

# **EXHIBIT Z**

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

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

18 IN RE: LITHIUM ION BATTERIES  
ANTITRUST LITIGATION

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

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

**DECLARATION OF LINDA NUSSBAUM  
IN SUPPORT OF DIRECT PURCHASER  
PLAINTIFFS MOTION FOR AN AWARD  
OF ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES, AND  
INCENTIVE AWARDS**

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1 I, Linda Nussbaum, declare and state as follows:

2 1. I am a Director of the law firm of Nussbaum Law Group (“NLG”). 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 for the Direct Purchaser Class (“Class”) throughout  
8 the course of this litigation. The background and experience of NLG and its attorneys are  
9 summarized in the *curriculum vitae* attached hereto as Exhibit 1.

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

14 4. During the pendency of the litigation, NLG performed the following work:

- 15 • Service as a member of the Plaintiffs’ Steering Committee (“PSC”) appointed by  
16 the Court on July 10, 2013 through May 1, 2015, and continuing in a role  
17 supporting the leadership from May 1, 2015 to the present;
- 18 • Legal and factual research, document analysis, participation in strategy, preparation  
19 of detailed work product, Japanese language factual research and document review,  
20 and other assistance to lead counsel for the successful opposition to Toshiba  
21 Corporation’s motion for summary judgment on the grounds of withdrawal from  
22 the conspiracy;
- 23 • Preparation and drafting of Requests for Admission to multiple defendants  
24 regarding authenticity and the criteria for business records;
- 25 • Legal and factual research, analysis, preparation of work product and drafting of  
26 letters responding to multiple defendants’ objections to Requests for Admission;
- 27 • Document review, analysis and preparation of detailed work product

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1 summarizing defendants' document productions; and

- 2 • Document review, analysis and translation of Japanese language documents  
3 produced by defendants by attorneys fluent in Japanese and preparation of detailed  
4 work product related thereto.

5 5. Attached hereto as Exhibit 2 is my firm's total hours and lodestar, computed at  
6 historical rates, for the period of June 1, 2013 through August 31, 2017. This period reflects the  
7 time spent after the appointment of Interim Co-Lead Counsel and Liaison Counsel for Direct  
8 Purchased Plaintiffs ("DPP") in this litigation. The total number of hours spent by NLG during  
9 this period of time was 2443.1, with a corresponding lodestar of \$1,134,045.00. My firm's  
10 lodestar figures are based on the firm's historical billing rates which do not include charges for  
11 expense items. Expense items are billed separately and such charges are not duplicated in my  
12 firm's billing rates. This summary was prepared from contemporaneous, daily time records  
13 regularly prepared and maintained by my firm. The lodestar amount reflected in Exhibit 2 is for  
14 work assigned by DPP Co-Lead Counsel, and was performed by professionals at my law firm for  
15 the benefit of the Class.

16 6. NLG has reviewed the time and expense records that form the basis of this  
17 declaration to correct any billing errors. In addition, my firm has removed all time entries and  
18 expenses related to the following:

- 19 a. time spent reading or reviewing pleadings, ECF notices or other papers  
20 unless a necessary part of performing a specific assignment from Co-Lead Counsel;
- 21 b. travel time unless the attorney or professional was actively engaged in  
22 preparation or work in connection with a particular assignment made by Co-Lead Counsel which  
23 necessitated travel;
- 24 c. billing for time connected with creating timekeeping records or for the time  
25 of attorneys or staff expended in preparation of audited time records and expenses in support of  
26 DPPs' application for an award of attorneys' fees and reimbursement of expenses.

27 7. The hourly rates for the attorneys and professional support staff in my firm

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1 included in Exhibit 2 are the same as the regular rates charged for their services in non-contingent  
2 matters and/or which have been accepted in other complex or class action litigation subject to the  
3 hourly rate caps established by DPP Co-Lead Counsel, including:

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

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

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

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

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

16 8. My firm has expended a total of \$104.97 in unreimbursed costs and expenses in  
17 connection with the prosecution of this litigation. These costs and expenses are broken down in  
18 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs  
19 by my firm on a contingent basis and have not been reimbursed. The expenses incurred in this  
20 action are reflected on the books and records of my firm. These books and records are prepared  
21 from expense vouchers, check records and other source materials and represent an accurate  
22 recordation of the expenses incurred.

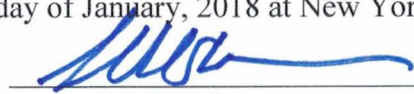
23 9. NLG paid a total of \$55,000 in assessments for the joint prosecution of the  
24 litigation against the Defendants.

