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18 *Co-Lead Counsel for Direct Purchaser Plaintiffs*

19 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 20 **OAKLAND DIVISION**

21 IN RE: LITHIUM ION BATTERIES
 22 ANTITRUST LITIGATION

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

**SECOND SUPPLEMENTAL
 DECLARATION OF JAMES PAGE, ESQ.
 IN SUPPORT OF DIRECT PURCHASER
 PLAINTIFFS' MOTION FOR ORDER
 AUTHORIZING DISTRIBUTION OF
 REMAINING SETTLEMENT FUNDS**

24 This Document Relates to:
 25 *All Direct Purchaser Actions*

Judge: Hon. Yvonne Gonzalez Rogers

1 I, James E. Page, hereby declare as follows:

2 1. I am a Manager of Client Services employed by Epiq Class Actions & Claims
3 Solutions, Inc. (“Epiq”), the Settlement Administrator for the direct purchaser actions in the
4 above-captioned case. Epiq began working on this matter in March of 2016. I have worked for
5 Epiq and GCG, a company acquired by Epiq in 2018, since 2013. I am a licensed attorney in
6 Washington. I received my Juris Doctor degree from the University of Oklahoma Law School
7 in 2006 and my Bachelor of Arts degree from the University of Oklahoma in 2003. The
8 following statements are based on my personal knowledge and information provided by other
9 Epiq employees working under my supervision, and if called on to do so, I could and would
10 testify competently thereto.

11 2. I submit this Second Supplemental Declaration in support of Direct Purchaser
12 Plaintiffs’ Motion for an Order Authorizing Distribution of Remaining Settlement Funds (ECF
13 No. 2754) and in connection with Direct Purchaser Plaintiffs’ response to the Court’s Order
14 Requesting Clarification re: Motion for Order Authorizing Distribution of Remaining
15 Settlement Funds (ECF No. 2759).

16 3. My previous Declaration of James Page, Esq. in Support of Direct Purchaser
17 Plaintiffs’ Motion for Order Authorizing Distribution of Remaining Settlement Funds (ECF No.
18 2755) contained a typographical error in paragraph 9. The subtotal in this paragraph was
19 identified as \$778,521.56 when it should have been identified as \$788,521.56. All other figures
20 provided in paragraph 9 were correct, including the Total Remaining for Pro Rata Distribution:
21 \$651,552.60. I have provided a corrected chart with an accounting of the remaining settlement
22 funds below:


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Uncashed checks remaining after distribution to approved claimants	\$11,352.49
Funds remaining in settlement fund accounts as of April 30, 2022 (includes the \$250,000 reserve [authorized by ECF No. 2684, at ¶ 3] + interest in settlement fund accounts [see ECF No. 2584, at 10 nn.10–11] + the \$24.35 that could not originally be distributed due to fact that it is not possible for award values to be calculated at values less than a penny [see ECF No. 2584-1, at ¶ 30])	+ \$777,169.07
SUBTOTAL	\$788,521.56
Unpaid and future administration costs (authorized by ECF No. 2684)	- \$136,968.96
TOTAL REMAINING FOR PRO RATA DISTRIBUTION	= \$651,552.60

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2022 at Seattle, Washington.

By: 

 JAMES PAGE
 Manager of Client Services
 Epiq Class Action & Claims Solutions