state as follows:

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

7 2. My firm has served as counsel to Lloyd Ranola and as counsel for the Direct
8 Purchaser Class (“Class”) throughout the course of this litigation. The background and experience
9 of Pritzker Levine and its attorneys are summarized in the *curriculum vitae* attached hereto as
10 Exhibit 1.

11 3. Pritzker Levine has prosecuted this litigation solely on a contingent-fee basis, and
12 has been at risk that it would not receive any compensation for prosecuting claims against the
13 Defendants. While the firm devoted its time and resources to this matter, it has foregone other
14 legal work for which it could have been compensated.

15 4. During the pendency of the litigation, Pritzker Levine performed the following
16 work for the benefit of the Direct Purchaser Plaintiff class: At the direction of Interim Co-Lead
17 counsel, in the early phases of the case, Pritzker Levine attorneys performed factual and legal
18 research and assisted in drafting specified sections of the consolidated amended class complaints
19 (59.1 attorney hours). Also at Interim Co-Lead Counsel’s direction, attorneys at Pritzker Levine
20 assisted in drafting written discovery, and met and conferred with defense counsel to resolve
21 discovery disputes, identify and agree upon custodians likely to possess discoverable information,
22 and settle upon search terms (in English and in relevant foreign languages) that were used to
23 search defendants’ custodial files and electronically-stored information (283.1 attorney hours).
24 Pritzker Levine attorney, Shiho Yamamoto, is a native Japanese speaker. At Interim Co-Lead
25 Counsel’s direction, Ms. Yamamoto assisted Co-Lead Counsel in preparing for depositions of
26 Japanese-speaking witnesses (14.9 hours), and attended certain of these witnesses’ depositions to
27 ensure that the on-the-record Japanese to English (and English to Japanese) translations of their

1 necessitated travel;

2 c. billing for time connected with creating timekeeping records or for the time
3 of attorneys or staff expended in preparation of audited time records and expenses in support of
4 DPPs' application for an award of attorneys' fees and reimbursement of expenses.

5 7. The hourly rates for the attorneys and professional support staff in my firm
6 included in Exhibit 2 are the same as the regular rates charged for their services in non-contingent
7 matters and/or which have been accepted in other complex or class action litigation subject to the
8 hourly rate caps established by DPP Co-Lead Counsel, including:

9 a. the highest hourly rates for Attorneys at the highest Partner level is capped
10 at \$850 per hour;

11 b. the highest hourly rates for Attorneys at the Of-counsel/Special counsel
12 level for substantive work is capped at \$650 per hour, which excludes document review;

13 c. the highest hourly rates for Attorneys at the highest Associate level for
14 substantive work is capped at \$450 per hour, which excludes document review;

15 d. the highest hourly rates for Attorneys at the Associate level engaged in
16 English-language document review is capped at \$350 per hour; a cap of \$400 per hour is permitted
17 where the reviewer has special skill set, such as foreign language translation, and Lead Counsel
18 has approved that work performed; and

19 e. the highest hourly rates for Paralegals and investigators is capped at \$175
20 per hour.

21 8. My firm has expended a total of \$1,298.33 in unreimbursed costs and expenses in
22 connection with the prosecution of this litigation. These costs and expenses are broken down in
23 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs
24 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
25 action are reflected on the books and records of my firm. These books and records are prepared
26 from expense vouchers, check records and other source materials and represent an accurate
27 recordation of the expenses incurred.

1 9. The Pritzker Levine firm additionally paid a total of \$40,000.00 in assessments for
2 the joint prosecution of the litigation against the Defendants.

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

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed on this 29TH day of January, 2018 at Oakland, California.

10 

11 _____
12 Elizabeth C. Pritzker

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit 1

PRITZKER LEVINE

LLP

ATTORNEYS AT LAW

Pritzker Levine LLP is a boutique law firm focused on complex litigation nationwide. Our attorneys bring a unique blend of expertise, efficiency and sound judgment to the vigorous representation of clients in individual and class cases.

Pritzker Levine attorneys have successfully represented corporate clients, public entities, pension funds, small businesses, nonprofit groups, labor unions, whistleblowers and injured persons in cases involving antitrust violations, securities fraud and derivative claims, commercial disputes, consumer protection, financial wrongdoing, employment law and personal injuries, resulting in recoveries in excess of \$800 million.

Founding partners, Elizabeth Pritzker and Jonathan Levine, each have more than 25 years of experience in complex, multi-party and class litigation. The firm's highly accomplished attorneys have repeatedly been recognized as "*Super Lawyers*" or "*Rising Stars*" for their work serving their clients' interests in courtrooms, mediations and arbitrations across the country.

Pritzker Levine LLP maintains offices in California and New York, and represents clients in state and federal courts throughout the United States.

ANTITRUST

Pritzker Levine has served as a lead or co-lead counsel in antitrust litigation matters representing plaintiff classes alleging price fixing, monopolization and other anticompetitive conduct. We serve in a court-appointed leadership capacity in certain cases, and contribute as members of a court-approved executive committee or in a supportive role for the lead law firms in other cases.

While our leadership role varies, our contributions are always valuable. Our leadership experience includes the following antitrust matters:

- ***Il Fornaio (America) Corporation et al. v. Lazzari Fuel Company, LLC et al.***, Case No. 13-cv-05197-WHA (N.D. Cal.): As court-appointed Class Counsel, Pritzker Levine represented restaurants and a certified class of direct purchasers in a class action alleging a conspiracy among three primary U.S. distributors to fix prices and allocate the market and customers for mesquite lump charcoal in the United States. The case resulted in a class settlement that was approved by Judge William H. Alsup, with settlement payments to class members representing approximately 85% of actual antitrust damages.

- ***In re TFT-LCD (Flat Panel) Antitrust Litigation***, MDL No. 1827 (N.D. Cal.): As court appointed Liaison Counsel, Elizabeth Pritzker and the Pritzker Levine firm represented a certified class of direct purchaser plaintiffs in a multi-district antitrust class action alleging price-fixing by foreign and domestic manufacturers of Thin Film Transistor Liquid Crystal Display (TFT-LCD) products. The direct purchaser case resulted in class settlements of \$473 million, and an \$87 million jury verdict before trebling. *TFT-LCD* is considered to be one of the largest antitrust MDL actions in the United States. The case was litigated and tried to verdict before Judge Susan Illston.

- ***In Re National Collegiate Athletic Association Grant-In-Aid Cap Antitrust Litigation***, MDL No. 3541 (N.D. Cal.): As Additional Class Counsel, Pritzker Levine represents student-athlete plaintiffs Kendall Gregory-McGhee, Justine Hartman, Afure Jemerigbe and classes of current and former collegiate athletes of Division I football, men's basketball or women's basketball who received athletic grants-in-aid from colleges or universities that are members of the NCAA or one of its division conferences. This multi-district, nationwide class action alleges that the NCAA and its members illegally agreed or colluded to cap or depress the athletic

grant-in-aid program, causing serious financial hardship to hundreds of collegiate athletes, in violation of federal antitrust laws. Nationwide classes seeking injunctive relief have been certified, and \$208 million class damages settlement has received final court approval. Litigation for the injunctive relief classes is pending before Judge Claudia Wilken.

