# EXHIBIT 11

1	Counsel for Indirect Purchaser Plaintiffs	
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12	UNITED STATES	DISTRICT COURT
13	NORTHERN DISTR	ICT OF CALIFORNIA
14	OAKLANI	DIVISION
15		G N 12 MD 02420 VGD (DMD)
16	IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR)
17		MDL NO. 2420  DECLARATION OF JOSEPH M.
18		BREALL IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION
19	This Document Relates to:	FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
20	ALL INDIRECT PURCHASER ACTIONS	EXPENSES ON BEHALF OF BREALL & BREALL, LLP
21		BREADE, EDI
22		1
23		
24		
25		
26		
27		
28		
	DECLARATION OF JOSEPH M. BREALL IN AWARD OF ATTORNEYS' FEES AND REIM OF BREALL & BREALL, LLP; No. 13-md-024	BURSEMENT OF EXPENSES ON BEHALF

I, Joseph M. Breall, declare:

- 1. I am managing partner of Breall & Breall, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
- 2. My firm has served as counsel to Piya Rojanasathit and as counsel for IPPs throughout the course of this litigation. The background and experience of Breall & Breall, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.
- 3. Breall & Breall, LLP has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While Breall & Breall, LLP devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.
- 4. During the pendency of the litigation, Breall & Breall, LLP performed the following work: review complaint and amended pleadings, assist lead counsel in responding to written discovery, and preparing and attending oral depositions.
- 5. Attached hereto as **Exhibit B** is a billing summary of Breall & Breall, LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Breall & Breall, LLP during this period of time was 35.30, with a corresponding lodestar based on current rates of \$17,285.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Breall & Breall, LLP.
- 6. Attached hereto as **Exhibit C** is a list of the various billing rates each attorney my firm has billed at in this case.

- 1	
1	7. Attached hereto as <b>Exhibit D</b> is a compilation of my firm's detailed records at
2	historical billing rates. The entries in <b>Exhibit D</b> have been redacted per the Court's Order in ECF
3	No. 1803.
4	8. Attached hereto as <b>Exhibit E</b> is a summary of the expenses Breall & Breall, LLP
5	has incurred during the course of this litigation. Breall & Breall, LLP expended a total of \$350.00
6	in unreimbursed costs and expenses in connection with the prosecution of this case. These
7	expenses were incurred on behalf of IPPs by Breall & Breall, LLP on a contingent basis and have
8	not been reimbursed. The expenses reflected in <b>Exhibit E</b> were prepared from expense vouchers,
9	receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.
0	9. I have reviewed the time and expenses reported by Breall & Breall, LLP in this
1	case which are included in this declaration, and I affirm that they are true and accurate.
2	
3	I declare under penalty of perjury under the laws of the United States that the foregoing is
4	true and correct.
5	Executed on May 18, 2017 at San Francisco, California.
6	
7	/s/ Joseph M. Breall
8	Joseph M. Breall
9	
20	
21	
22	
23	
24	
25	
26	
27	1

1	ATTESTATION	
2	2 I, Steven N. Williams, hereby attest, pursuant to United States I	District Court, Northern
3	3 District of California Civil Local Rule 5-1(i)(3), that concurrence to the	e filing of this document
4	4 has been obtained from the signatory hereto.	
5	5	
6	6 By: /s/ Steven N	. Williams
7	7 Steven N.	Williams
8	8	
9	9	
0	0	
1	1	
2		
3	13	
4	14	
5	15	
6	16	
7	7	
8		
9		
20		
21		
22		
23		
24		
25		
26		
27	27	

## EXHIBIT A

## **JOSEPH M. BREALL**

Managing Partner at Breall & Breall, LLP 3625 California Street San Francisco, CA 94118

Tel: (415) 345-0541 Fax: (415) 345-0538 Email: jmbreall@breallaw.com

Joseph M. Breall is a founding partner of BREALL & BREALL, LLP. Mr. Breall has extensive courtroom experience successfully championing his clients' cases from pretrial hearings through trial verdicts and judgments. Mr. Breall has over twenty years experience in complex civil litigation, including mass torts, class action, real estate/construction defect and catastrophic loss actions. The majority of Mr. Breall's civil practice involves disputes over multi-million dollar claims.

