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*Interim Co-Lead Counsel for Direct Purchaser Plaintiffs*

15  
16 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
17 **OAKLAND DIVISION**  
18

19 **IN RE: LITHIUM ION BATTERIES**  
20 **ANTITRUST LITIGATION**

Case No. 13-md-02420-YGR (DMR)  
MDL No. 2420

21 This Document Relates To:  
22 **ALL DIRECT PURCHASER ACTIONS**  
23

**DECLARATION OF GUY J. THOMPSON**  
**IN SUPPORT OF FINAL APPROVAL OF**  
**CLASS ACTION SETTLEMENTS WITH**  
**SONY DEFENDANTS**

24 Date: September 6, 2016  
25 Time: 2:00 p.m.  
Judge: Hon. Yvonne Gonzalez Rogers  
26 Courtroom: 1, 4th Floor  
27  
28

1 I, Guy J. Thompson, declare as follows:

2 1. I am employed by Epiq Systems (“Epiq”), located at 10300 SW Allen Boulevard,  
3 Portland, Oregon. Epiq was hired by class counsel as the Settlement Administrator in this matter.  
4 I am over 21 years of age and am not a party to this action. I have personal knowledge of the  
5 facts set forth herein and, if called as a witness, could and would testify competently thereto.

6 2. Prior to joining Epiq, I practiced law as an Assistant Attorney General for the  
7 Arizona Attorney General’s Office. I earned my Juris Doctorate from Notre Dame Law School.  
8 I am fully familiar with the actions taken by Epiq with respect to the Settlement as described  
9 below, and am competent to testify about them if called upon to do so. This declaration is based  
10 upon my personal knowledge and information provided to me by associates or staff under my or  
11 common supervision, and review of the business records maintained by Epiq. It is accurate and  
12 truthful to the best of my knowledge.

13 3. Epiq is a full-service data processing company that has been administering  
14 bankruptcies since 1985 and settlements since 1993, including settlements of class actions, mass  
15 tort matters, SEC and FTC disgorgement actions, and other major litigation. Our associates  
16 include technology experts, attorneys, paralegals, MBAs, and CPAs. Epiq has administered more  
17 than 1,000 settlements in some of the largest and most complex cases ever settled.

18 4. Epiq is a firm with more than 20 years of experience in data processing, claims  
19 processing, and settlement administration. Epiq’s class action case administration services include  
20 the coordination of all notice requirements, design of direct-mail notice, receipt and processing of  
21 opt-outs and objections by potential class members, coordination with the United States Postal  
22 Service, claims database management, claim adjudication, fund management, and distribution  
23 services. Epiq works with the settling parties, the Court, and the settlement class members in a  
24 neutral facilitation role, taking the negotiated terms of a settlement and implementing settlement  
25 administration services.

26 5. Between March 7 and April 8, 2016, Epiq received from Plaintiffs’ Counsel  
27 eighty-seven files that included the names and the addresses of all potential class members

1 identified by Defendants in this matter. Epiq formatted the list for mailing purposes, which  
2 included removing duplicate records and known Defendant entities, researching records that did  
3 not have a valid address, and running all records with a name and address through the National  
4 Change of Address Database to update any addresses on file with the United States Postal Service  
5 (“USPS”).

6 6. On April 26, 2016, Epiq caused the Sony Long-Form Notice to be printed and  
7 mailed to the 1,135,079 unique names and addresses on the class list. Epiq delivered the Sony  
8 Long-Form Notice to the United States Post Office located in Beaverton, Oregon. A true and  
9 correct copy of the Sony Long-Form Notice is attached hereto as *Exhibit A*.

10 7. On April 26, 2016, Epiq also established a case-dedicated website at  
11 [www.BatteriesDirectPurchaserAntitrustSettlement.com](http://www.BatteriesDirectPurchaserAntitrustSettlement.com). The website contains a “Frequently  
12 Asked Questions” page that provides similar information as the Long-Form Notice. The website  
13 also provides an “Important Documents” page that allows class members to review, print, or  
14 download copies of all case-related documents, including the *Preliminary Approval Order re*  
15 *Sony Settlement, Sony-DPP Settlement Agreement*, and Long-Form Notice. The “Home” page of  
16 the website provides all of deadlines relevant to the Sony settlement, as well as the Fairness  
17 Hearing date.

18 8. On April 26, 2016, Epiq made the toll-free telephone number (844) 778-5952  
19 available to potential class members. This phone number has been available since the  
20 aforementioned date and continues to be a resource for class members as of the date of this  
21 Declaration. The phone number provides class members with two types of support. First, it has  
22 an IVR feature, which is a 24-hour automated service that provides information regarding the  
23 Sony Settlement and answers frequently asked questions. Second, the IVR feature provides class  
24 members the option to speak with a live agent for additional information. The live agents are  
25 trained to answer class members’ questions regarding the Sony Settlement and claim filing  
26 process. The live agents are available Monday through Friday from 6:00am until 6:00pm (PST).  
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9. Epiq caused the Sony Short-Form Notice to class members to be published in the national edition of the *Wall Street Journal* on April 30, 2016. A true and correct copy of the tear sheet provided by the *Wall Street Journal* is attached hereto as *Exhibit B*.

10. The postmark deadline for class members to be excluded from the Sony Settlement Class was June 10, 2016. Epiq has received 98 requests for exclusion from the settlement. A report detailing the requests for exclusion received by Epiq is attached hereto as *Exhibit C*.

11. Epiq also received two articles of correspondence. These documents are attached hereto as *Exhibit D*, and they were previously filed with the Court. Dkt. Nos. 1250, 1251. No class member (or anyone else) filed a notice of intent to appear at the final approval hearing. No other objections have been received to date.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on July 28, 2016 at Beaverton, Oregon.

  
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Guy J. Thompson, Project Manager  
Epiq Class Action & Claims Solutions