- ***In Re German Automotive Manufacturers Antitrust Litigation***, MDL No. 2796 (N.D. Cal.): Elizabeth Pritzker and Pritzker Levine LLP were appointed to the Plaintiffs' Steering Committee in this multi-district antitrust case alleging price-fixing of certain automotive technologies by major German automakers. This case is pending before Judge Charles Breyer and is in active litigation.

- ***In Re Packaged Seafood Products Antitrust Litigation***, MDL No. 2670 (S.D. Cal.): We serve as Discovery Co-Chair and as a member of the Indirect Purchaser Plaintiffs' Steering Committee, and represent a class of consumers in a multi-district antitrust case alleging price-fixing by the major producers of canned or packaged shelf-stable tuna products. This litigation is pending before Judge Janis L. Sammartino in the U.S. District Court for the Southern District of California and is in active litigation.

- ***In Re Transpacific Passenger Air Transportation Antitrust Litigation***, Case No. 07-cv-5634-CRB (N.D. Cal.): Elizabeth Pritzker, as a member of Plaintiffs' Executive Committee, represents a class of consumers and direct purchasers in a multi-district class action alleging fuel surcharge price-fixing by airlines in the transpacific passenger airline market. Plaintiffs have secured settlements with certain defendants totaling approximately \$70 million. The case is pending before Judge Charles Breyer and is in active litigation as against non-settling defendants.

- ***In Re Lithium Ion Rechargeable Batteries Antitrust Litigation***, MDL No. 2420 (N.D. Cal.): We serve as a member of the court-appointed Plaintiffs' Steering Committee, and represent direct purchasers in a multi-district antitrust class action alleging price-fixing by the major manufacturers of lithium ion rechargeable batteries. Direct purchaser plaintiffs have secured over \$70 million in settlements with defendants. A final settlement fairness hearing is set for May 8, 2018. The case is pending before Judge Yvonne Gonzalez Rogers.

- ***In Re: EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litigation***, MDL No. 2785 (D. Kansas): Elizabeth Pritzker, as Chair of the Plaintiffs' Steering Committee, represents a class of consumers in this multi-district antitrust class action alleging that Mylan engaged in anticompetitive actions and restrained competition in the pricing and sale of the EpiPen epinephrine injector. The case is pending before Judge Daniel D. Crabtree in the U.S. District Court of Kansas, and is in active litigation.

- ***In Re Domestic Drywall Antitrust Litigation***, MDL No. 2437 (E.D. Penn.): Pritzker Levine represents a number of 501(c)(3) nonprofit community development organizations and a proposed class of indirect purchasers in a nationwide class action alleging a conspiracy among gypsum board manufacturers and distributors to fix and raise the prices for gypsum board. This multi-district litigation has been consolidated before Judge Michael M. Baylson in the U.S. District Court for the Eastern District of Pennsylvania. We serve as a Liability Assessment Team Leader and on the Plaintiffs' Steering Committee.

- ***In Re Keurig Green Mountain Single-Serve Coffee Antitrust Litigation***, MDL No. 2542 (S.D.N.Y.): Pritzker Levine serves as a member of the Indirect Purchaser

Plaintiff Litigation Committee and represents consumers and a proposed class of indirect purchasers in a nationwide class action against Keurig Green Mountain, Inc., Green Mountain Roasters, Inc., and Keurig, Inc. (collectively “Keurig”) for monopolizing the U.S. market for the sale of single-serve portion packages of coffee, tea, cocoa and other beverages. This multi-district litigation has been consolidated before Judge Vincent S. Broderick in U.S. District Court for the Southern District of New York, and is in active litigation.

- ***In Re Disposable Contact Lens Antitrust Litigation***, MDL No. 2626 (M.D. Florida): In its role as a member of the Plaintiffs’ Steering Committee, Pritzker Levine represents plaintiffs and a proposed class of purchasers in a nationwide antitrust class action against contact lens manufacturers alleging that the manufacturers colluded to maintain the retail prices of contact lenses by imposing resale price maintenance restrictions on those products. This multi-district litigation has been consolidated before Judge Harvey E. Schlesinger in the U.S. District Court for the Middle District of Florida and is in active litigation.

- ***In Re Commodity Exchange, Inc. Gold Futures and Options Trading Litigation***, MDL No. 2548 (S.D.N.Y): Pritzker Levine represents clients and a proposed class of investors in multi-district litigation against the Bank of Nova Scotia, Barclay’s Bank PLC, Deutsche Bank, AG, Deutsche Bank Securities, Inc., HSBC Holdings PLC, HSBC USA, Inc., Societe Generale S.A., SG Americas Securities, LLC, the London Gold Market Fixing, Ltd., and others, alleging that defendants conspired, combined or agreed to fix the prices of physical gold and certain financial instruments directly linked to physical gold, in violation of the Commodities Exchange Act. The case is pending before Judge Valerie E. Caproni in the U.S. District Court for the Southern District of New York, and is in active litigation.

CONSUMER PROTECTION

Pritzker Levine and its attorneys have represented consumers injured by violations of a wide variety of deceptive practices and consumer protection laws. We have brought claims on behalf of all types of consumers, including credit card holders and purchasers of prescription drugs, motor vehicles, cosmetic products, consumer electronics, and time shares interests. We also prosecute privacy class actions for consumers who have been impacted by computer malware or data breaches. Examples of some of our consumer law case include:

- ***Corcoran v. CVS Pharmacy, Inc.***, Case No. 15-cv-02624-YGR (N.D. Cal): Pritzker Levine serves as Co-Lead Interim Class Counsel in a multi-state class action alleging a common fraudulent and deceptive pricing scheme by CVS to overcharge customers with third-party health care plans for generic prescription drugs purchased at CVS pharmacies. This case is pending appeal in the Ninth Circuit Court of Appeals.

- ***In Re Lenovo Adware Litigation***, MDL No. 2624 (N.D. Cal): Pritzker Levine serves as Interim Co-lead Class Counsel in multi-district class action litigation against the Chinese computer manufacturer, Lenovo and software provider Superfish for damages arising from the surreptitious installation of a Superfish spyware program by Lenovo on certain notebook computer models sold in the United States. The Superfish program allowed Superfish to monitor and alter computer users' internet search results, while at the same time making those computers vulnerable to security breaches and data theft. This case is pending before Judge Haywood Gilliam and is in active litigation.