Mr. Breall's case actions and settlements have been featured in articles in the *San Francisco Chronicle*, the *San Francisco Business Times*, the *Ming Pao Daily News*, and *The Recorder* regarding a wide spectrum of subjects such as Anti-SLAPP suits, ADA rights, City planning issues, wrongful Ellis Act evictions, and first Amendments Rights for religious minorities.

Mr. Breall has also spent extensive time working on pro-bono cases, including dog owners' rights to secure an off-leash policy at the Fort Funston National Park; and the right to allow the Falun Gong admittance to the annual San Francisco Chinese New Year Street Fair. Mr. Breall also has represented numerous arts organizations including S.F. Cameraworks.

Mr. Breall is a graduate of University of California Berkeley with a Bachelor's degree in History and Art History and is a graduate of University of California Hastings College of the Law. He is also a Black belt in Ensin Karate.

# EXHIBIT B

## IN RE: LITHIUM ION BATTERIES INDIRECT TIME REPORT- MONTHLY

Firm Name: Breall & Breall LLP

Reporting Period: 06/24/2013 - 01/12/2017

Categories:

(1) Investigations, Factual Research

(2) Drafting Discovery Requests

(3) Drafting Discovery Answers/Responses

(4) Deposition Taking

(5) Deposition Defending (6) Discovery Meet & Confer

(7) Document Review

(8) Drafting Pleadings, Briefs & Pretrial Motions

(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.

(10) Class Certification/Experts

(11) Litigation Strategy, Analysis & Case Management

(12) Negotiating Settlements

(13) Trial and Trial Preparation (14) Court Appearance and Prep

<b>D</b> \	Partner
	I AI UICI

(A) Associate (LC) Law Clerk

(PL) Paralegal

(L) Librarian

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Joseph M Breall (P)							5.70				1.30				7.00	\$650.00	\$4,550.00	7.00	\$4,550.00
Jill A Diamond (A)							2.10		3.50		2.80				8.40	\$450.00	\$3,780.00	8.40	\$3,780.00
Christina Nguyen (A)					6.40		6.90		1.90		4.20	0.50			19.90	\$450.00	\$8,955.00	19.90	\$8,955.00
															0.00	\$0.00	\$0.00		
															0.00	\$0,00	\$0.00		
															0.00	\$0.00	\$0.00		
SUB-TOTAL	0.00	0.00	0.00	0.00	6.40	0.00	14.70	0.00	5.40	0.00	8.30	0.50	0.00	0.00	35.30	\$1,550.00	\$17,285.00	35.30	\$17,285.00
NON-ATTORNEYS																			
															0.00	\$0.00	\$0.00		
															0.00	\$0.00	\$0.00		
															0.00	\$0.00	\$0.00		
															0.00	\$0,00	\$0.00		
															0.00	\$0.00	\$0.00		
															0.00	\$0.00	\$0.00		
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0.00	\$0.00
GRAND TOTAL:	0.00	0.00	0.00	0.00	6.40	0.00	14.70	0.00	5.40	0.00	8.30	0.50	0.00	0.00	35.30	\$1,550.00	\$17,285.00	35.30	\$17,285.00

## EXHIBIT C

## EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

## **BREALL & BREALL, LLP**

<u>ATTORNEYS</u>	DATE RANGE	HOURLY RATE
	June 2013	
Joseph M. Breall	to February 2017	\$650.00
	June 2013	
Jill L. Diamond	to May 2015	\$450.00
Jii L. Diamond	April 2015	φ430.00
	to February 2017	
Christina Nguyen		\$450.00
_		
NON-ATTORNEYS	DATE RANGE	HOURLY RATE

