

EXHIBIT T

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

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

18 IN RE: LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION

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

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

**DECLARATION OF STEVEN F. BENZ IN
SUPPORT OF DIRECT PURCHASER
PLAINTIFFS MOTION FOR AN AWARD
OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
INCENTIVE AWARDS**

1 I, Steven F. Benz, declare and state as follows:

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

8 2. My firm has served as counsel to class representative, Ritz Camera & Image, LLC
9 (“Ritz”) and as counsel for the Direct Purchaser Class (“Class”) throughout the course of this
10 litigation. The background and experience of Kellogg Hansen and its attorneys are summarized in
11 the *curriculum vitae* attached hereto as Exhibit 1.

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

16 4. During the pendency of the litigation, Kellogg Hansen performed the following
17 work: Kellogg Hansen produced documents from Ritz corporate files facing the usual challenges
18 presented by a bankrupt client. Ritz Camera and Imaging is a class representative and has been in
19 bankruptcy since 2012. During the class period, Ritz was the largest national retail camera chain
20 with over 1,200 stores at its peak and an online retail subsidiary. Except for a former employee
21 who served as Ritz’s corporate witness at deposition, no former employees were available to assist
22 with fact discovery. Ritz’s corporate computer systems were no longer operational. Repair
23 attempts were unsuccessful but ESI was produced after several hundred backup tapes were
24 catalogued, and suitable backup sets were restored for review by Kellogg attorneys. Paper-based
25 discovery was completed after a re-review of over 100 boxes at the Trustee’s archive storage
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1 facility in New Jersey. Kellogg Hansen used document production vendors sparingly, to minimize
2 costs, and relied on document populations gathered for unrelated litigation and used staff attorneys
3 and paralegals extensively. Fifty-seven percent of the firm's lodestar work was performed by staff
4 attorneys and paralegals. The blended rate for all Kellogg Hansen timekeepers, including two
5 partners and three associates, averaged approximately \$363 per hour. In addition to its document
6 discovery work, and to prepare and defend three client depositions, Kellogg Hansen received class
7 assignments to work with class economics experts, to review and prepare rebuttal to defendants'
8 expert reports, and to assist with briefing regarding the defendants' motions to exclude a number
9 of the DPP expert witnesses.
10

11 5. Attached hereto as Exhibit 2 is my firm's total hours and lodestar, computed at
12 historical rates, for the period of June 1, 2013 through August 31, 2017. This period reflects the
13 time spent after the appointment of Interim Co-Lead Counsel and Liaison Counsel for Direct
14 Purchased Plaintiffs ("DPP") in this litigation. The total number of hours spent by Kellogg
15 Hansen during this period of time was 3,284.70 hours, with a corresponding lodestar of
16 \$1,193,265.50. My firm's lodestar figures are based on the firm's historical billing rates, which do
17 not include charges for expense items. Expense items are billed separately and such charges are
18 not duplicated in my firm's billing rates. This summary was prepared from contemporaneous,
19 daily time records regularly prepared and maintained by my firm. The lodestar amount reflected
20 in Exhibit 2 is for work assigned by DPP Co-Lead Counsel, and was performed by professionals at
21 my law firm for the benefit of the Class.
22
23

24 6. Kellogg Hansen has reviewed the time and expense records that form the basis of
25 this declaration to correct any billing errors. In addition, my firm has removed all time entries and
26 expenses related to the following:

27 a. travel time, unless the attorney or professional was actively engaged in
28

1 preparation or work in connection with a particular assignment made by Co-Lead Counsel that
2 necessitated travel;

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

6 7. The hours my firm billed to the litigation for reading or reviewing pleadings, ECF
7 notices or other papers was, in every instance, necessary to keep my client, Ritz Camera & Image,
8 LLC, its bankruptcy trustee and bankruptcy counsel informed of events in the litigation.

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

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

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

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

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

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

25 8. My firm has expended a total of \$86,819.02 in unreimbursed costs and expenses in
26 connection with the prosecution of this litigation. These costs and expenses are broken down in
27 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs

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

5 9. Kellogg Hansen paid a total of \$85,000.00 in assessments for the joint prosecution
6 of the litigation against the Defendants.

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

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

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15 Executed on this 30 day of January, 2018 in Washington, D.C.

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STEVEN F. BENZ

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Exhibit 1

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
Sumner Square
Suite 400
1615 M Street, N.W.
Washington, D.C. 20036
(202) 326-7900

Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. was formed in the spring of 1993 by law school classmates Michael Kellogg, Peter Huber, and Mark Hansen (Harvard '82). The firm has grown rapidly since then. It now includes 32 Partners, 39 Associates, 3 Of Counsel, 19 Staff Attorneys, and 13 Paralegals and Researchers.