25 10. My firm has carefully reviewed the time and expenses that comprise its reported  
26 lodestar and out of pocket expenses and represents that such lodestar and expenses comply with all  
27 material applicable terms of the May 21, 2013 letter from Co-Lead Counsel regarding Protocols

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1 for Maintaining and Reporting Time and Expense as well as Modified Pretrial Order No. 1 with  
2 Exhibit A (Dkt. No. 202, May 24, 2013).

3 I declare under penalty of perjury under the laws of the United States of America that the  
4 foregoing is true and correct. Executed on this 24<sup>th</sup> day of January, 2018 at New York, NY.

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7 LINDA NUSSBAUM

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# **Exhibit 1**

## NUSSBAUM LAW GROUP, P.C.

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New York, New York 10036-8718  
Telephone: (917) 438-9189  
[www.nussbaumlawgroup.com](http://www.nussbaumlawgroup.com)

### FIRM BIOGRAPHY

Nussbaum Law Group, P.C. (“NLG”) is a boutique litigation firm specializing in the prosecution of antitrust and other complex litigation. Linda Nussbaum, the firm’s founder, has been at the forefront of landmark fair competition cases for over 25 years. The firm’s experienced litigators have played leading roles in recovering billions of dollars for their clients from the world’s largest corporations, and have developed wide-ranging expertise litigating actions involving, among others, the pharmaceutical industry, the commodities markets, the banking and financial services industry.

#### MANAGING DIRECTOR: LINDA P. NUSSBAUM

Linda Nussbaum is the managing director of the Nussbaum Law Group, P.C. She is nationally recognized for her representation of class and individual plaintiffs in antitrust, RICO, CEA, and pharmaceutical litigation. She has served as sole or co-lead counsel in many significant class actions which have resulted in substantial recoveries, many in the realm of hundreds of millions of dollars. She has also represented large corporate clients including, among others, Hewlett-Packard Company, Kaiser Foundation Health Plan, Inc., Meijer, Inc., Bed Bath & Beyond Inc., Burlington Coat Factory Warehouse Corporation, Progressive Casualty Insurance Company, Avis Budget Group, Inc. and Wegmans Food Markets, Inc.

Ms. Nussbaum was selected “Litigator of the Week” by the AMLAW LITIGATION DAILY on April 2, 2010 for her lead counsel role in *Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals v. Pfizer*, where, after a six-week trial, a jury returned a RICO verdict for her clients. She was named as a finalist for Public Justice Foundation’s 2011 Trial Lawyer of the Year award. She was selected by Global Competition Review’s independent research with clients and peers as being among the world’s leading competition lawyers in 2016 and 2017. Ms. Nussbaum has lectured extensively about various aspects of antitrust and class action law. Recently, she moderated a panel discussion of Class Action Ethics in Antitrust cases at the 2015 American Antitrust Institute Private Enforcement Conference. She also participated in the American Bar Association, Section of Antitrust Law, 63<sup>rd</sup> Antitrust Law Spring Meeting, April 15-17, 2015 in a debate on “Beyond Reverse Payments: the New Frontiers in Pharmaceutical Antitrust.” In February 2015, she co-sponsored the American Antitrust Institute conference “After *Actavis*: Litigating Reverse Payment Cases.” In November 2012, she participated in a panel for the American Bar Association on FDA Citizen Petitions and *Noerr* Immunity. Ms. Nussbaum will serve as a faculty member of the Harris Martin Pharmaceutical Antitrust Litigation Conference: Generic Drugs & Emerging Price-Fixing Cases to be held on March 3, 2017. She has participated in many



other lectures and panel discussions and has spoken at the American Bar Association's Spring Meetings on a variety of antitrust topics over the past ten years. She has also has authored numerous publications.

Ms. Nussbaum's successful prosecution of complex litigation has been recognized and commended by judges in matters in which she has served as Direct Purchaser Class lead counsel.