- ***Patane et al. v. Nestle Waters North America Inc. / Brown et al v. Nestle Waters North America Inc.***, Lead Case No. 17-cv-01381-JAM (D. Conn.): Pritzker Levine, as a member of Plaintiffs’ Executive Committee, represents consumers in litigation against Nestle Waters North America Inc., alleging that Nestle deceptively labels, markets and sells its Poland Spring® line of bottled water products at 100% natural spring water. This case is pending before Judge Jeffrey A. Meyer in the U.S. District Court of Connecticut and is in active litigation.

- ***In Re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation***, MDL No. 2672 (N.D. Cal): As cooperating plaintiffs’ counsel, Pritzker Levine represented class representatives in multi-district litigation stemming from Volkswagen’s admission to federal regulators in September 2015 that the company used illegal software to cheat emissions tests on certain of its four-cylinder diesel cars, including the popular TDI models of the VW Jetta, Passat, Golf and Beetle, and the Audi A3 TDI diesel sedan. A set of class settlements for monetary compensation and auto repairs totaling more than \$10.3 billion has received final court approval.

- ***In Re Adobe Systems, Inc. Privacy Litigation***, 13–CV–05226–LHK (N.D. Cal.): Pritzker Levine, as a member of the Plaintiffs’ Executive Committee, represented plaintiffs and a proposed class of software purchasers and users in litigation against Adobe Systems, Inc., in an action arising from the 2013 security breach of Adobe’s servers in California. The breach resulted in the theft of Adobe source code for some of its most popular products and 40 GB of consumers’ personally identifiable information (“PII”), such as names, addresses, financial information, passwords and password hints. Judge Lucy Koh approved a class settlement of the litigation in September 2015.

- ***In Re GIB LLC Cases***, J.C.C.P. 4657 (Cal. Sup. Ct., County of Los Angeles): As Co-lead Class Counsel in this California State Court Judicial Council Coordinated Proceeding, Elizabeth Pritzker represented certified classes of salon owners, hair stylists and consumers who were exposed to off-gassing formaldehyde and other harsh chemicals from the Brazilian Blowout line of hair smoothing products and hair treatments that were deceptively advertised as “formaldehyde free” and as not containing harmful chemicals. In January 2014, the Los Angeles Superior Court granted final approval to a class settlement that provided substantial monetary benefits distributed to stylists and consumers, together with business practice changes with respect to the marketing, sale, handling, use, and disposition of Brazilian Blowout products.

- ***Benedict v. Diamond Resorts Corp., et al.***, Case No. 1:2012cv00183 (D. Hawaii): Pritzker Levine partners Elizabeth Pritzker and Jonathan Levine represented as Co-lead Counsel a class of timeshare owners challenging the imposition of an unauthorized Special Assessment fee for the repair of one of the timeshare resorts in Hawaii. Judge David A. Ezra granted final approval to a class action settlement of the matter in June 2013.

- ***Berrien v. New Raintree Resorts, International, LLC, et al.***, Case No. 4:10-cv-03125-CW (N.D. Cal): Pritzker Levine partners Jonathan Levine and Elizabeth Pritzker represented, as Class Counsel, timeshare vacation program members of Raintree Vacation Club and Club Regina who were charged a Special Assessment Fee. Following favorable decisions on defendants’ motions to dismiss and plaintiffs’ motion for class certification, the case resulted in a court-approved class settlement in March 2012.

- ***Wixon v. Wyndham Resort Development Corp., et al.***, Case No. C 07-2361- JSW (BZ) (N.D. Cal.): Pritzker Levine partners Jonathan Levine and Elizabeth Pritzker, as Lead Class and Derivative Counsel, represented time-share owners in a nationwide class action challenging pricing of WorldMark resorts and in derivative litigation against the WorldMark Board of Directors challenging corporate governance matters. After more than four years of litigation in federal and state court, the case was settled on favorable terms. Judge Jeffrey S. White finally approved the class settlement in August 2011.

- ***Gathron v. Chrysler Group, LLC***, 4:13-cv-05922-WHO (N.D. Cal.): As Co-Lead Counsel, Pritzker Levine partner Elizabeth Pritzker and special counsel Bethany Caracuzzo represented a proposed class of owners and lessees of 2011-2012 Dodge Chargers alleging that factory-installed headlight harnesses in these model year vehicles were defective and posed a serious safety hazard. The case was filed in the U.S. District Court for the Northern District of California, before Judge William H. Orrick. As a result of plaintiffs' efforts, Chrysler instituted a recall and repair program that included reimbursement benefits to vehicle lessees and owners.

- ***In Re Providian Credit Card Cases***, J.C.C.P. No. 4085 (Cal. Sup. Ct., County of San Francisco): Pritzker Levine partner Jonathan Levine represented as Co-lead Counsel a nationwide class of Providian credit card holders in this California State Court Judicial Council Consolidated Proceeding. The lawsuit alleged that Providian engaged in unlawful, unfair and fraudulent business practices by charging its customers unauthorized fees and charges. The case resulted in a \$105 million settlement, plus injunctive relief – one of the largest class action recoveries arising out of consumer credit card litigation.

- ***In Re GM Cases***, J.C.C.P. No. 4396 (Cal. Sup. Ct., County of Los Angeles): Pritzker Levine partner Elizabeth Pritzker, as Class Counsel, represented a certified class of owners and lessees of Chevrolet Silverado trucks whose vehicle engines had abnormal “knock, ping or slap” noise. The complaint alleged that GM maintained an Engine Knock Noise Adjustment Program that gave owners and lessees who complained free extended warranties and other benefits, but that GM failed to notify all affected owners and lessees of the Adjustment Program and its benefits, in violation of California’s Secret Warranty Law. This hotly contested litigation included two unsuccessful appeals by General Motors. The Los Angeles Superior Court finally approved a class settlement in 2009, which was ratified by the Bankruptcy Court for the Southern District of New York in 2011 after GM filed for bankruptcy.

- ***In Re SONY-BMG CD Technologies Litigation***, Case No. 1:05-cv-09575-NRB (S.D.N.Y): Pritzker Levine partner Elizabeth Pritzker represented as Co-lead Class Counsel a nationwide class of consumers alleging deceptive conduct in design, manufacture and sale of music CDs containing digital rights management (DRM) software containing security flaws and limiting use of the CDs. The case resulted in a settlement that provided for a nationwide recall of certain CDs, the dissemination of software utilities to remove the offending DRM software, cash and other compensation for consumers, and injunctive relief governing SONY BMG’s use of DRM.

- ***In Re iPod Cases***, J.C.C.P. No. 4355 (Cal. Sup. Ct., County of San Mateo): Pritzker Levine partner Elizabeth Pritzker, as Co-Lead Class Counsel, represented consumers in a nationwide class action lawsuit alleging that Apple’s advertising about the battery life of its First and Second Generation iPods was false and

misleading. This Judicial Council Coordinated Proceeding, which was filed in California State Court before the Honorable Beth Labson Freeman, resulted in a settlement conservatively valued at approximately \$15 million, which provided warranty extensions, battery replacements, cash payments, and store credits for those class members who experienced a battery failure.