Our practice is focused on trials and appeals in federal and state courts across the United States and before federal agencies. This litigation builds on the experience of the firm's partners as lawyers at the Department of Justice and elsewhere in the federal government and in other endeavors. Michael Kellogg, Mark Hansen, Chris Todd, Reid Figel, Jim Webster, and Andrew Goldsmith served as Assistant United States Attorneys; Michael Kellogg and David Frederick served as Assistants to the Solicitor General; Rebecca Beynon served as Deputy General Counsel at the Office of Management and Budget and as a Special Assistant to the President; and Mike Guzman served as Principal Deputy Assistant Attorney General for the Environment and Natural Resources Division of the Department of Justice. Geoff Klineberg served as the Counselor on International Law in the Office of the Legal Adviser at the Department of State; and Sean Lev served as General Counsel of the Federal Communications Commission as well as Acting General Counsel and Deputy General Counsel for Environment & Nuclear Programs at the Department of Energy. Michael Kellogg, Peter Huber, and John Thorne wrote a leading treatise on federal telecommunications law; Peter Huber wrote the landmark Department of Justice report on the breakup of AT&T and is a leading author and speaker on

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

telecommunications and tort reform; David Frederick wrote a leading treatise on Supreme Court advocacy; Chris Todd served as a member of the Iran-Contra prosecution team; John Thorne was Senior Vice President and Deputy General Counsel at Verizon Communications Inc. where he headed Verizon's competition and intellectual property practice groups.

Our Lawyers

The firm's partners have been lead counsel in more than 100 federal and state trials and appeals, which includes more than 45 cases before the Supreme Court of the United States. The firm was founded with the conviction that able young lawyers can assume substantial responsibility at an early point in their careers for matters at both the trial and the appellate stages. We believe that this benefits both our clients, who receive cost-effective service from highly motivated attorneys, and the attorneys, who experience the satisfaction of practice.

Partners

Michael K. Kellogg,

Stanford University '76, Oxford University, St. Catherine's College '79,
Harvard Law School '82
Law Clerk to Judge Malcolm Wilkey and Justice William H. Rehnquist

Mark C. Hansen,

Dartmouth College '78, Harvard Law School '82
Law Clerk to Judge William H. Timbers

K. Chris Todd,

Texas Tech University '69, University of Texas Law School, Austin '72,
Cambridge University, Darwin College '74
Law Clerk to Judge William M. Taylor, Jr.

Reid M. Figel,

Middlebury College '78, New York University School of Law '82
Law Clerk to Judges George C. Pratt and James R. Browning

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University of Texas Law School, Austin '89
Law Clerk to Judge Joseph T. Sneed and Justice Byron R. White

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Law School '13
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* Not admitted in D.C.; practicing under supervision of the partners of the firm.

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Joanna T. Zhang,

University of Pennsylvania '09, Yale Law School '13
Law Clerk to Judges Gary Feinerman and Alex Kozinski

We encourage our associates to consider public service. We have seen our attorneys become judges and agency general counsels, as others have advanced to positions in the White House, the Justice Department, the Congress, the FCC, and the SEC. Still others are now professors at the nation's top law schools.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Our Matters

Our matters include antitrust, contract, fraud, product liability, and intellectual property actions, federal grand jury and SEC investigations, as well as telecommunications litigation for several industry leaders. These matters range from a complex 500-party interpleader action to relatively straightforward commercial disputes. We have appeared in state court and federal district court actions throughout the country, all of the federal courts of appeals, and the Supreme Court of the United States. A list of representative matters can be found on our website at <http://www.khhte.com/matters.php>.

Our Clients

Our clients include more than a dozen Fortune 100 corporations (in industries ranging from telecommunications, petroleum, computer manufacture and electrical controls, to entertainment and recreation), emerging biotechnology and telecommunications companies, a major health care company, and a leading economics consulting firm.