## EXHIBIT D

(REDACTED)



January 05, 2017 Invoice No: 14074

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 12/19/2016	Initials JMB	Code 7	Description (0.20), (0.10)	Hrs/Rate 0.30 650.00/hr	<u>Amount</u> 195.00
12/20/2016	JMB	7		0.30 650.00/hr	195.00
12/22/2016	JMB	7		0.30 650.00/hr	195.00
12/22/2016	CN	12		0.10 450.00/hr	45.00
	For profes	ssional s	ervices rendered	1.00	630.00

Name	Hours	Rate	Amount
Christina Nguyen	0.10	450.00	\$45.00
Joseph M. Breall (JMB)	0.90	650.00	\$585.00



February 01, 2017 Invoice No: 14104

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 1/4/2017	<u>Initials</u> JMB	Code 7	Description	Hrs/Rate 0.20 650.00/hr	<u>Amount</u> 130.00
1/6/2017	CN	12		0.20 450.00/hr	90.00
1/9/2017	CN	12		0.10 450.00/hr	45.00
1/12/2017	CN	7		0.10 450.00/hr	45.00
1/12/2017	CN	12		0.10 450.00/hr	45.00
	For profes	ssional s	ervices rendered	0.70	355.00

Name	Hours	Rate	Amount
Christina Nguyen	0.50	450.00	\$225.00
Joseph M. Breall (JMB)	0.20	650.00	\$130.00



March 01, 2016 Invoice No: 13877

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 2/9/2016	Initials JMB	Code 7	Description Review and analyze email from Krysta regarding discovery, protective order, and litigation hold, forward same to	Hrs/Rate 0.30 650.00/hr	Amount 195.00
2/11/2016	JMB	7	Review and analyze email from discovery, protective order, and litigation hold, forward same to	0.30 650.00/hr	195.00
2/25/2016	JMB	7	Review and analyze further email from Krysta regarding discovery, protective order, and litigation hold, forward same to	0.30 650.00/hr	195.00
2/26/2016	JMB	7	Review and analyze email from availability for deposition, reply to same	0.30 650.00/hr	195.00
2/26/2016	JMB	7	Review and analyze email from discovery regarding	0.30 650.00/hr	195.00
2/29/2016	CN	9	Preparation of email to Krysta enclosing executed protective order, litigation hold, confirming discovery responses, and providing availability	0.20 450.00/hr	90.00
2/29/2016	CN	9	Review and analyze email from Krysta requesting availability for a full day deposition	0.10 450.00/hr	45.00
2/29/2016	CN	9	Preparation of email to requesting availability for a full day deposition	0.10 450.00/hr	45.00
2/29/2016	CN	9	Preparation of email to Krysta of Susman Godfrey regarding deposition location	0.10 450.00/hr	45.00
2/29/2016	CN	9	Review and analyze email from Krysta of Susman Godfrey regarding deposition location, reply to same	0.10 450.00/hr	45.00
	For profe	essional s	services rendered	2 10 \$	1 245 00

For professional services rendered

2.10 \$1,245.00

Page 2

Name	Hours	Rate	Amount
Christina Nguyen	0.60	450.00	\$270.00
Joseph M. Breall (JMB)	1.50	650.00	\$975.00



