

EXHIBIT II

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

24
25 UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA
27 OAKLAND DIVISION

28 IN RE: LITHIUM ION BATTERIES
ANTITRUST LITIGATION

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

29 This Document Relates to:
30 ALL DIRECT PURCHASER CLASS
31 ACTIONS

**DECLARATION OF JASON S. HARTLEY
IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS MOTION FOR AN AWARD
OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
INCENTIVE AWARDS**

1 I, Jason S. Hartley, declare and state as follows:

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

7 2. My firm has served as counsel to Plaintiffs Michael Barbat and David Brownlee as
8 counsel for the Direct Purchaser Class (“Class”) throughout the course of this litigation. The
9 background and experience of Stueve Siegel Hanson LLP and its attorneys are summarized in the
10 *curriculum vitae* attached hereto as Exhibit 1.

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

15 4. During the pendency of the litigation, Stueve Siegel Hanson LLP performed the
16 following work: researched the relevant industry and antitrust allegations, prepared and filed class
17 complaints, vetted named plaintiffs for the amended consolidated complaint, and reviewed
18 defendants’ foreign language documents.

19 5. Attached hereto as Exhibit 2 is my firm’s total hours and lodestar, computed at
20 historical rates, for the period of June 1, 2013 through August 31, 2017. This period reflects the
21 time spent after the appointment of Interim Co-Lead Counsel and Liaison Counsel for Direct
22 Purchased Plaintiffs (“DPP”) in this litigation. The total number of hours spent by Stueve Siegel
23 Hanson LLP during this period of time was 254.60, with a corresponding lodestar of \$113,921.00.
24 My firm’s lodestar figures are based on the firm’s historical billing rates which do not include
25 charges for expense items. Expense items are billed separately and such charges are not
26 duplicated in my firm’s billing rates. This summary was prepared from contemporaneous, daily
27 time records regularly prepared and maintained by my firm. The lodestar amount reflected in

28

1 Exhibit 2 is for work assigned by DPP Co-Lead Counsel, and was performed by professionals at
2 my law firm for the benefit of the Class.

3 6. Stueve Siegel Hanson LLP has reviewed the time and expense records that form the
4 basis of this declaration to correct any billing errors. In addition, my firm has removed all time
5 entries and expenses related to the following:

6 a. travel time unless the attorney or professional was actively engaged in
7 preparation or work in connection with a particular assignment made by Co-Lead Counsel which
8 necessitated travel;

9 b. billing for time connected with creating timekeeping records or for the time
10 of attorneys or staff expended in preparation of audited time records and expenses in support of
11 DPPs' application for an award of attorneys' fees and reimbursement of expenses.

12 7. The hours my firm billed to the litigation for reading or reviewing pleadings, ECF
13 notices or other papers was, in every instance, necessary to keep my clients Michael Barbat and
14 David Brownlee informed of events in the litigation.

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

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

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

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

25 d. the highest hourly rates for Attorneys at the Associate level engaged in
26
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1 English-language document review is capped at \$350 per hour; a cap of \$400 per hour is permitted
2 where the reviewer has special skill set, such as foreign language translation, and Lead Counsel
3 has approved that work performed; and

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

6 8. My firm has expended a total of \$4,822.17 in unreimbursed costs and expenses in
7 connection with the prosecution of this litigation. These costs and expenses are broken down in
8 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs
9 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
10 action are reflected on the books and records of my firm. These books and records are prepared
11 from expense vouchers, check records and other source materials and represent an accurate
12 recordation of the expenses incurred.

13 9. Stueve Siegel Hanson LLP paid a total of \$15,000 in assessments for the joint
14 prosecution of the litigation against the Defendants.

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

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed on this 31 day of Jan, 2018 at San Diego,
22 California.