Exhibit 2

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

Kellogg Hansen Todd Figel & Frederick PLLC
 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					
Benz, Steven	P	2017	22.90	\$850.00	\$19,465.00
Benz, Steven	P	2016	223.30	\$850.00	\$189,805.00
Benz, Steven	P	2015	71.50	\$850.00	\$60,775.00
Benz, Steven	P	2014	28.70	\$800.00	\$22,960.00
Benz, Steven	P	2013	51.30	\$800.00	\$41,040.00
Conyngham, William	P	2017	0.80	\$650.00	\$520.00
Conyngham, William	P	2016	23.60	\$650.00	\$15,340.00
Conyngham, William	P	2016	71.50	\$350.00	\$25,025.00
Conyngham, William	P	2014	11.40	\$600.00	\$6,840.00
Conyngham, William	P	2015	138.90	\$350.00	\$48,615.00
Conyngham, William	P	2015	13.10	\$650.00	\$8,515.00
Conyngham, William	P	2014	3.00	\$350.00	\$1,050.00
Conyngham, William	P	2013	1.00	\$600.00	\$600.00
Collins, Jessica	A	2014	35.70	\$390.00	\$13,923.00
Collins, Jessica	A	2013	13.80	\$360.00	\$4,968.00
Duffy, Matthew	A	2016	36.50	\$395.00	\$14,417.50
Seligman, Matthew	A	2014	81.50	\$390.00	\$31,785.00
Seligman, Mathew	A	2013	113.50	\$360.00	\$40,860.00
Briggs, Kimberly	SA	2016	23.20	\$350.00	\$8,120.00
Briggs, Kimberly	SA	2015	18.50	\$350.00	\$6,475.00
Samuels, Thomas	SA	2017	2.00	\$350.00	\$700.00
Samuels, Thomas	SA	2016	120.50	\$350.00	\$42,175.00
Samuels, Thomas	SA	2015	796.00	\$350.00	\$278,600.00
Samuels, Thomas	SA	2014	13.50	\$340.00	\$4,590.00
Churella, Andrew	SA	2015	25.50	\$125.00	\$3,187.50
Hill, James	SA	2015	72.20	\$125.00	\$9,025.00

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

Kellogg Hansen Todd Figel & Frederick PLLC
 Reported Hours and Lodestar on a Historical Basis
 June 1, 2013 through August 31, 2017

NAME	STATUS	YEAR	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
Grody, Michael	SA	2015	76.10	\$350.00	\$26,635.00
Oyer, Jess	SA	2015	193.80	\$125.00	\$24,225.00
Sorensen, Andrew	SA	2015	32.50	\$350.00	\$11,375.00
Zuckman, Michael	SA	2015	102.80	\$350.00	\$35,980.00
Garnjost, Kurt	SA	2016	7.40	\$350.00	\$2,590.00
Garnjost, Kurt	SA	2015	133.50	\$350.00	\$46,725.00
Shea, Jeffrey	SA	2014	253.00	\$350.00	\$88,550.00
Little, Ronald	SA	2016	28.50	\$350.00	\$9,975.00
Rodriquez, Melissa	SA	2015	224.10	\$125.00	\$28,012.50
NON-ATTORNEYS					
Todd, Katia	PL	2017	16.00	\$85.00	\$1,360.00
Todd, Katia	PL	2016	24.30	\$85.00	\$2,065.50
Todd, Katia	PL	2015	135.10	\$85.00	\$11,483.50
Tapkas, Jason	PL	2015	0.50	\$85.00	\$42.50
Marini, Ripton	PL	2015	0.50	\$85.00	\$42.50
Sinn, Carver	PL	2016	6.50	\$175.00	\$1,137.50
Sinn, Carver	PL	2015	2.30	\$175.00	\$402.50
Crouch, Ronald	PL	2015	28.50	\$85.00	\$2,422.50
Cook, Caitlan	PL	2014	0.50	\$75.00	\$37.50
Brennan, James	PL	2016	1.30	\$85.00	\$110.50
Murphy, Bernadette	PL	2016	1.20	\$175.00	\$210.00
Murphy, Bernadette	PL	2015	2.90	\$175.00	\$507.50
TOTAL:			3,284.70		\$1,193,265.50

(P) Partner
 (A) Associate
 (SA) Staff Attorney
 (PL) Paralegal

Exhibit 3

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

Kellogg Hansen Todd Figel and Frederick, PLLC

Expenses Incurred

June 1, 2013 through August 31, 2017

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	\$0.00
Computer Research (Lexis, Westlaw, PACER, etc.)	\$6,913.06
Document Production	\$45,644.85
Experts / Consultants	\$0.00
Messenger Delivery	\$0.00
Photocopies - In House	\$0.00
Photocopies - Outside	\$0.00
Postage	\$0.00
Service of Process	\$0.00
Overnight Delivery (Federal Express, etc.)	\$49.50
Telephone / Facsimile	\$22.06
Transcripts (Hearings, Depositions, etc.)	\$3,131.70
Travel (Airfare, Ground Travel)	\$10,340.92
Travel (Meals and Lodging)	\$20,716.93
TOTAL	\$86,819.02