April 04, 2016 Invoice No: 13883

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 3/7/2016	Initials CN	Code 9	Description Review and analyze email from Krysta of Susman Godfrey of Susman Godfrey regarding availability for deposition, reply to same	Hrs/Rate 0.20 450.00/hr	<u>Amount</u> 90.00
3/7/2016	CN	9	Review and analyze email from availability for deposition, reply to same	0.20 450.00/hr	90.00
3/8/2016	CN	9	Review and analyze email from Krysta of Susman Godfrey regarding supplemental interrogatories, verification, protective order, and litigation hold; reply to same and forward to	0.40 450.00/hr	180.00
3/8/2016	CN	7	Review and analyze email from enclosing signed verification and availability for deposition, reply to same	0.20 450.00/hr	90.00
3/8/2016	JMB	7	Review and analyze email from Krysta of Susman Godfrey regarding judge's order to emend responses to defendant's request from production and provide verifications, forward same to	0.50 650.00/hr	325.00
3/8/2016	CN	11	Voicemail from Demetrius of Cotchett Pitre & McCarthy regarding judge's order to amend responses to defendant's request for production and provide verifications	0.10 450.00/hr	45.00
3/8/2016	CN	11	Telephone conversation with Demetrius of Cotchett Pitre & McCarthy of Cotchett Pitre & McCarthy regarding judge's order to amend responses to defendant's request for production and provide verifications	0.10 450.00/hr	45.00
3/11/2016	CN	11	Preparation of email to regarding search for additional responsive documents and availability for deposition	0.10 450.00/hr	45.00
3/11/2016	CN	11	Review and analyze email from regarding search for additional responsive documents and availability for deposition, reply to same	0.10 450.00/hr	45.00

					Page 2
<u>Date</u> 3/14/2016	Initials CN	Code 11	Description Preparation of follow up email to regarding review of amended responses to defendant's request for production	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
3/14/2016	CN	7	Review and analyze email from confirming review of amended response to defendant's request for production and providing verification	0.10 450.00/hr	45.00
3/14/2016	CN	11	Preparation of email to Krysta of Susman Godfrey enclosing verification,	0.30 450.00/hr	135.00
3/14/2016	CN	11	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy regarding amended responses to request for production, reply to same	0.20 450.00/hr	90.00
3/14/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey confirming deposition, reply to same	0.20 450.00/hr	90.00
3/16/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding location of deposition, reply to same	0.20 450.00/hr	90.00
3/16/2016	CN	11	Preparation of email to deposition confirming	0.10 450.00/hr	45.00
3/17/2016	CN	11	Review and analyze email from regarding deposition preparation, reply to same	0.20 450.00/hr	90.00
3/17/2016	CN	11	Preparation of email to Krysta of Susman Godfrey regarding deposition preparation	0.10 450.00/hr	45.00
3/17/2016	CN	11	Review and analyze email from Krysta of Susman Godfrey regarding deposition preparation	0.10 450.00/hr	45.00
3/17/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding location of reply to same (0.10)	0.20 450.00/hr	90.00
3/17/2016	CN	11	Preparation of email to regarding change of location for deposition	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding deposition preparation (0.30), reply to same (0.20)	0.50 450.00/hr	225.00
3/18/2016	CN	7	Review and analyze email further from Krysta of Susman Godfrey regarding deposition preparation (0.10), reply to same (0.10)	0.20 450.00/hr	90.00

<u>Date</u> 3/18/2016	Initials CN	Code 11	Description Preparation of email to regarding deposition preparation	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
3/18/2016	CN	7	Review and analyze email from deposition preparation, reply to same	0.10 450.00/hr	45.00
3/18/2016	CN	11	Preparation of email to Krysta of Susman Godfrey confirming availability for deposition preparation	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to regarding production of responsive documents	0.20 450.00/hr	90.00
3/18/2016	JMB	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to regarding production of responsive documents	0.50 650.00/hr	325.00
3/18/2016	JMB	11	Voicemail from Demetrius of Cotchett Pitre & McCarthy regarding production of responsive documents	0.10 650.00/hr	65.00
3/18/2016	JMB	7	Review and analyze letter from Demetrius of Cotchett Pitre & McCarthy regarding indirect purchaser plaintiffs proposed settlement	0.80 650.00/hr	520.00
3/18/2016	JMB	7	Review and analyze indirect purchaser plaintiffs proposed settlement agreement	1.00 650.00/hr	650.00
3/18/2016	CN	7	Review and analyze email from to Demetrius of Cotchett Pitre & McCarthy regarding availability for production for responsive documents	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to regarding availability for production for responsive documents	0.20 450.00/hr	90.00
3/18/2016	JMB	7	Review and analyze further email from Demetrius of Cotchett Pitre & McCarthy to regarding availability for production of responsive documents	0.20 650.00/hr	130.00
3/29/2016	CN	7	Review and analyze email from to Demetrius of Cotchett Pitre & McCarthy regarding availability for production of responsive documents	0.10 450.00/hr	45.00
3/29/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy regarding availability for production of responsive documents	0.10 450.00/hr	45.00