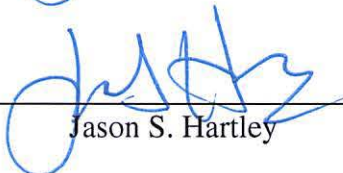
23
24 
25
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27
28
Jason S. Hartley

Exhibit 1

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REPRESENTING CORPORATE AND INDIVIDUAL
PLAINTIFFS NATIONWIDE IN COMPLEX LITIGATION

Kansas City

460 Nichols Road, Suite 200
Kansas City, Missouri 64112

San Diego

550 West C Street, Suite 1750
San Diego, California 92101

www.stuevesiegel.com

FIRM OVERVIEW

SSH is an AV rated Missouri-based law firm with 26 lawyers in offices in Kansas City and San Diego. All of the firm's lawyers are dedicated to the practice of litigation full time, making the firm one of the largest litigation-only firms based in the Midwest. Norman Siegel and Patrick Stueve left partnerships at large defense firms in 2001 to start SSH for the purpose of pursuing complex cases primarily representing plaintiffs on a contingency basis. Since then, the firm has attracted a stellar roster of trial lawyers that have served at high levels of government and public service to represent consumers nationwide like those impacted by this litigation. Our partners include Steve Six, the former Attorney General for the State of Kansas, and a former Kansas district court judge. The firm intends to call upon a deep bench of experienced partners and associates, many of whom are former state or federal law clerks including four former United States Circuit Court of Appeals clerks, five former United States District Court clerks, two former state Supreme Court clerks, and two former state court of appeals clerks. The result of cultivating attorneys with diverse, quality experience is a consistently top-notch work product, respect from our opponents, and accolades from our peers. More information regarding the firm, the scope of its practice, and its honors is available at www.stuevesiegel.com.

Since opening our doors in 2001, SSH has obtained substantial results in a wide range of complex commercial, class, and collective actions while serving as lead or co-lead counsel.

CLASS AND COLLECTIVE ACTIONS

- Obtaining a jury trial verdict for \$218 million on behalf of class of Kansas farmers against biotech giant Syngenta related to the sale genetically modified corn seed;
- Obtaining additional death benefits valued at \$2.25 billion, with a market value of approximately \$171.8 million, on behalf of 77,000 policy holders against Lincoln National Life Insurance Company;
- Obtaining up to \$220 million in damages for all Missouri residents who purchased the prescription pain reliever Vioxx before it was removed from the market;
- Obtaining complete class relief settlement against Volkswagen concerning defective window regulators. Volkswagen agreed to reimburse all expenses incurred by VW owners plus \$75 for each documented incident;
- Obtaining over \$75 million in relief for purchasers of Hyundai vehicles for Hyundai's overstatement of horsepower in vehicles;
- Obtaining a \$73 million settlement as one of the MDL lead counsel appointed in *In re Bank of America Wage and Hour Employment Practice Litigation*;
- Obtaining \$53.5 million in settlements between a class of direct purchasers of automotive lighting products and several manufacturers accused of participating in a wide-ranging price fixing scheme;

- Obtaining a \$44.5 million settlement to resolve a class action accusing U.S. Bank of facilitating the theft of customer funds at now-bankrupt futures merchant Peregrine Financial Group Inc.;
- Obtaining over \$44 million in restitution and \$7.9 million in cash for dentists against Align Technology, Inc. in a nationwide deceptive trade practices case;
- Obtaining \$39.5 million in settlements from three refiners on behalf of adjacent home owners who were living above a large plume of gasoline leaked from the refineries and connecting pipelines;
- Obtaining \$35 million in relief for consumer fraud and antitrust claims brought on behalf of retail customers of pre-filled propane tanks;
- Obtaining \$33 million in relief for owners of Mitsubishi and Chrysler owners related to defective wheel rims;
- Obtaining \$33 million in nationwide class action alleging price fixing for certain polyurethanes in Urethanes antitrust case;
- Obtaining \$29.5 million in settlements for overdraft fees charged to customers from UMB Bank, Bank of Oklahoma and Intrust Bank;
- Obtaining \$25.4 million for purchasers of H&R Block's Express IRA product related to allegedly false representations made during the sales presentation;
- Obtaining a \$7.7 million nationwide settlement after the Court certified a nationwide class of cable & wireless customers who had been overcharged PICC fees; and
- Obtaining \$7.2 million in relief for Sprint customers affected by Sprint's practice of improperly charging "casual caller" rates.