SHAREHOLDER AND SECURITIES FRAUD LITIGATION

Pritzker Levine's attorneys are leading advocates for individual and institutional investors, and have a deserved reputation for success in representing shareholder interests in derivative or shareholder litigation. Our experience in matters involving shareholder disputes or securities fraud includes the following matters.

- ***Young v. Henderson***, Case No. RG-15-778891 (Cal. Sup. Ct., County of Alameda): We represent a shareholders in direct and derivative litigation filed in California State Court, alleging individual and derivative claims on behalf of six California limited liability companies, and asserting claims for breaches of fiduciary duty, conversion, breaches of contract, and related claims arising out of defendants' alleged misuse and misappropriation of foreign investment funds provided under the federal Immigration Investment, or EB-5, program. Pritzker Levine successfully moved for appointment of a receiver, and facilitated the sale of commercial real estate assets (including the landmark Oakland Tribune Tower), recouping approximately \$30 million for foreign investors. The litigation is still pending in the California State Court, but has spawned a parallel federal enforcement action by the Securities and Exchange Commission (SEC). The SEC action is currently pending in the federal District Court in San Francisco, California.

- ***Securities and Exchange Commission v. Bivona, et al.***, Case No. 3:16-cv-01386-EMC (N.D. Cal.): Pritzker Levine currently represents a majority investor group comprising approximately seventy percent of the membership interests in certain investment funds at issue as real parties in interest in a federal enforcement action by the SEC against a prior fund manager. The investors seek to assume management responsibilities of the funds, which are now the subject of a federal receivership, in order to protect their investments and further the investment purposes of the funds. This matter is currently pending before Judge Edward Chen, and is in active litigation.

- ***In Re Lehman Brothers Debt/Equity Securities Litigation***, Case No. 1:08-cv-05523-LAK:GWC (S.D.N.Y): Pritzker Levine partner Jonathan Levine represented as Class Counsel a certified class of retail investors in Lehman-issued structured products sold by UBS Financial Services, Inc. The plaintiffs alleged that UBS violated federal securities laws by selling the structured products pursuant to offering documents that misrepresented Lehman’s financial condition and failed to disclose that the “principal protection” feature of many of the notes depended upon Lehman’s solvency. The case resulted in a settlement that created a \$120 million fund to resolve the claims.

- ***In Re SLM Corporation Securities Litigation***, Case No. 08 Civ. 1029 (WHP) (S.D.N.Y): Pritzker Levine partner Jonathan Levine, as Lead Counsel, represented a certified nationwide class of investors of SLM Corporation (“Sallie Mae”) in litigation alleging that Sallie Mae, the leading provider of student loans in the U.S., misled the public about its financial performance in order to inflate the company’s stock price. The case resulted in a settlement that established a \$35 million fund to resolve investors’ claims.

- ***In Re Winstar Communications Securities Litigation***, Case No. 01 Civ. 3014 (GBD) (S.D.N.Y.): Pritzker Levine partner Jonathan Levine represented Allianz of America, Inc., Fireman’s Fund and other large private institutional investors in federal securities litigation against the senior executives of Winstar Communications Inc., Lucent Technologies Inc. and Grant Thornton LLP, arising out of plaintiffs’ investments in Winstar Communications, Inc. The case was resolved through several confidential settlements, the last one achieved on the eve of trial.

- ***In Re American Express Financial Advisors Securities Litigation***, Case No. 04 Civ. 1773 (DAB) (S.D.N.Y.): Pritzker Levine partner Jonathan Levine represented as Co-lead Counsel a nationwide class of individuals who bought financial plans and invested in mutual funds from American Express Financial Advisors. The case alleged that American Express steered its clients into underperforming “shelf space funds” to reap kickbacks and other financial benefits. The case resulted in a cash settlement of \$100 million.

- ***Rosen v. Macromedia, Inc.***, Case No. 988526 (Cal. Sup. Ct., County of San Francisco): Pritzker Levine partner Jonathan Levine, as Co-Lead Counsel, represented a certified nationwide class of investors of Macromedia in litigation alleging that the company and certain of its executives misled the public about its financial performance and products in order to inflate its stock price. The case resulted in a settlement that established a \$48 million fund to resolve investors’ claims.

- ***In Re Gupta Corporation Securities Litigation***, Case No. C 94-1517 FMS (N.D.Cal.): Pritzker Levine partner Jonathan Levine represented as Co-lead

Counsel a certified nationwide class of investors of Gupta Corporation in litigation alleging that Gupta and its senior-most executives misled the public about the company's financial performance in order to inflate the company's stock price. The case resulted in a \$15 million settlement fund to resolve investors' claims.

- ***Provenz v. Miller***, Case No. CV-92-20159-RMW (N.D.Cal): Pritzker Levine partner Jonathan Levine represented as Co-lead Counsel a certified nationwide class of investors of MIPS Technologies, Inc. in litigation alleging that MIPS and certain of its executives misled the public about its financial performance and products in order to inflate the company's stock price. The case resulted in a settlement that established a \$15 million fund to resolve investors' claims.

ATTORNEY PROFILES

Elizabeth C. Pritzker

Elizabeth Pritzker is a co-founding partner of Pritzker Levine LLP. She has 26 years of litigation experience representing clients in antitrust matters, consumer cases, business and employment disputes, and in First Amendment-related litigation.

Ms. Pritzker practices exclusively in the areas of litigation, trial and client counseling. She has successfully represented corporate clients, small businesses, public entities, nonprofit groups, labor unions, employees and injured persons in individual and class cases, and has counseled or successfully litigated on behalf of journalists and media clients.

Ms. Pritzker has served in a leadership capacity in numerous matters, including in several cases brought under federal and state antitrust and consumer protection statutes prosecuted in the federal district court in the Northern District of California and in the California state courts.

In the antitrust arena, Ms. Pritzker served as court-appointed Class Counsel in *Il Fornai (America) Corporation v. Lazzari Fuel Company, LLC*, N.D. Cal. Case No. 13-

cv-05197-WHA, an antitrust class action alleging customer allocation and bid-rigging among the major sellers of restaurant-grade mesquite charcoal. She also was appointed to serve as Liaison Counsel for Direct Purchaser Plaintiffs in *In re TFT-LCD (Flat Panel) Antitrust Litigation*, N.D. Cal. Case No. 07-md-01827-SI, a multi-district class action alleging price-fixing by manufacturers of LCD panels. She now serves as Additional Class Counsel in *In re National Collegiate Athletic Association Grant-In-Aid Cap Antitrust Litigation*, N.D. Cal. Case No. 14-md-02541-CW, where she represents current and former college athletes in multi-district litigation alleging that the NCAA and its members illegally agreed or colluded to cap or depress the athletic grant-in-aid program in violation of federal antitrust laws.