						Page 4
Date 3/30/2016	Initials CN	Code 7	Description Review and analyze email from Demetrius of Cotchett Pi McCarthy regarding teleconference for remote production responsive documents, reply to same		Hrs/Rate 0.20 450.00/hr	Amount 90.00
For professional services rendered					8.30	\$4,355.00
			Timekeeper Summary			
Name				Hours	Rate	Amount
Christina Ng	juyen			5.20	450.00	\$2,340.00
Joseph M. B	Breall (JME	3)		3.10	650.00	\$2,015.00



May 02, 2016 Invoice No: 13906

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 4/1/2016	Initials JMB	Code 11	<u>Description</u> Teleconference for remote production of responsive documents.	Hrs/Rate 1.00 650.00/hr	<u>Amount</u> 650.00
4/1/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to regarding additional documents	0.20 450.00/hr	90.00
4/1/2016	CN	7	Review and analyze further email from Demetrius of Cotchett Pitre & McCarthy to regarding additional documents	0.20 450.00/hr	90.00
4/1/2016	CN	7	Review and analyze email from Michael to regarding documents produced/.	0.20 450.00/hr	90.00
4/4/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep	0.20 450.00/hr	90.00
4/4/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey enclosing defendant's request for production, set two, and responses and objection to same	0.20 450.00/hr	90.00
4/11/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to regarding teleconference to gather further responsive documents	0.20 450.00/hr	90.00
4/11/2016	CN	7	Review and analyze email from to Demetrius of Cotchett Pitre & McCarthy regarding teleconference to gather further responsive documents	0.10 450.00/hr	45.00
4/11/2016	CN	7	Review and analyze email from Brian Kim to regarding teleconference to gather further responsive documents	0.10 450.00/hr	45.00
4/11/2016	CN	7	Review and analyze email from Brian Kim to regarding further remote collection	0.20 450.00/hr	90.00
4/13/2016	CN	11	Teleconference for remote production of responsive documents	1.30 450.00/hr	585.00

					Page 2
<u>Date</u> 4/14/2016	Initials CN	Code 7	<u>Description</u> Review and analyze email from Krysta of Susman Godfrey regarding responses to defendant's special roggs, set three	Hrs/Rate 0.20 450.00/hr	Amount 90.00
4/14/2016	CN	9	Review and analyze responses to defendant's special roggs, set three	0.20 450.00/hr	90.00
4/18/2016	CN	11	Preparation of verification to responses to defendant's special roggs, set three	0.10 450.00/hr	45.00
4/19/2016	CN	7	Review and analyze email from enclosing verification to responses to defendant's special roggs, set	0.10 450.00/hr	45.00
4/19/2016	CN	11	three Preparation of email to confirming whether he has received any reimbursements for expenses	0.10 450.00/hr	45.00
4/19/2016	CN	7	Review and analyze email from confirming he has not received any reimbursements for expenses, reply	0.10 450.00/hr	45.00
4/19/2016	CN	11	Preparation of email to Krysta of Susman Godfrey enclosing verification to responses to special roggs, set three, and confirming that has not received any reimbursements for expenses.	0.20 450.00/hr	90.00
4/20/2016	CN	11	Preparation of email to Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep, reply to	0.10 450.00/hr	45.00
4/20/2016	CN	7	same Review and analyze email from Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep, reply to same	0.10 450.00/hr	45.00
4/20/2016	CN	7	Review and analyze further email from Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep, reply to same	0.10 450.00/hr	45.00
4/20/2016	CN	11	Preparation of email to enclosing deposition handout and fourth amended complaint for review before deposition prep, and link to discovery reviewed during deposition prep, reply to same	0.20 450.00/hr	90.00
4/25/2016	CN	7	Review and analyze email from that he reviewed the deposition handout and fourth amended complaint	0.10 450.00/hr	45.00
4/28/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey confirming deposition preparation, reply to same	0.10 450.00/hr	45.00
4/28/2016	CN	11	Preparation of email to deposition preparation	0.10 450.00/hr	45.00