A TRIAL FIRM

Stueve Siegel Hanson prides itself in obtaining substantial results at trial. Some of our recent courtroom victories include:

- A \$218 million jury verdict on behalf of class of Kansas farmers against biotech giant Syngenta related to the sale genetically modified corn seed;
- An arbitration award in a \$70 million bet the company Fraud and Deceptive Trade Practices Act case for a family-owned franchiser headquartered in Phoenix, Arizona;
- A \$24 million jury verdict on behalf of independent contractor agents against State Farm in a breach of contract and tortious interference case;
- A \$7.1 million jury verdict against one of the country's largest securities brokers, A.G. Edwards & Sons, in a breach of contract and fraud case;
- A \$3.5 million jury verdict and attorneys' fee award against the world's largest manufacturer of recreational boats in a fraud and breach of contract case;
- A \$1.6 million jury verdict against a major paint and coating supplier in a negligent misrepresentation case;
- A \$1.5 million award after trial of a fraudulent transfer claim on behalf of a bankruptcy trustee;
- A jury verdict in favor of workers at a Tyson Foods meatpacking facility in Holcomb, Kansas for violation of federal and state labor and wage laws;
- Multiple arbitration awards in favor of thousands of employees in arbitrations of wage and hour claims;
- A \$660,000 verdict in a fraud and breach of contract claim and a verdict in favor of our client in a breach of fiduciary duty counterclaim;
- A defense verdict for a client defending a multi-million dollar tort claim; and
- A defense verdict in a high-profile white collar criminal price fixing case following an eight week trial.

Stueve Siegel Hanson is proud of our long history of delivering results to our clients. We are proud of our successes and our focus on results. Our mission is the same whether our clients are a class of employees or consumers, or Fortune 100 companies. More information about our commitment to results can be found on our website: www.stuevesiegel.com.

Our Lawyers



Patrick J. Stueve has been recognized by his peers as one of the top commercial trial lawyers in the country for his efforts over the past 25 years. He has been named to *The Best Lawyers® in America* for Bet the Company, Antitrust and Commercial Litigation, Top 100 Super Lawyers in Kansas and Missouri, “Local Litigation Star” by *Benchmark Plaintiffs*, and “Best of the Bar” by the *Kansas City Business Journal*.

Patrick has prosecuted claims in federal and state courts nationwide in the areas of antitrust, intellectual property, securities fraud and other commercial torts against some of the largest businesses in the world including Formula 1 Racing, ITW, Citigroup, United Health Care, and AIG. Patrick has also successfully prosecuted several national and state wide class actions against global giants including Volkswagen, Merck & Co. and. His national practice includes privately-held companies like Heartland Spine & Specialty Hospital and Associated Wholesale Grocers as well as publicly traded Fortune 500 companies like Seaboard Corporation and Kawasaki. In addition to his law practice, Patrick serves on the Board of YMCA of the Rockies (Estes Park, CO), and Alfred Friendly Press Partners (Washington D.C.).

* * *



Norman E. Siegel is a founding member of the firm. Over the last 20 years, Norm has gained a reputation as a stand-out trial lawyer both locally and nationally. He has successfully tried to verdict a wide range of cases including obtaining several multi-million dollar jury verdicts. Norm has also been recognized for obtaining some of the largest settlements in the country, successfully securing hundreds of millions of dollars for his clients over the course of his career.

Norm was born in Baltimore, Maryland. He received a degree in political science from Tufts University, and his J.D. from Washington University in St. Louis. At Washington University he served as Articles Editor of the Washington University Journal of Urban Contemporary Law. Norm has been named to *The Best Lawyers® in America*, has been elected a Missouri Super Lawyer, and has been named “Best of the Bar” and “Kansas City Newsmaker” by the *Kansas City Business Journal*. Norm was also named to Lawdragon Magazine’s 500 Leading Plaintiffs’ Lawyers in America, and named a “Local Litigation Star” by *Benchmark Plaintiffs*. Norm is rated AV – the highest designation a lawyer can achieve from publisher Martindale-Hubbell. Prior to starting Stueve Siegel Hanson in 2001, Norm served as an Assistant Attorney General and as a partner at what is now Dentons.