Ms. Pritzker currently serves on the Plaintiffs' Steering Committee in two Northern District of California antitrust class actions: *In re Lithium Ion Rechargeable Batteries Antitrust Litigation*, N.D. Cal. Case No. 13-md-02420-YGR, a multi-district class action alleging price fixing by foreign and domestic battery manufacturers; and *In re Transpacific Air Transportation Antitrust Litigation*, N.D. Cal. Case No. 07-cv-5634-CRB, a multi-district class action alleging price-fixing of airfares and surcharges by airlines in the transpacific airline market. Outside of the district, Ms. Pritzker currently has leadership positions in several antitrust matters, including: *In re Packaged Seafood Products Antitrust Litigation*, MDL No. 2670 (S.D. Cal.) (Discovery Chair/End-User Plaintiffs' Steering Committee); *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litigation*, MDL No. 2785 (D. Kansas) (Chair of Plaintiffs' Steering Committee); *In re Domestic Drywall Antitrust Litigation*, MDL No. 2437 (E.D. Penn.) (Liability Assessment Team Leader/Indirect Purchaser Plaintiffs' Steering Committee); and *In re Disposable Contact Lens Antitrust Litigation*, MDL No. 2626 (M.D. Florida) (Plaintiffs' Steering Committee).

In the consumer protection field, Ms. Pritzker and the firm currently serve as Co-lead Class Counsel in *Corcoran v. CVS Pharmacy, Inc.*, Case No. 15-cv-02624-YGR (N.D.

Cal), representing consumers in litigation against CVS for unfair and deceptive practices in the pricing and sale of generic drugs to insured customers, and in *In re Lenovo Adware Litigation*, MDL No. 2624 (N.D. Cal), representing consumers harmed by malicious software installed on certain Lenovo notebook computers. Previously, Ms. Pritzker served as Co-Lead Class Counsel in *In Re GIB LLC Cases*, JCCP No. 4657, where she represented a certified class of salon owners, hair stylists and consumers exposed to off-gassing formaldehyde and other harsh chemicals from the Brazilian Blowout line of hair smoothing products that were falsely advertised as “formaldehyde free” and as not containing harmful chemicals. She also served on the Plaintiffs’ Executive Committee in *In Re Adobe Systems, Inc. Privacy Litigation*, N.D. Cal. Case No. 5:13-cv-05226-LHK, a class action brought on behalf of users of Adobe software products whose personal private information or property were compromised as a result of alleged substandard security practices at Adobe that lead to a massive data and security breach in September 2013. Both matters resulted in court-approved settlements.

Ms. Pritzker has been consistently honored as a Northern California “*Super Lawyer*” (2010-2017), and has earned the distinction of being included among the “*Top 100 Super Lawyers*” as well as the “*Top 50 Women Super Lawyers*” in Northern California. In 2015, the American Antitrust Institute (AAI) selected Ms. Pritzker as a finalist for its annual “*Outstanding Antitrust Litigation Achievement in Private Law Practice*” Award.

Ms. Pritzker’s volunteer service includes work on behalf of the bench and bar. She sits on the Duke Law *Committee on Standards and Best Practices for Increasing Diversity in Mass Tort and Class Action Leadership*, and serves as a Lawyer Representative to the District Court for Northern District of California. She also sits on the Executive Committee of the Antitrust, Unfair Competition and Privacy Law Section of the State Bar of California, where she currently serves as Deputy Vice-Chair, *E-Briefs*. She has been honored by the Society of Professional Journalists–Northern California Chapter with the

prestigious “*James Madison Freedom of Information Award*” for her legal work on behalf of San Francisco Bay Area journalists and media.

Before founding Pritzker Levine, Ms. Pritzker was a partner at Girard Gibbs LLP in San Francisco, California. She was a principal attorney at Cotchett, Pitre & McCarthy LLP in Burlingame, California. She co-founded The First Amendment Project, a nonprofit public interest law firm representing journalists, media and others in First Amendment-related litigation, and served as its Chief Staff Attorney from 1992 to 1992.

Education

Ms. Pritzker received her Bachelor of Arts degree in Economics from McGill University in Montreal, Quebec, Canada. She obtained her Juris Doctor from the University of San Francisco School Of Law.

Bar Membership

Ms. Pritzker is admitted to practice in the State of California. She also is admitted to the United States Supreme Court; the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California; and the United States District Court for the District of Colorado.

Publications/Speaking Engagements

As part of the Executive Committee of the Antitrust, Unfair Competition and Privacy Law Section of the California State Bar, Ms. Pritzker has authored several articles about recent developments in the antitrust, privacy and consumer law fields for the Section’s monthly *E-Briefs*. She is a frequent commentator and lecturer on various topics, including antitrust law, class action procedure and practice, electronic discovery, use and enforcement of the Freedom of Information Act and individual state right-to-know laws, and civil litigation and trial practice.

Ms. Pritzker has served as a presenter on these and other issues on behalf of the American Bar Association (ABA), the American Association for Justice (AAJ), the San

Francisco Trial Lawyers Association (SFTLA), the State Bar of California, the California First Amendment Coalition (CFAC), and Consumer Attorneys of California (CAOC), among others. Ms. Pritzker's publications and speaking engagements include:

- Author, "*Making the Intangible Concrete: Litigating Intangible Harms in a Post-Spokeo World*," Competition: the Journal Antitrust, Unfair Competition and Privacy Law Section of the State Bar of California, Vol. 26, No. 1, Spring 2017.
- Speaker, "*Antitrust 101*," Annual Convention of Sections of the State Bar of California, August 2017.
- Speaker, "*Antitrust 101*," Annual Convention of the State Bar of California, September 2016.
- Webinar Speaker, "*Multistate Indirect Purchaser Class Actions: Using Consumer Protection Statutes to Hurdle the Illinois Brick Wall*," American Bar Association, December 2015.
- Webinar Moderator, "*Emerging Standards Under the FTAIA*," Antitrust, Unfair Competition and Privacy Law Section of the State Bar of California, February 2015.
- Speaker, "*The Lightbulb Conspiracy: Environmental Impacts of Planned Obsolescence*," Environmental Youth Forum 2015, February 2015.
- Lecturer, "*Post-Brinker Employment Class Action Seminar*," 46th Annual Consumer Attorneys of California Convention. November 2012.
- Presenter, "*Class Actions under Dukes*," Cambridge International Forums: Plaintiffs Class Action Forum, April 2012.
- Lecturer, *Summary Judgment Seminar*, San Francisco Trial Lawyers Association, February 2012.
- Moderator, *Judicial Perspectives on Class Actions*, Consumer Attorneys of California, March 2012.