Chief Judge Hogan of the District of Columbia commented in *In re Lorazepam & Clonazepam Antitrust Litigation*, No. 99-cv-00276 (D.D.C.):

**“Obviously, the skill of the attorneys, and I’m not going to spend the time reviewing it, I’m familiar with counsel, and they, as I said, are among the best antitrust litigators in the country.”**

From Judge Faith S. Hochberg of the District of New Jersey:

**“[W]e sitting here don’t get to see such fine lawyering, and it’s really wonderful for me both to have tough issues and smart lawyers. On behalf of the entire federal judiciary I want to thank you for the kind of lawyering we wish everybody would do.”**

Following the trial in *In re Neurontin Marketing and Sales Practices Litigation*, No. 04cv10981 (D. Mass.), Judge Patti Saris commented that:

**“[this was] a fabulous trial[.] [I]t’s the kind of thing that you become a judge to sit on.”**

Ms. Nussbaum is presently serving as lead class counsel in:

- *Castro v. Sanofi Pasteur Inc.* (D.N.J.)
- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.)
- *In re Aluminum Warehousing Antitrust Litigation* (S.D.N.Y.)
- *In re Zinc Antitrust Litigation* (S.D.N.Y.)
- *In re Actos Direct Purchaser Antitrust Litigation* (S.D.N.Y.)
- *Washington County Health Care Authority Inc. v. Baxter International Inc., et al.* (N.D. Ill.)

Ms. Nussbaum is presently serving as one of the allocation counsel in *In re Foreign Exchange Benchmark Antitrust Litigation* (S.D.N.Y.). She is a member of the Plaintiff Steering Committee (P.S.C.) in *In re Generic Drugs* (E.D.P.A.) and *In re Liquid Aluminum Sulfate Litigation* (D.N.J.)

Ms. Nussbaum has represented over a dozen major public companies in *In re Payment Card Interchange and Merchant Antitrust Litigation* (E.D.N.Y.). She is presently representing large corporate clients' in individual actions in *In re American Express Anti-Steering Rules Antitrust Litigation (No. II)* (E.D.N.Y.).

**DIRECTOR: BART D. COHEN**

Bart Cohen has over 20 years' experience in class actions and other complex litigation. Prior to joining the Nussbaum Law Group, he was a shareholder with one of the nation's preeminent class action firms, with an emphasis on federal antitrust litigation.

Mr. Cohen was part of a group of senior attorneys responsible for leading the prosecution of *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.), which resulted in the district court's approval of a settlement providing for \$5.7 billion in cash payments and injunctive relief worth billions more. In *Univac Dental Co. v. Dentsply, Int'l, Inc.* (M.D. Pa.), Mr. Cohen was solely responsible for the day-to-day prosecution of claims alleging monopolization on behalf of one of the defendant's former competitors. The case settled shortly before the trial date, after surviving dismissal, summary judgment and *Daubert* motions. Mr. Cohen maintained significant responsibility for representing a proposed nationwide class of ATM customers in antitrust litigation against a leading ATM network and several of the nation's largest banks in *In re ATM Fee Antitrust Litigation* (N.D. Cal.).

Mr. Cohen's writing as to antitrust issues has been published on Law360 and in several publications of the American Bar Association. His writing as to other issues has appeared in the Legal Intelligencer and publications of the Philadelphia Bar Association. He was rated as "a very strong litigator" in the Legal 500 in 2009 and 2010, and has been designated a "Pennsylvania Super Lawyer," a distinction awarded to only five percent of the attorneys in the state, in each of the nine years.

**DIRECTOR: BRADLEY J. DEMUTH**

Brad Demuth's practice focuses on antitrust and other complex commercial litigation. After serving as a law clerk to the United States Court of Appeals for the Second Circuit, Mr. Demuth worked for several years as an associate at two of the largest and most well-regarded defense firms in the world.

Mr. Demuth has extensive experience trying cases and litigating a range of antitrust and other complex commercial matters, including in the pharmaceutical, high-tech, luxury goods, finance, commodities, industrial materials, and sports league contexts. His most recent antitrust casework includes contributions in:

- *In re Foreign Exchange Benchmark Antitrust Litigation* (S.D.N.Y.)
- *In re Aluminum Warehousing Antitrust Litigation* (S.D.N.Y.)
- *In re Zinc Antitrust Litigation* (S.D.N.Y.)
- *In re Actos Direct Purchaser Antitrust Litigation* (S.D.N.Y.)
- *Castro v. Sanofi Pasteur, Inc.* (D.N.J.) (*re: Menactra*)

**OF COUNSEL, FORMER DIRECTOR: SUSAN R. SCHWAIGER**

Susan Schwaiger graduated *cum laude* from Brooklyn Law School in 1992 and has worked with Ms. Nussbaum since 1998. She practices in the area of antitrust and commodities litigation, with experience in cases involving a wide variety of industries including banking and financial services, pharmaceuticals and chemicals. Ms. Schwaiger has played a significant role in a number of major antitrust cases in which Ms. Nussbaum served as lead counsel including:

- *In re Lorazepam & Clorazepate Antitrust Litigation* (D.D.C.)
- *In re Microcrystalline Cellulose Antitrust Litigation* (E.D.P.A.)
- *In re Plastics Additives Antitrust Litigation* (E.D.P.A.)
- *In re Foundry Resins Antitrust Litigation* (S.D. Ohio)
- *In re Rubber Chemicals Antitrust Litigation* (N.D. Cal.)