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George A. Hanson graduated with High Honors from Oberlin College with a B.A. in History. In 1992, George obtained his J.D., cum laude, from the University of Minnesota Law School. George is one of the region's leading commercial litigators and trial lawyers. George has been named "Best of the Bar" by the *Kansas City Business Journal* for ten years and has also been elected a Missouri Super Lawyer every year since 2006. George has been named a "Local Litigation Star" by *Benchmark Plaintiffs* and was recently selected by his peers for inclusion in *The Best Lawyers® in America*. Additionally, he was named the *Best Lawyers' 2014 Kansas City, MO – Class Actions - Plaintiffs* "Lawyer of the Year." George is rated AV - the highest designation a lawyer can achieve from publisher Martindale Hubbell.

George is an experienced commercial litigator and trial attorney. George has successfully tried many cases to judges and juries in both state and federal court, and has extensive experience representing clients in arbitration. In addition to trial work, George has developed an active appellate practice and has successfully argued numerous cases before state appellate courts in Missouri, Kansas and Illinois, and federal appellate courts in the Eighth, Ninth and Tenth Circuits.

* * *



Todd M. McGuire began his legal career in the litigation department at Sonnenschein Nath & Rosenthal (now known as Dentons), specializing in antitrust, white collar criminal defense and commercial litigation. In October 2001, Todd joined Stueve Siegel Hanson LLP and in January 2005, Todd was elected to the Firm's partnership.

Todd is an experienced commercial litigator and trial attorney. He has successfully represented clients in numerous jury trials in both federal and state court. Todd has also successfully represented clients involved in arbitration proceedings. In addition to trial work, Todd has successfully handled numerous appeals in both state and federal court. Todd is admitted to practice in federal and state courts in Missouri and Kansas, as well as before the Supreme Court of the United States and United States Court of Appeals for the Seventh, Eighth and Tenth Circuits.

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Todd E. Hilton began his legal career in the Kansas City office and national headquarters of Lathrop & Gage, L.C., specializing in wrongful death and catastrophic injury cases as well as consumer protection litigation. In October 2001, Todd joined Stueve Siegel Hanson, LLP as an associate. In June 2006, Todd was elected to the Firm's partnership as an equity partner. He continues to grow his practice at the Firm and specializes in the areas of wrongful death and catastrophic injury litigation, class action litigation, and complex business litigation.

Todd has spent his legal career serving as trial and appellate counsel for individuals, as well as both large and small companies, in a wide array of wrongful death and catastrophic injury litigation, product defect litigation, class action litigation, complex business litigation and environmental litigation. He has represented clients in state and federal courts as well as AAA arbitrations throughout the country - including in the states of Arizona, Arkansas, California, Colorado, Florida, Illinois, Kansas, Louisiana, Michigan, Missouri, New Jersey, New York, Oklahoma, Pennsylvania, Texas and Washington, D.C. Todd has also served in various capacities as co-lead counsel in complex cases and served on various Plaintiffs' Steering Committees.

* * *



Rachel E. Schwartz has significant litigation experience in courts across the country, where her practice focuses on antitrust and securities litigation. As a result of her work, Rachel has been repeatedly recognized as one of the "Local Litigation Stars" for the State of Missouri by *Benchmark Plaintiffs* and recognized by her peers in *Super Lawyers* as a Rising Star in 2011 and 2012 and a Missouri and Kansas *Super Lawyer* in 2013 and 2014. Most recently, Rachel was selected for inclusion in *The Best Lawyers® in America* 2015 in the field of Litigation-Securities.

Rachel was born in Illinois and raised in Lawrence, Kansas. Rachel received her B.A. with honors in Political Science, Economics and American Studies from the University of Kansas, where she was a member of Phi Beta Kappa and Mortar Board. She received her J.D. from the University of Michigan Law School, where she was an Associate Editor of the University of Michigan Journal of Law Reform. After practicing law in Dallas for three years, Rachel joined Stueve Siegel Hanson LLP in 2004 and was elected to the Firm's partnership as an equity partner in 2008.

Rachel currently serves on the Bench-Bar Committee for the United States District Court for the District of Kansas. In August 2013, she was appointed to the Merit Selection Panel for the Kansas City Magistrate Judge vacancy in the District of Kansas.