						Page 3
<u>Date</u> 4/29/2016	Initials CN	Code 5	Description Deposition preparation with Krysta of Susman Godfrey and	ıd	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
	For profe	ssional s	ervices rendered	=	5.80	\$2,810.00
Name			Timekeeper Summary	Hours	Rate	Amount
Christina Ng Joseph M. B		3)		4.40 1.00	450.00 650.00	\$2,160.00 \$650.00



June 01, 2016 Invoice No: 13925

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 5/2/2016	Initials CN	Code 7	<u>Description</u> Review and analyze email from Krysta of Susman Godfrey regarding further deposition preparation	Hrs/Rate 0.10 450.00/hr	Amount 45.00
5/2/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey enclosing deposition notice	0.20 450.00/hr	90.00
5/2/2016	CN	11	Preparation of email to Krysta of Susman Godfrey regarding deposition	0.10 450.00/hr	45.00
5/2/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding deposition, reply to same	0.20 450.00/hr	90.00
5/2/2016	CN	11	Preparation of email to Krysta of Susman Godfrey and regarding further deposition preparation	0.20 450.00/hr	90.00
5/2/2016	CN	9	Review and analyze second amended responses to first set of special interrogatories	0.30 450.00/hr	135.00
5/4/2016	CN	5	Deposition preparation with Krysta of Susman Godfrey and	1.00 450.00/hr	450.00
5/4/2016	CN	5	Deposition of	5.30 450.00/hr	2385.00
5/16/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey to enclosing deposition transcript for review	0.20 450.00/hr	90.00
5/18/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding additional photos in our files, reply to same	0.20 450.00/hr	90.00
	For profe	ssional s	ervices rendered	7.80	\$3,510.00

Piya Rojanasathit Page 2

	Timekeeper Summary		
Name	Hours	Rate	Amount
Christina Nguyen	7.80	450.00	\$3,510.00



July 01, 2016 Invoice No: 13951

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 6/1//2016	Initials CN	Code 7	<u>Description</u> Review and analyze email from Krysta of Susman Godfrey regarding errata for his deposition	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
6/6/2016	CN	7	Review and analyze further email from Krysta of Susman Godfrey regarding errata for his deposition	0.10 450.00/hr	45.00
6/7/2016	CN	7	Review and analyze email from errata for his deposition regarding	0.10 450.00/hr	45.00
6/15/2016	CN	7	Review and analyze further email from Krysta of Susman Godfrey regarding errata for his deposition	0.10 450.00/hr	45.00
6/16/2016	CN	7	Review and analyze email from to Krysta of Susman Godfrey regarding errata for his deposition	0.10 450.00/hr	45.00
6/24/2016	CN	7	Review and analyze email from lead counsel's office regarding service tag (0.10), forward same to (0.10)	0.20 450.00/hr	90.00
6/24/2016	CN	7	Review and analyze email from to lead counsel's office regarding service tag	0.10 450.00/hr	45.00
6/24/2016	CN	7	Review and analyze email from lead counsel's office to regarding service tag	0.10 450.00/hr	45.00
	For profe	ssional s	services rendered	0.90	\$405.00