Community/Pro Bono

Ms. Pritzker is passionate about environmentally-sensitive architecture and design. Her concern for the environment and the impact of consumer electronic waste on the health of the planet is depicted in the documentary film, *The LightBulb Conspiracy: The Untold Story of Planned Obsolescence*, by Cosima Dannoritzer.

Ms. Pritzker is a participating mentor in antitrust law for the American Bar Association (ABA) Antitrust Law Section and Young Lawyers Division, and a former board member of the Legal Aid Society of San Mateo County

Ms. Pritzker is a former board member of Bay Area Lawyers for Individual Freedom (BALIF). During her board term, she served as member of the Executive Committee and a Co-Chair of BALIF's Judiciary Committee. Previously, she chaired BALIF's Young Lawyers and Law Student Committee, where she oversaw and implemented BALIF's 'Connections' Mentoring Program.

Jonathan K. Levine

Jonathan Levine is a co-founding partner of Pritzker Levine LLP. Mr. Levine has more than 26 years of experience prosecuting complex securities fraud, business, antitrust and consumer class action litigation in state and federal courts. He has successfully represented high net worth investors, state public pension funds, multi-national corporations, small businesses, whistleblowers and consumers in individual, derivative and class action litigation.

Mr. Levine has served in a leadership role in numerous cases brought under federal and state securities, antitrust and consumer statutes. He also has represented whistleblowers before the U.S. Securities and Exchange Commission, the U.S. Commodity Futures Trading Commission and the U.S. Department of Justice. He served recently as Lead or Co-lead Counsel in *In re SLM Corp. Securities Litigation* (\$35 million settlement), *In re American Express Financial Advisors Securities Litigation* (\$100 million

settlement) and *In re Winstar Communications Securities Litigation* (confidential settlement on behalf of Allianz of America, Inc., Fireman's Fund and other large private institutional investors).

In the consumer protection field, Mr. Levine currently serves as Co-lead Counsel in *In re Lenovo Adware Litigation*, MDL 2624 (N.D. Cal.), where he represents more than 800,000 consumers in a nationwide multidistrict class action against Lenovo and Superfish for damages arising from the surreptitious installation of a Superfish spyware program by Lenovo on certain notebook computer models sold in the United States. He served as Co-lead Counsel in *In re Providian Credit Card Cases*, J.C.C.P. No. 4085 (Cal. Sup. Ct., County of San Francisco), which resulted in a \$105 million settlement, plus injunctive relief, one of the largest class action recoveries in the United States arising out of consumer credit card litigation. He also served as Lead or Co-lead Counsel in three class action cases challenging actions taken by timeshare developers to the detriment of the timeshare owners: *Wixon v. Wyndham Resort Development Corporation*, Case No. C 07-2361- JSW (BZ) (N.D. Cal.); *Berrien v. New Raintree Resorts*, Case No. 4:10-cv-03125-CW (N.D. Cal); and *Benedict v. Diamond Resorts Corporation*, Case No. 1:2012cv00183 (D. Hawaii).

Before collaborating with Elizabeth Pritzker to create Pritzker Levine LLP, Mr. Levine was a partner for more than a decade at Girard Gibbs LLP in San Francisco. He was a partner for nine years at Kaplan Fox & Kilsheimer LLP, a New York law firm.

Mr. Levine has been repeatedly recognized by his peers as a Northern California "Super Lawyer." He has served as an appointed member of the Committee on Federal Courts of the State Bar of California and as the past chair of the American Bar Association Litigation Section Subcommittee on Officers and Directors Liability. He currently serves as Chairman of the Executive Committee of the Business Section of the Alameda County Bar Association and as a member of Privacy Law Subcommittee of the State Bar of California Antitrust, Unfair Competition and Privacy Law Section.

Education

Mr. Levine graduated from Columbia University with a Bachelor of Arts degree in English. He obtained his Juris Doctor degree from Fordham University School of Law.

Bar Membership

Mr. Levine is admitted to practice in the States of California, New York and Connecticut. He is also admitted to practice before the U.S. Supreme Court, the U.S. Courts of Appeals for the Second, Fourth, Ninth and Eleventh Circuits, and the U.S. District Courts for the Southern and Eastern Districts of New York, the Northern, Central, Southern and Eastern Districts of California, the Northern District of Texas and the District of Colorado.

Publications/Speaking Engagements

Mr. Levine frequently writes and speaks on a host of legal issues. He recently served as a member of the National Association of Public Pension Attorneys' *Morrison* Working Group and was one of the drafters of *Living in a Post-Morrison World: How to Protect Your Assets Against Securities Fraud*, NAPPA (2012). He is the author of "E-Mail and Voice Mail Discovery Issues," Glasser LegalWorks (1998), and "Discovery Techniques in Commercial Litigation and Recent Developments In the Rules of Discovery," American Trial Lawyers Association (1991), and the co-author of "California Online Privacy Laws: The Battle for Personal Data," Competition: The Journal of the Antitrust, UCL and Privacy Section of the State Bar of California (Fall 2016), as well as "The Business Judgment Rule and Derivative Actions," Practising Law Institute (1989).

Mr. Levine has lectured on securities litigation under the Private Securities Litigation Reform Act of 1995, consumer fraud and predatory lending litigation, and computer discovery and electronic data retention risk control. He was the featured speaker addressing *Successful Direct Examination of Expert Witnesses* at the Bridgeport 2011 Conference on Working With and Deposing Experts (March 2011), and *Evaluating the*

Impact of the LIBOR Scandal at the West LegalEdCenter (August 2012).

Community/Pro Bono

Mr. Levine is a member of the Piedmont Civil Service Commission and the Piedmont Parks Commission. He also serves as a member of Piedmont Planning Commission and on its Environmental Task Force.

Bethany L. Caracuzzo

Bethany Caracuzzo serves as Special Counsel with Pritzker Levine LLP, where she focuses on litigation involving antitrust violations, defective products and services, employment law disputes and personal injury law. She has been repeatedly recognized by her peers as a Northern California “*Super Lawyer*,” an honor accorded to less than 5 percent of all licensed attorneys in California.

Ms. Caracuzzo is active in the firm’s prosecution of several antitrust class actions, including *In re Packaged Seafood Products Antitrust Litigation*, MDL No. 2670 (S.D. Cal.) (representing consumers in a multi-district class action alleging price-fixing by major U.S. producers of canned and packaged tuna), *In re Transpacific Air Transportation Antitrust Litigation*, N.D. Cal. Case No. 07-cv-5634-CRB (representing consumers in a multi-district class action alleging price-fixing by airlines in the transpacific passenger airline market), and *In re Domestic Drywall Antitrust Litigation*, E.D. Pa. Case No. 13-md-2437-MMB (representing nonprofit housing development entities and indirect purchasers in a multi-district class action alleging price fixing by U.S. drywall manufacturers). She was a key contributor to the firm’s settlement of consumer class action litigation involving the Brazilian Blowout line of hair smoothing products.