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Our Lawyers



Steve Six is an experienced trial attorney and has successfully tried complex cases before juries in state and federal court. In addition to his trial practice, Steve has maintained an active appellate practice and has successfully argued cases before state appellate courts in Kansas and Missouri, the federal appellate courts and before the United States Supreme Court. Steve has tried cases to verdict in a wide variety of areas, including product liability, professional liability, commercial cases and consumer fraud as well as prosecuting criminal cases. Steve has litigated cases before the Judicial Panel on Multidistrict Litigation and has significant experience in multi-district litigation. In addition to his litigation work, Steve serves as a mediator in a variety of matters including complex commercial, antitrust, and tort cases.

Steve received his J.D. from University of Kansas School of Law where he was a member of the Order of the Coif and a Rice Scholar. Steve joined Stueve Siegel Hanson following his term as the 43rd Attorney General of Kansas. As Attorney General, Steve successfully represented the State of Kansas in complex cases in various areas including healthcare, antitrust, environmental resources and consumer protection.

Prior to becoming Attorney General, Steve served as a district court judge in Kansas. Before taking the bench, Steve successfully prosecuted jury trials in both Kansas and Missouri state courts and in federal court.

* * *



Jason Hartley's practice includes class action litigation, antitrust and unfair competition, and music law. He is involved in all aspects of civil litigation and has handled cases in both federal and state courts, in litigation and at trial. For the past several years, his practice has involved primarily antitrust and consumer class actions, often representing the largest plaintiff class members in nationwide antitrust actions.

Jason has successfully represented plaintiffs in federal Section 1 (conspiracy) and Section 2 (monopoly) Sherman Act cases and in state law actions alleging unfair business practices, false advertising, warranty and Proposition 65 violations, among other claims. He has developed an expertise litigating against foreign defendants, most notably in Asia. Jason has served as lead counsel and in senior litigation roles in numerous class actions, which have collectively recovered billions of dollars for plaintiffs.

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Barrett Vahle represents businesses and individual clients in a broad range of litigation matters, from contract and antitrust disputes, to consumer and employment class actions. He was named a Missouri and Kansas *Super Lawyer* in 2013 and 2014. Before joining Stueve Siegel Hanson in 2009, Barrett practiced in the Kansas City office of Sonnenschein Nath & Rosenthal LLP (now known as Dentons), one of the largest law firms in the country. At Sonnenschein, Barrett concentrated his practice in business litigation, trade secret and non-compete litigation, white collar criminal defense, and appellate practice.

In 2004, Barrett obtained his J.D., with highest honors (graduating first in his class) from the University of Missouri – Columbia. During law school, he was Editor-in-Chief of the *Missouri Law Review*, and received the Judge Shepard Barclay Prize for the graduating law student "who has attained the highest standing in scholarship and moral leadership." After law school, Barrett was a law clerk for the Honorable Duane Benton of the United States Court of Appeals for the Eighth Circuit, and then for Judge Dean Whipple of the United States District Court for the Western District of Missouri.

* * *



Bradley Wilders received both his undergraduate and law degrees from the University of Missouri - Columbia. He began his professional legal employment as a law clerk for the Honorable John R. Gibson of the United States Court of Appeals for the Eighth Circuit. Brad had the rare opportunity to work on cases in five of the eleven federal circuit courts of appeals, including the First, Second, Sixth, Eighth, and Ninth.

Following his clerkship, Brad was an associate with the law firm Sidley Austin LLP in Chicago, Illinois. At Sidley, he practiced intellectual property litigation, where he defended one of the world's largest computer companies against multiple accusations of patent infringement. His cases included both software and hardware patent claims.

Brad joined Stueve Siegel Hanson as an associate in 2009 and was named Partner in 2015. He practices in patent, copyright, trademark, and antitrust litigation.

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Jeff Scurlock represents businesses and individual clients in a range of litigation matters from antitrust disputes to consumer and employment class actions. Jeff also provides research, writing and discovery support in a wide range of cases. This includes writing briefs and arguments to the court and drafting complex analyses on critical legal issues.

Jeff has sixteen years' experience in the practice of law. Before joining Stueve Siegel Hanson in 2012, Jeff practiced law at the The Henning Law Firm. He also served as a law clerk for the Honorable Thomas H. Newton, Missouri Court of Appeals. Additionally, Jeff practiced law for several years with Shook, Hardy & Bacon LLP in Kansas City, where he focused on complex products liability actions in state and federal courts across the United States.