Name	•	Hours	Rate	Amount
Christina Nguyen		0.90	450.00	\$405.00



March 01, 2015 Invoice No: 13653

0.20

\$90.00

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

For professional services rendered

**Professional Services** 

Date<br/>2/18/2015Initials<br/>JDCode<br/>7Description<br/>Review and analyze status letter re GS Yuasa CorpHrs/Rate<br/>0.20<br/>450.00/hrAmount<br/>0.20<br/>450.00/hr

Name	Hours	Rate	Amount
Jill Diamond	0.20	450.00	\$90.00



April 01, 2015 Invoice No: 13667

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

**Professional Services** 

Date<br/>3/9/2015Initials<br/>JDCode<br/>7Description<br/>Review and analyze order regarding class representatives to<br/>submit supplemental informationHrs/Rate<br/>0.10Amount<br/>45.00

For professional services rendered 0.10 \$45.00

name	Hours	Rate	Amount
Jill Diamond	0.10	450.00	\$45.00



May 05, 2015 Invoice No: 13681

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 4/28/2015	<u>Initials</u> JD	Code 7	<u>Description</u> Review correspondence pertaining to defendant's discovery	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
4/28/2015	JMB	7	Review correspondence from co-counsel regarding defendant's discovery	0.10 650.00/hr	65.00
4/30/2015	JD	7	Review correspondence pertaining to defendant's discovery	0.10 450.00/hr	45.00
4/30/2015	JMB	11	Correspond with and co-counsel regarding defendant's discovery	0.20 450.00/hr	130.00
	For profe	ssional s	services rendered	0.50	\$285.00

Name	Hours	Rate	Amount
Jill Diamond	0.20	450.00	\$90.00
Joseph M. Breall (JMB)	0.30	650.00	\$195.00



March 05, 2014 Invoice No: 13532

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

**Professional Services** 

Date<br/>2/10/2014Initials<br/>JDCode<br/>7Description<br/>Review and analyze IPP letter re strike nationwide class<br/>allegationsHrs/Rate<br/>0.20Amount<br/>90.00

For professional services rendered 0.20 \$90.00

name	Hours	Rate	Amount
Jill Diamond	0.20	450.00	\$90.00



April 01, 2014 Invoice No: 13535

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### Professional Services

Professiona	Services			
<u>Date</u> <u>Initi</u> 3/11/2014 JD	als <u>Code</u> 7	<u>Description</u> Review and analyze stipulation and order regarding dismissal of claims	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
3/11/2014 JD	9	Review and analyze supplemental motion to dismiss	0.20 450.00/hr	90.00
For p	rofessional se	ervices rendered	0.30	\$135.00
		Timekeener Summary		

rimekeeper Summary	
	Ho

Name	Hours	Rate	Amount
Jill Diamond	0.30	450.00	\$135.00



September 01, 2014 Invoice No: 13585

In re Lithium Ion Batteries Antitrust Litigation In Reference to:

#### **Professional Services**

<u>Date</u> 8/12/2014	<u>Initials</u> JD	Code 7	<u>Description</u> Review and analyze updated discovery procedures regarding class representatives	Hrs/Rate 0.30 450.00/hr	<u>Amount</u> 135.00
8/15/2014	JD	7	Review and analyze discovery letter to Judge Ryu regarding class representatives	0.20 450.00/hr	90.00
	For profe	ssional s	services rendered	0.50	\$225.00