Prior to joining Pritzker Levine, Ms. Caracuzzo spent twelve years representing injured victims at two well-known San Francisco Bay Area law firms. She has litigated and obtained favorable settlements in personal injury cases involving medical malpractice,

dangerous drugs, defective products, dangerous property conditions, motor vehicle accidents and professional malpractice. She has served as a member of several trial teams in litigating cases to verdict, including case involving wrongful death, traumatic birth injuries and injuries from defective products.

Ms. Caracuzzo has represented plaintiffs in cutting edge medical malpractice matters involving In Vitro Fertilization (“IVF”) procedures. She also represented plaintiffs in cases addressing issues of clergy and teacher sexual abuse, and in civil rights cases.

In the employment arena, Ms. Caracuzzo has successfully represented individual victims of harassment and discrimination based upon their race, gender, national origin, disability and religious beliefs, as well as victims of sexual harassment and abuse. She also has worked to obtain a favorable results on behalf of dozens of victims who, as result of illegal Ponzi schemes, were defrauded of their life savings.

Ms. Caracuzzo began her legal career in the Office of the District Attorney for San Diego County, where she focused on child support enforcement, paternity disputes and custodial/family law matters. She later worked as a Research Attorney for the Superior Court of Alameda County.

Education

Ms. Caracuzzo graduated *cum laude* from Boston College, earning a Bachelor of Arts degree in International Relations with a focus on conflict resolution. She obtained her Juris Doctor degree in just two years from California Western School of Law in San Diego, California. While at California Western, she received the Wiley W. Manual Award for Pro Bono Excellence for her work with the San Diego AIDS Foundation Project.

Bar Memberships

Ms. Caracuzzo is admitted to practice in the State of California and before the U.S. Court of Appeals for the Ninth Circuit and the U.S. District Courts for the Northern, Central, Southern, and Eastern Districts of California.

Speaking Engagements

Ms. Caracuzzo currently serves as the Secretary to the Women's Caucus of Consumer Attorneys of California (CAOC), a group dedicated to the advancement of women lawyers as well as committed to supporting and furthering legislation that impacts the lives of Californians. She is an active member of several professional associations, including San Francisco Trial Lawyers Association (SFTLA), California Employment Lawyers Association (CELA), the American Association for Justice (AAJ), the Alameda County Bar Association (ACBA), and the Bar Association of San Francisco (BASF).

In February 2013, Ms. Caracuzzo was a featured SFTLA lecturer in a continuing legal education seminar entitled "Opposing Motions for Summary Judgment."

John A. Kehoe

John Kehoe is of counsel to Pritzker Levine LLP. Mr. Kehoe is based in the firm's New York office, where he works with clients to elicit changes to enhance corporate governance, promote management responsibility, protect stockholder rights, and recover financial losses as a result of wrongful misconduct. He currently is assisting the firm in the prosecution of complex litigation matters, including *In re Lenovo Adware Litigation*, MDL 2624 (N.D. Cal.) (representing consumers in a multi-district class action Lenovo and Superfish for damages arising from the surreptitious installation of a Superfish spyware program by Lenovo on certain notebook computers), and *In re Disposable Contact Lens Antitrust Litigation*, MDL 2626 (M.D. Fla.) (representing plaintiffs in a nationwide class action against contact lens manufacturers alleging that the manufacturers colluded to maintain the retail prices of contact lenses).

During more than 18 years in practice, Mr. Kehoe prosecuted precedent-setting securities and financial fraud cases in federal and state courts on behalf of institutional and individual clients, including serving as lead counsel in *In re Bank of America Corporation*

Securities Litigation (\$2.4 billion settlement); *In re Wachovia Preferred Securities and Bond/Notes Litigation* (\$627 million settlement); *In re Initial Public Offering Securities Litigation* (\$586 million settlement resolving 309 consolidated actions); *In re Lehman Brothers Securities and ERISA Litigation* (\$516 million settlement); and *In re Marvell Technology Group Ltd. Securities Litigation* (\$72 million settlement). Mr. Kehoe has represented clients before the Second and Eleventh Circuit Courts of Appeals, and is active in merger and acquisition litigation before the Delaware Court of Chancery, including serving on the Executive Committee in *In re Safeway Stockholders Litigation*, where value of the transaction to stockholders was increased by more than \$80 million.

Mr. Kehoe is the founding partner of The Kehoe Law Firm, was formerly a partner with Kessler Topaz Meltzer & Check, LLP for six years, a partner with Girard Gibbs LLP for two years, and was previously associated with Clifford Chance LLP, a London-based global law firm, where he defended Fortune 500 companies in complex securities and antitrust civil litigation and against enforcement actions brought by the Department of Justice, the Securities and Exchange Commission, and the Federal Trade Commission.

Mr. Kehoe is a program faculty member with the National Institute of Trial Advocacy, and was previously an adjunct faculty member with the Trial Advocacy Training Program at the Louisiana State University School of Law. Prior to attending law school, Mr. Kehoe served as a law enforcement officer in the State of Vermont for eight years, where he was a member of the tactical Special Reaction Team and member of the Major Accident Investigation Team.

Education

Mr. Kehoe received his Juris Doctorate, *magna cum laude*, from Syracuse University College of Law, where he was associate editor of the Syracuse Law Review, associate member of the Syracuse Moot Court Board and an alternate member on the National Appellate Team. He also received a Masters of Public Administration from the University of Vermont, and Bachelor of Arts from DePaul University.

Bar Memberships

Mr. Kehoe is a member of the New York City and New York State Bar Associations, and he is admitted to practice in New York and Pennsylvania, and is a member in good standing with the U.S. District Court for the Southern District of New York and the U.S. Court of Appeals for the Second Circuit.

Speaking Engagements

Mr. Kehoe is a frequent speaker at conferences focused on shareholder rights and corporate governance issues, including the 2013 National Conference on Public Employee Retirement Systems (Rancho Mirage, CA); 2013 Investment Education Symposium (New Orleans, LA); 2013 Public Funds East Conference (Newport, RI); 2012 Rights and Responsibilities for Institutional Investors (Amsterdam, Netherlands); 2011 European Investment Roundtable (Stockholm, Sweden); 2011 Public Funds Symposium (Washington, D.C.); 2011 National Conference on Public Employee Retirement Systems (Miami Beach, FL); 2010 ESG, USA Global Trends and U.S. Sustainable Investing (NY, NY); 2010 ICGN Annual Conference: “*The Changing Global Balances*” (Toronto, Canada); 2010 Public Funds West Summit (Scottsdale, AZ); 2009 ICGN Annual Conference: “*The Route Map to Reform and Recovery*” (Sydney, Australia); and the 2007 European Pensions Symposium (Marbella, Spain).