Ms. Schwaiger currently devotes a substantial amount of her practice to antitrust and commodity class action and individual action litigation. Among the matters in which Ms. Schwaiger is presently involved are:

- *In re Automotive Parts Antitrust Litigation* (E.D. Mich.)
- *In re Packaged Seafood Products Antitrust Litigation* (S.D. Cal.)
- *In re Foreign Exchange Benchmark Antitrust Litigation* (S.D.N.Y.)

In addition, Ms. Schwaiger has been involved in representing individual plaintiffs in *In re Payment Card Interchange Fee and Merchant Antitrust Litigation* (E.D.N.Y.) and *In re American Express Anti-Steering Rules Antitrust Litigation (No. II)* (E.D.N.Y.). Prior to joining Nussbaum Law Group as a Director in April 2015, Ms. Schwaiger was a litigation associate with Shearman & Sterling, where her work included the constitutional case forcing The Citadel in Charleston, SC to admit women, and worked as an associate attorney in the antitrust practices of a number of plaintiffs' firms in New York City, including Pomerantz, Haudek, Block, Grossman & Gross LLP; Cohen Milstein Hausfeld & Toll, PLLC; Kaplan Fox & Kilsheimer LLP; and Grant & Eisenhofer P.A.

**OTHER NLG ATTORNEYS**

In addition to its Directors, Nussbaum Law Group is supported by other accomplished attorneys with extensive expertise in antitrust and other complex commercial matters, including Hugh D. Sandler and Peter Moran.

**Hugh D. Sandler, Special Counsel**

Prior to joining Nussbaum Law Group, Mr. Sandler spent seven years working for two international law firms in New York City. His practice experience includes drafting and arguing

pre-trial motions, deposing witnesses, defending witness depositions, preparing witnesses to testify, examining witnesses, cross-examining adverse witnesses at trial, and arguing appellate matters in both federal and state appeal courts.

His litigation experience, which is both international and domestic in scope, focuses on class actions and other complex disputes arising under the Racketeer Influenced and Corrupt Organizations Act (RICO), the Sherman Act, the Alien Tort Claims Act, the Anti-Terrorism Act, the Trafficking Victims Protection Act, the Civil Rights Act, Delaware corporate law, as well as actions in fraud, breach of fiduciary duties, breach of contract, and business-related torts.

In July 2015, Mr. Sandler (along with his trial co-counsel) was awarded Public Justice's Trial Lawyer of the Year award for his trial work in *David v. Signal* (E.D. La.). Additionally, Mr. Sandler has been recognized as a "Rising Star" by Thomson Reuters's *Super Lawyers* publication in both 2014 and 2015.

Mr. Sandler served as law clerk to the Judge Arthur Gans of the Ontario Superior Court. Mr. Sandler graduated from McGill University Faculty of Law, 2007, B.C.L. and LL.B., with great distinction, and obtained a joint honors B.A. in economics and political science from the University of Waterloo in 2003. He is proficient in French and is a member of the New York Public Library Young Lions Association.

#### **Peter E. Moran, Associate**

Prior to joining the Nussbaum Law Group, Mr. Moran was an associate with an international law firm in New York City in its Global Competition group where he represented commercial clients on a variety of antitrust and complex commercial litigation issues, including violations of the federal and state antitrust and consumer protection laws, antitrust compliance, internal investigations, individual civil and criminal liability and responding to federal and foreign regulators.

Mr. Moran has also represented pro bono clients before the New York Court of Appeals and Appellate Division, First Department and was a recipient of the 2011 Legal Aid Society Pro Bono Public Award for outstanding service.

Mr. Moran graduated *cum laude* from Brooklyn Law School in 2009, where he was a member of the Brooklyn Law School Journal of International Law and Moot Court Honor Society and recipient of several academic awards.

#### **Amal Bouhabib, Former Special Counsel**

Amal Bouhabib is a former special counsel with NLG. Prior to joining the Nussbaum Law Group, Ms. Bouhabib worked at an international law firm in New York City as an associate in its litigation and international arbitration groups. In her practice, she has represented international and domestic clients in all aspects of civil litigation, both state and federal, at the trial and appellate levels, and in international arbitration.