Jeff received his J.D. from the University of Missouri-Kansas City School of Law, where he graduated first in his class, with distinction. He was a member of the Law Review and earned 16 CALI awards for academic excellence. Jeff is also a member of Phi Beta Kappa.

* * *



Lindsay Todd Perkins is an experienced legal writer and researcher, having honed her skills in these areas since being admitted to the bar. Lindsay collaborates with attorneys on a variety of matters on behalf of the firm's clients, developing strategies and arguments for briefings to the court and interpreting laws, rulings and regulations.

Lindsay earned her Juris Doctor from the University of Missouri at Kansas City School of Law, graduating first in her class. She was the Editor-in-Chief of the *UMKC Law Review*, and was a member of the National Moot Court team. Lindsay received an MBA from the University of Central Missouri and a bachelor's degree in psychology from Avila University. She is admitted to the bar in Missouri and Kansas.

After law school, Lindsay served as a law clerk for the Honorable Duane Benton of the Eighth Circuit Court of Appeals and the Honorable Otrrie D. Smith, District Court judge for the Western District of Missouri. Following her clerkships, Lindsay practiced commercial and employment litigation at the law firm of Spencer Fane Britt & Browne LLP.

Our Lawyers



Jason M. Lindner has a practice that includes litigation of antitrust, unfair competition, complex business, California wage and hour, Fair Labor Standards Act, and other general class action litigation. He has been involved in all aspects of civil litigation in both federal and state courts.

Jason has successfully represented plaintiffs in federal Section 1 (Conspiracy) and Section 2 (Monopoly) Sherman Act cases and in state law actions alleging unfair business practices. He has also represented classes of plaintiff employees under both the FLSA and under California State wage and hour statutes. He has served as lead counsel and in senior litigation roles in numerous class actions, which have collectively recovered billions of dollars for plaintiffs.

* * *



David Hickey represents businesses in a broad range of disputes, including antitrust claims, breach of contract, breach of fiduciary duty, and intellectual property claims. David also represents individual clients in a variety of matters, including violations of wage and hour laws and consumer protection laws.

David was born in Kansas City, Missouri and raised primarily in Overland Park, Kansas. David received his J.D. from the University of Kansas School of Law in 2009. During law school, David was selected to serve as Staff Editor of the Kansas Journal of Law & Public Policy and as a member of the University of Kansas Moot Court Council. David also interned as a clerk for the Honorable David J. Waxse, U.S. Magistrate Judge for the U.S. District Court, District of Kansas. In 2006, David graduated with a B.S. in Mechanical Engineering from the University of Kansas.

After law school, David practiced in Overland Park, Kansas where he represented individuals and small businesses in a variety of matters, including contract disputes, personal injuries, and violations of consumer protection laws. In 2010, David joined Stueve Siegel Hanson LLP, where he primarily handles complex business litigation.

Our Lawyers



Jennie Carter provides research, writing and discovery support to antitrust, class action, and wage and hour litigations. Jennie routinely adds value to our clients' cases by researching and writing on complex legal issues. She also analyzes large volumes of discovery material to expose key evidence for our clients.

Prior to joining Stueve Siegel Hanson in 2010, Jennie served as a law clerk for the Honorable Carlos Murguia in the U.S. District Court for the District of Kansas. Following her clerkship, Jennie practiced in the financial services department at the law firm of Polsinelli.

Jennie received both her undergraduate and law degrees from the University of Kansas. In law school, Jennie served as the Kansas Law Review Articles Editor, participated in the Judicial Clerkship Clinic, and volunteered for the Volunteer Income Tax Assistance program. She is admitted to the bar in Missouri and Kansas.

* * *



Stephanie Walters received her J.D. from the University of Missouri-Kansas City School of Law in 2007. During law school, she served as a Staff Editor of the UMKC Matrimonial Lawyer Law Journal, Executive Vice President of the Intellectual Property Law Society, and was a member of the UMKC School of Law Faculty Appointment Committee. Stephanie received an MBA from Webster University and a bachelor's degree in education from Missouri Western State University.