Heather P. Haggarty

Heather P. Haggarty is an associate attorney with Pritzker Levine LLP. Her practice focuses on complex commercial litigation. She currently is assisting in the firm’s prosecution of several antitrust matters, including *In re National Collegiate Athletic Association Grant-In-Aid Cap Antitrust Litigation*, N.D. Cal. Case No. 14-md-02541-CW (representing college athletes in multi-district litigation alleging that the NCAA and its members combined or agreed to cap or depress the athletic grant-in-aid program in

violation of federal antitrust laws), and *In re Lithium Ion Rechargeable Batteries Antitrust Litigation*, N.D. Cal. Case No. 13-md-02420-YGR (representing consumers and direct purchasers in a multi-district class action alleging price fixing by lithium ion battery manufacturers).

Over her legal career, Ms. Haggarty has litigated a wide range of commercial cases involving securities fraud, trademark, copyright and patent infringement and white collar criminal defense. She also has extensive experience in internal corporate investigations. Before joining Pritzker Levine, Ms. Haggarty worked for several years as a litigation associate at Bullivant Houser Bailey PC in San Francisco. Prior to that, she worked for three years as a litigation associate in the trial department at Dorsey & Whitney, LLP in New York.

Education

Ms. Haggarty graduated from Scripps College, earning a Bachelor of Arts degree in Political Psychology. She obtained her Juris Doctor degree from Fordham University School of Law.

Bar Memberships

Ms. Haggarty is admitted to practice in the States of California and New York. She is also admitted to practice before the United States District Court for the Southern District of New York.

Publications/Speaking Engagements

Ms. Haggarty is the author or co-author of several articles, including: “*California Online Privacy Laws: The Battle for Personal Data*,” published in Competition: The Journal of the Antitrust, UCL and Privacy Section of the State Bar of California (Fall 2016); “*Rule 23(b)(3)(F): Closing the Doors of the Courthouse*,” published in the Common Good, Fordham Law School (1999); “*Court Permits Differential Treatment Based on Native American Sovereignty*,” published in the New York Law Journal (1998); “*Defamation, Internet Providers, and Publisher Liability: A Square Peg in a Round Hole?*,” published

in the NY State Bar Association Entertainment, Arts & Sports Law Journal (1998); and “*The Media and the Attorneys’ Absolute Privilege to Defame: Undermining or Preserving the Integrity of the Judicial Process?*,” published in the NY State Bar Association Entertainment, Arts & Sports Law Journal (1997).

Community/Pro Bono

Ms. Haggarty has served as a volunteer attorney with the Lawyers Committee for Civil Rights Under Law and with Public Justice in Oakland, California. She has also done volunteer work for Public Advocates in San Francisco.

Anne Maness Whitney

Anne Maness Whitney is an associate attorney with Pritzker Levine LLP. Ms. Whitney assists the firm in the prosecution of multi-district class actions involving antitrust violations and privacy law. She is currently assisting with the firm’s prosecution of *In re National Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litigation*, MDL No. 2541 (N.D. Cal.) (representing current and former student-athletes in a class action alleging artificial caps on Grant-in-Aid scholarships); *In re Lenovo Adware Litigation*, MDL No. (N.D. Cal.) (representing consumers in a class action alleging secret installation of spyware); and *In re Disposable Contact Lens Antitrust Litigation*, MDL No. 2626 (M.D. Florida) (representing consumers in a nationwide antitrust class action against contact lens manufacturers alleging that the manufacturers colluded to maintain the retail prices of contact lenses).

Ms. Whitney holds a certification from the International Association of Privacy Professionals in the area of U.S. private sector (C.I.P.P./US). Before moving to California, she worked as a staff attorney at Legal Aid of North Carolina, focusing on foreclosure defense and landlord/tenant law.

Education

Ms. Whitney graduated from Duke University, earning a Bachelor of Arts degree in history with a political science minor. She obtained her law degree from George Mason University School of Law.

Bar Memberships

Ms. Whitney is admitted to practice in the states of California and North Carolina. She is also admitted to practice before the United States District Court for the Northern District of California.

Community/Pro Bono

Ms. Whitney has served as a volunteer attorney with Legal Aid of North Carolina in Raleigh, North Carolina and continues to do so through advice-only telephone referrals.

Exhibit 2

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

Pritzker Levine

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					
Elizabeth C. Pritzker	P	2017	0.40	\$695.00	\$278.00
Elizabeth C. Pritzker	P	2016	5.00	\$675.00	\$3,375.00
Elizabeth C. Pritzker	P	2015	67.95	\$650.00	\$44,167.50
Elizabeth C. Pritzker	P	2014	24.80	\$650.00	\$16,120.00
Elizabeth C. Pritzker	P	2013	62.85	\$645.00	\$40,538.25
Jonathan K. Levine	P	2015	2.10	\$650.00	\$1,365.00
Bethany L. Caracuzzo	OC	2017	0.50	\$625.00	\$312.50
Bethany L. Caracuzzo	OC	2016	0.00	\$600.00	\$0.00
Bethany L. Caracuzzo	OC	2015	39.15	\$600.00	\$23,490.00
Bethany L. Caracuzzo	OC	2014	25.70	\$595.00	\$15,291.50
Bethany L. Caracuzzo	OC	2013	2.60	\$595.00	\$1,547.00
Heather Haggarty	A	2015 (Doc Rev)	53.70	\$350.00	\$18,795.00
Shiho Yamamoto	A	2016	38.10	\$450.00	\$17,145.00
Shiho Yamamoto	A	2016 (Japanese Doc Rev)	784.50	\$400.00	\$313,800.00
Shiho Yamamoto	A	2015	181.60	\$425.00	\$77,180.00
Shiho Yamamoto	A	2015 (Japanese Doc Rev)	566.65	\$400.00	\$226,660.00
Shiho Yamamoto	A	2014	23.70	\$395.00	\$9,361.50
Shiho Yamamoto	A	2013	5.90	\$390.00	\$2,301.00
Jonathan T. Taylor	A	2014 (Doc Rev)	190.10	\$300.00	\$57,030.00
TOTAL:			2,075.30		\$868,757.25

(P) Partner

(A) Associate

(INV) Investigator

(PL) Paralegal

Exhibit 3

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

Pritzker Levine

Expenses Incurred

June 1, 2013 through August 31, 2017

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	\$0.00
Computer Research (Lexis, Westlaw, PACER, etc.)	\$421.61
Document Production	
Experts / Consultants	
Messenger Delivery	
Photocopies - In House	
Photocopies - Outside	
Postage	\$11.37
Service of Process	
Overnight Delivery (Federal Express, etc.)	
Telephone / Facsimile	
Transcripts (Hearings, Depositions, etc.)	
Travel (Airfare, Ground Travel)	\$703.90
Travel (Meals and Lodging)	\$161.45
TOTAL	\$1,298.33