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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**
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16 IN RE: CAPACITORS ANTITRUST
LITIGATION

MASTER FILE NO. 14-cv-03264-JD

17 This Document Relates to:
18 ALL INDIRECT PURCHASER ACTIONS

**DECLARATION OF STEVEN N.
WILLIAMS IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
TO APPROVE PROGRAM TO
PROVIDE CLASS NOTICE AND TO SET
SCHEDULE FOR FINAL APPROVAL**

Date: November 10, 2016
Time: 10:00 a.m.
Place: Courtroom 11, 19th Floor

1 I, Steven N. Williams, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and
3 admitted to practice in this Court and the courts of the State of California. I am a partner with
4 Cotchett, Pitre & McCarthy, LLP (“CPM”), and Interim Co-Lead Counsel for Indirect Purchaser
5 Plaintiffs (“IPPs”).

6 2. I make this Declaration in support of IPPs’ motion to approve program to provide
7 class notice and to set a schedule for final approval of the proposed IPP settlements with
8 Defendants NEC TOKIN Corp./NEC TOKIN America Inc. (collectively, “NEC TOKIN”),
9 Nitsuko Electronics Corporation (“Nitsuko”), and Okaya Electric Industries Co, Ltd. (“Okaya”)
10 (collectively, the “Settlements” or the “Settling Defendants”). The matters described are based
11 on my personal knowledge, and if called as a witness, I could and would testify competently
12 thereto. I make this declaration pursuant to 28 U.S.C. § 1746.

13 3. IPPs solicited bids from a number of nationally-recognized notice providers to
14 prepare a program to provide notice to the classes of the Settlements with the Settling Defendants.
15 Each of the responding notice providers provided proposals. After review and analysis of the
16 proposals, IPPs concluded that the program proposed by A.B. Data, Inc., as described in the
17 motion and in the Declaration of Linda V. Young was most appropriate to provide notice to the
18 classes in accordance with Rule 23, due process, and in an efficient and effective manner.

19 4. Attached to this declaration as Exhibit 1 is a copy of the proposed short form notice.

20 5. Attached to this declaration as Exhibit 2 is a copy of the proposed long form notice.

21 Executed on October 6, 2016 in Burlingame, California.

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23 /s/ Steven N. Williams

24 Steven N. Williams