Stephanie joined Stueve Siegel Hanson as a staff attorney in April 2011. She became the firm's eDiscovery and Litigation Support counsel in May 2012. Stephanie counsels attorneys on electronic discovery issues including preservation, collection, search term negotiation, document review, ESI production, eDiscovery software, and forms of production. She has managed large scale document preservation, custodian interviews, ESI collection, review and production. In addition to managing the firm's ESI issues, Stephanie frequently trains attorneys to leverage review software for increased efficiency of review and for advanced searching functionality. She has experience using Summation, Concordance, Relativity, Kaleidoscope and CasePoint review software.

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James Vaglio received his bachelor's degree in political science with highest distinction and his M.B.A. with distinction from the University of Kansas, where he was a member of Phi Beta Kappa. He graduated from the University of Iowa College of Law in 2011. While in law school, James served as a legal intern in the University of Iowa Clinical Law Program and assisted California's Habeas Corpus Resource Center in post-conviction capital defense litigation.

James joined Stueve Siegel Hanson in 2012 where his practice focuses on antitrust litigation and class actions.

* * *



Austin Moore received his B.A. in Political Science from the University of Mississippi, where he graduated *summa cum laude* and was selected as a member of Phi Beta Kappa. In 2011, Austin earned his J.D. from the Washington University School of Law in St. Louis where he was an editor and published member of the Washington University Journal of Law & Policy and the 2011 recipient of the Mary Collier Hitchcock Prize, awarded to one student annually for outstanding legal writing.

Before joining Stueve Siegel Hanson in 2013, Austin was in private practice in St. Louis, Missouri, where he handled a number of complex commercial cases and maintained an active state and federal appellate practice. Austin focuses his practice on complex business litigation practice. Austin is a regular participant in multi-district litigation and has been at the forefront of prosecuting consumer class action claims in the emerging area of data breach litigation. Austin has experience litigating complex claims under the RICO Act, Sherman Act, Lanham Act, federal securities laws, and state antitrust and consumer protection statutes.

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Crystal R. Cook received her J.D. from the University of Kansas School of Law in 2013. During law school, Crystal was the Staff Editor and Co-Director of Alumni & Internal Relations of the *Kansas Journal of Law & Public Policy* and a recipient of the CALI Excellence for the Future Award in Construction Law & Litigation. Throughout law school, Crystal clerked at the Kansas Department of Transportation in the Office of Chief Counsel.

Prior to law school, Crystal worked in Washington, D.C. for over three years as an Executive Assistant at the White House and then as a Legislative Assistant at an international law firm providing legislative and government relations assistance to numerous clients on environmental, transportation, health care, and educational issues.

Crystal received her undergraduate degree from Fort Hays State University, cum laude, in 2007, while earning a double major in Political Science and History.

Crystal joined Stueve Siegel Hanson in 2013 where her practice includes class actions, antitrust litigation, and wage and hour litigation.

* * *



Abby E. McClellan received her J.D. from the University of Missouri – Kansas City (UMKC) School of Law in 2013. She received the CALI award for highest grade in Civil Procedure.

Abby received her undergraduate degree from Drury University, summa cum laude, in 2008, with a Bachelor of Arts in Elementary Education and a minor in Global Studies. Abby also studied International Law at Regents College in London and with the UMKC School of Law Ireland Program.

Abby joined Stueve Siegel Hanson in 2014 where her practice includes class actions, antitrust litigation, and wage and hour litigation. In 2016, Abby was named by Judge Kurt D. Engelhardt to the Plaintiffs' Steering Committee of the *Taxotere (Docetaxel) Products Liability Litigation*.

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Our Lawyers



Ethan M. Lange has been recognized by his peers as a go-to litigator. He was named by *Super Lawyers* as a “Rising Star” in both 2014 and 2015. He has successful first chair federal jury trial experience, among his other achievements at trial. In addition to his trial exposure, he has handled numerous hearings, depositions, mediations, and motions. He is experienced at all stages of litigation and is equipped to meet his clients’ goals and objectives. Ethan is known for his hard work ethic and representing his clients vigorously and ethically.

Ethan received his J.D., magna cum laude, from Baylor Law School, where he was the Editor-in-Chief of the Baylor Law Review. He was the Number One Speaker in the Dawson & Sodd Moot Court Tournament and was selected for membership in the Order of the Barristers. After law school, Ethan was a law clerk for the Honorable Ed Kinkeade of the United States District Court for the Northern District of Texas, Dallas Division. Before joining Stueve Siegel in 2015, Ethan practiced in the Dallas office of Locke Lord LLP. Ethan’s practice is concentrated in business litigation and arbitration.