Name	Hours	Rate	Amount
Jill Diamond	0.50	450.00	\$225.00



October 01, 2014 Invoice No: 13593

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 9/22/2014	Initials JD	Code 9	<u>Description</u> Review and analyze preservation declaration	Hrs/Rate 0.20 450.00/hr	<u>Amount</u> 90.00
9/22/2014	JD	7	Review correspondence from lead counsel	0.20 450.00/hr	90.00
9/22/2014	JD	11	Draft correspondence regarding declaration and letter from lead counsel	0.40 450.00/hr	180.00
9/23/2014	JD	11	Further correspondence to regarding declaration and letter from lead counsel	0.30 450.00/hr	135.00
9/26/2014	JD	11	Correspond with regarding declaration	0.10 450.00/hr	45.00
9/29/2014	JD	7	Review and analyze product information	0.50 450.00/hr	225.00
9/29/2014	JD	11	Draft correspondence regarding preservation declaration and products	0.20 450.00/hr	90.00
9/30/2014	JD	11	Correspond with lead counsel regarding declaration and product questions	0.20 450.00/hr	90.00
	For profe	ssional s	ervices rendered	2.10	\$945.00

Name	Hours	Rate	Amount
Jill Diamond	2.10	450.00	\$945.00



December 01, 2014 Invoice No: 13617

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 11/12/2014	<u>Initials</u> JD	Code 7	Description Review correspondence from product	regarding	<u>Hrs/Rate</u> 0.10 450.00/hr	Amount 45.00
11/13/2014	JD	11	Correspond with purchases	regarding product	0.30 450.00/hr	135.00
ĺ	For profe	ssional s	services rendered		0.40	\$175.00

Name	Hours	Rate	Amount
Jill Diamond	0.40	450.00	\$175.00



July 01, 2013 Invoice No: 13475

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 6/24/2013	<u>Initials</u> JD	Code 11	<u>Description</u> Correspond with Demetrius of Coregarding case status and CAC	tchett Pitre & McCarthy	Hrs/Rate 0.10 450.00/hr	<u>Amount</u> 45.00
6/28/2013	JD	11	Correspond with	regarding protective order	0.20 450.00/hr	90.00
	For profe	ssional s	ervices rendered		0.30	\$135.00

Name	Hours	Rate	Amount
Jill Diamond	0.30	450.00	\$135.00

\_\_\_\_\_



August 01, 2013 Invoice No: 13479

In Reference to:

In re Lithium Ion Batteries Antitrust Litigation

#### **Professional Services**

<u>Date</u> 7/1/2013	<u>Initials</u> JD	Code 11	Description Correspond regarding agreement for consolidated amended complaint	Hrs/Rate 0.30 450.00/hr	<u>Amount</u> 135.00
7/3/2013	JD	11	Correspond with regarding consolidated amended complaint review	0.20 450.00/hr	90.00
7/3/2013	JD	11	Correspond with an analysis and counsel regarding corrections to consolidated amended complaint	0.20 450.00/hr	90.00
7/3/2013	JD	9	Review and analyze consolidated amended complaint	1.50 450.00/hr	675.00
7/9/2013	JD	9	Continue and review of analysis of consolidated amended complaint	0.60 450.00/hr	270.00
7/10/2013	JD	9	Continue analysis of consolidated amended complaint	1.00 450.00/hr	450.00
	For profe	ssional s	ervices rendered	3.80	\$1,710.00

Name	Hours	Rate	Amount
Jill Diamond	3.80	450.00	\$1,710.00

\_\_\_\_\_\_

September 03, 2013 Invoice No: 13486

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

**Professional Services** 

<u>Date</u> 8/5/2013	<u>Initials</u> JD	<u>Code</u> 11	Description Review and analyze IPP Report Regarding Underlying Cases	Hrs/Rate 0.30 450.00/hr	<u>Amount</u> 135.00	
	For profe	ssional s	ervices rendered	0.30	\$135.00	

Tim	keeper Summary		
Name	Hours	Rate	Amount
Jill Diamond	0.30 45	0.00	\$135.00

# EXHIBIT E

## **EXHIBIT E**

In re Lithium Ion Batteries Antitrust Litigation
BREALL & BREALL, LLP
Reported Expenses Incurred on Behalf of IPPs

## **EXPENSE REPORT**

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	\$350.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at \$0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	\$350.00