Ms. Bouhabib's litigation practice focuses on complex civil litigation and international disputes, including bringing and defending actions under foreign law, obtaining recognition and enforcement of foreign awards, representing foreign clients in U.S. federal litigation and litigating foreign discovery issues. She is also an active participant in pro bono matters, and recently second-chaired a precedent-setting five-week civil RICO and Trafficking trial, *David v. Signal* (E.D. La.), achieving the largest civil trafficking verdict in U.S. history. In July 2015, Ms. Bouhabib, along with her co-counsel, won Public Justice's 2015 Trial Lawyer of the Year award for *David*.

Ms. Bouhabib received her J.D. from Fordham University School of Law in 2010, where she was a Ruth Whitehead Whaley Scholar, a Stein Scholar for Public Interest, a Crowley Scholar in International Human Rights, and the recipient of the Ann Moynihan Award for Outstanding Performance in the law school's International Justice Clinic, where she represented a Guantanamo detainee in his habeas petition before the D.C. District Court.

## **OTHER NLG CONTRACT ATTORNEYS**

### **Mieko Hirai Braun**

Mieko Hirai Braun graduated from Western State University College of Law in Fullerton, CA in 2005. She has had extensive experience in Japanese legal document review, deposition preparation and translation since 2005 for numerous California firms in antitrust litigation, patent litigation, copyright and trademark infringement and including work with the U.S. Department of Justice and over 30 years of experience translating Japanese language documents in both Japan and the United States.

### **Gen Kimura**

Gen Kimura graduated from Indiana University School of Law in Indianapolis in 2007 and is an attorney licensed to practice in Texas since 2008, practicing in antitrust and trade law, class actions and immigration. He has had 10 years of experience in the legal review of Japanese language documents in antitrust litigation and regulatory compliance matters, including for *In re LCD Antitrust Litigation* and *In re Auto Parts Antitrust Litigation*.

### **Jamie R. Mogil**

Jamie Mogil graduated from New York Law School in 2005. She is admitted to practice law in New York. She was a Law Clerk in the King's County District Attorney's Office, the Office of the New York State Attorney General and the Philadelphia District Attorney's Office. She was a Senior Associate at Faruqi & Faruqi, LLP from 2006 to 2012 and has worked as an attorney instructor with the City of New York Board of Elections and Organizing for America. She has had extensive experience in document review and other associate work with Nussbaum Law Group since 2015.

# **Exhibit 2**

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

Nussbaum Law Group, P.C.

Reported Hours and Lodestar on a Historical Basis

June 1, 2013 through August 31, 2017

<b>NAME</b>	<b>STATUS</b>	<b>YEAR</b>	<b>TOTAL HOURS</b>	<b>HISTORICAL HOURLY RATE</b>	<b>LODESTAR</b>
<b>ATTORNEYS</b>					
Linda P. Nussbaum	P	2015	28.60	\$850.00	\$24,310.00
Bart Cohen	P	2017	0.20	\$850.00	\$170.00
Bart Cohen	P	2015	0.20	\$800.00	\$160.00
Bradley J. Demuth	P	2015	3.10	\$675.00	\$2,092.50
Susan R. Schwaiger	P	2016	54.90	\$750.00	\$41,175.00
Susan R. Schwaiger	P	2015	241.30	\$700.00	\$168,910.00
Susan R. Schwaiger	P	2015	37.50	\$675.00	\$25,312.50
Hugh D. Sandler	OC	2016	58.80	\$625.00	\$36,750.00
Hugh D. Sandler	OC	2015	4.80	\$600.00	\$2,880.00
Amal Bouhabib	OC	2013	138.50	\$600.00	\$83,100.00
Jamie Mogil	A	2016	40.50	\$450.00	\$18,225.00
Mieko Hirai Braun	A	2016	1,200.50	\$400.00	\$480,200.00
Gen Kimura	A	2015	575.80	\$400.00	\$230,320.00
Jason Andrew	A	2014	58.40	\$350.00	\$20,440.00
<b>TOTAL:</b>			<b>2,443.10</b>		<b>\$1,134,045.00</b>

(P) Partner

(OC) Of-Counsel/Special Counsel

(A) Associate

(INV) Investigator

# **Exhibit 3**



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

**EXHIBIT 3**

Nussbaum Law Group, P.C.

Expenses Incurred

June 1, 2013 through August 31, 2017

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Computer Research (Lexis, Westlaw, PACER, etc.)	\$104.97
<b>TOTAL</b>	<b>\$104.97</b>