* * *



J. Toji Calabro received his J.D. from Stanford Law School. He began his legal career in the New York and San Francisco offices of Quinn Emanuel where he gained significant experience in a broad range of commercial litigation matters including contract disputes, complex financial instruments, products liability, insurance and reinsurance disputes, and business torts.

Toji joined Stueve Siegel Hanson in 2015 where his practice includes commercial disputes, class actions and antitrust litigation.



Our Lawyers



Alexander T. Ricke is a go-to litigator for “bet the company” commercial cases as well as complex class actions. He regularly litigates business and class action cases in state and federal courts throughout the country. In commercial cases, Alex is a zealous advocate for his clients when their business and livelihood are in jeopardy. He also passionately represents plaintiffs in nationwide class actions for antitrust violations, wage and hour violations, defective products, and deceptive practices. In these high-stakes cases, Alex often litigates against lawyers from the largest firms in the country representing some of the most powerful companies in the world.

Prior to joining Stueve Siegel Hanson in 2016, Alex was in private practice in Kansas City, Missouri at a boutique complex litigation firm prosecuting business and class action cases around the country. In his practice, Alex has successfully resolved “bet the company” business cases for his clients as well as nationwide and statewide class actions for hundreds of thousands of class members.

Alex earned his Bachelor of Journalism from the University of Missouri in 2009, and earned his Juris Doctor from the University of Missouri School of Law in 2012. He is an active member of the Missouri Association of Trial Attorneys as well as the Kansas City Metropolitan Bar Association.

* * *



C. Curtis Shank joined Stueve Siegel Hanson LLP in 2016. His practice focuses on mass tort, class action, and antitrust cases. Before joining the firm, Curtis was an associate in the Kansas City office of Bryan Cave LLP, one of the largest law firms in the United States. At Bryan Cave, Curtis gained first-chair trial experience and handled a number of complex commercial cases in both state and federal courts.

Curtis earned his J.D., *magna cum laude*, Order of the Coif, from the University of Missouri School of Law 2013. Curtis went on to clerk for the Honorable Daniel D. Crabtree of the United States District Court for the District of Kansas, where he worked on a wide variety of civil and criminal matters. Curtis earned his B.A. in Economics, *summa cum laude*, from the University of Missouri – Kansas City.

More detailed biographies are available online at

www.stuevesiegel.com

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The Right Contingency.

Exhibit 2

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

Stueve Siegel Hanson LLP

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					
Jason Hartley	P	2017	0.00	\$825.00	\$0.00
Jason Hartley	P	2016	10.80	\$795.00	\$8,586.00
Jason Hartley	P	2015	20.40	\$725.00	\$14,790.00
Jason Hartley	P	2014	0.00	\$725.00	\$0.00
Jason Hartley	P	2013	5.00	\$700.00	\$3,500.00
Hiroshima Shiozaki	A	2015	217.00	\$400.00	\$86,800.00
NON-ATTORNEYS					
Tina Glover	PL	2017	0.00	\$175.00	\$0.00
Tina Glover	PL	2016	0.70	\$175.00	\$122.50
Tina Glover	PL	2015	0.00	\$175.00	\$0.00
Tina Glover	PL	2014	0.00	\$175.00	\$0.00
Tina Glover	PL	2013	0.70	\$175.00	\$122.50
TOTAL:			254.60		\$113,921.00

(P) Partner

(A) Associate

(INV) Investigator

Exhibit 3

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

Stueve Siegel Hanson LLP

Expenses Incurred

Inception through 8/31/2017

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	\$700.00
Computer Research (Lexis, Westlaw, PACER, etc.)	\$1,435.64
Document Production	
Experts / Consultants	
Messenger Delivery	
Photocopies - In House	
Photocopies - Outside	\$440.66
Postage	
Service of Process	
Overnight Delivery (Federal Express, etc.)	\$331.31
Telephone / Facsimile	
Transcripts (Hearings, Depositions, etc.)	
Travel (Airfare, Ground Travel)	\$1,548.40
Travel (Meals and Lodging)	\$366.16
TOTAL	\$4,822.17