

Appendix A

In this Appendix, IPPs provide the summary charts described in paragraph 11 of the Northern District of California’s Procedural Guidance for Class Action Settlements. Paragraph 11 instructs that lead class counsel should provide certain information “for at least one of their past comparable settlements.” The first chart below is for *In re Static Random Access Memory (SRAM) Antitrust Litigation*, No. 4:07-md-01819-CW (N.D. Cal.), in which Cotchett, Pitre & McCarthy, LLP (“CPM”) was lead counsel for the direct purchaser class plaintiffs. The second chart below is for *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, No. M 02-cv-01486-PJH (N.D. Cal.), in which CPM was chair of the discovery committee for the direct purchaser class plaintiffs.

Postclaim Filing Audit	
In re SRAM DPP Antitrust Case	
<i>All figures are estimates based on public filings</i>	
	% Total Settlement
Settlement \$76.9 million	100%
Claims paid \$50,362,242.73	66%
Class members sent notice 3,892*	
Actual claims 64 (2%)	
Opt-outs 46 (1%)	
Average Recovery Per Claimant \$812,294.24	
Residual n/a	n/a
Cy pres distribution n/a	
Reversion n/a	
Attorney fees awarded \$25.6 million	33.3%
Ratio to distributed fund 0.51	
Attorney Costs \$3.6 million	5%
Ratio to distributed fund 0.07	
Administrative costs \$775,000**	1%

*This is the number of notices sent to directly to class members by first class mail that were not returned as undeliverable; indirect notice campaigns through publication also occurred.

**Estimated based on \$735,000 initially authorized by the court and additional reserve of \$40,000 authorized for incurred and future claims administration costs.

Postclaim Filing Audit	
In re DRAM DPP Antitrust Case	
<i>All figures are estimates based on public filings</i>	
	% Total Settlement
Settlement \$363.2 million	100%
Claims paid \$272,777,508.81	75%
Class members sent notice 1,017,868*	
Actual claims 19,835 (2%)	
Opt-outs 200 (0.02%)**	
Average Recovery Per Claimant \$13,752.33	
Residual \$1.5 million	0.4%
Cy pres distribution \$1,510,133.96	
Reversion n/a	
Attorney fees awarded \$90.8 million	25%
Ratio to distributed fund 0.33	
Attorney Costs \$4.3 million	1%
Ratio to distributed fund 0.02	
Administrative costs \$746,893.93	0.2%

*This is the number of notices sent to directly to class members by first class mail that were not returned as undeliverable; indirect notice campaigns through publication also occurred.

**Based on the opt-out information provided in connection with the last settlements in the litigation.