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7 *Class Counsel for Indirect Purchaser Plaintiffs*

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 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN FRANCISCO DIVISION**

13
 14 **IN RE: CAPACITORS ANTITRUST**
LITIGATION

MASTER FILE NO. 14-cv-03264-JD

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 17 **THIS DOCUMENT RELATES TO:**
 18 **ALL INDIRECT PURCHASER ACTIONS**

DECLARATION OF W. JOSEPH
BRUCKNER IN SUPPORT OF CLASS
COUNSEL’S APPLICATION FOR
ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES
SUBMITTED ON BEHALF OF
LOCKRIDGE GRINDAL NAUEN PLLP

Date: July 6, 2017
Time: 10:00 a.m.
Place: Courtroom 11, 19th Floor

Judge: Hon. James Donato

1 I, W. Joseph Bruckner, declare and state as follows:

2 1. I am a Partner of Lockridge Grindal Nauen PLLP (“LGN”), Counsel for Indirect
3 Purchaser Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of
4 Class Counsel’s interim application for attorneys’ fees and reimbursement of expenses reasonably
5 incurred in connection with the services rendered in this litigation on behalf of the class. I make
6 this declaration based on my personal knowledge and if called as a witness, I could and would
7 competently testify to the matters stated herein. The time expended preparing this Declaration is
8 not included.

9 2. I have reviewed the Court’s October 31, 2014 Order Appointing Interim Lead Class
10 Counsel (Dkt. 319) (“Order”), including in particular the Order’s provisions regarding fees, costs
11 and expenses. LGN has adhered to those provisions.

12 3. During the pendency of the litigation, LGN acted as class counsel to IPPs. LGN has
13 prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not
14 receive any compensation for prosecuting claims against the defendants. While LGN devoted its
15 time and resources to this matter, it has foregone other legal work for which it would have been
16 compensated.

17 4. During the course of this litigation, LGN has been involved in the following
18 activities on behalf of IPPs at the request and under the direction of Lead Counsel:

- 19 • Review and analyze client purchase data in preparation for amended complaint.
- 20 • Research, collect, and analyze client documents and data in preparation for
21 discovery.
- 22 • Conferences with clients regarding case allegations and supporting evidence.
- 23 • Coordinate and establish document database for processing plaintiff documents and
24 data.
- 25 • Research and organize with co-lead counsel protocols and process to collect
26 plaintiff documents and data in preparation for discovery responses.
- 27 • Coordinate and establish protocols and instructions with co-lead counsel for review,
28 analysis, and production of plaintiff documents and data.

- 1 • Conferences with plaintiffs regarding responses to discovery requests.
- 2 • Coordinate plaintiffs' document and data collection with forensic expert.
- 3 • Draft and finalize plaintiff responses to discovery requests.
- 4 • Coordinate with co-counsel finalizing plaintiff discovery responses in preparation to
- 5 serve same.
- 6 • Draft privilege and redaction logs regarding plaintiff documents.
- 7 • Participate in discovery conferences with defense counsel regarding document
- 8 productions and privilege issues.
- 9 • Review and analyze defendant documents, and draft outlines in preparation for
- 10 depositions of defendant witnesses.
- 11 • Review and coordinate document translations in preparation for depositions of
- 12 defendant witnesses.
- 13 • Coordinate information and arrangements with co-counsel regarding preparations
- 14 for depositions of defendant witnesses.
- 15 • Prepare for and depose defendant witnesses.
- 16 • Summarize depositions of defendant witnesses.
- 17 • Research, draft, and edit stipulation regarding authenticity and admissibility of
- 18 business records.
- 19 • Draft, serve and file attorney registrations and notices of appearance.

20 5. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at
21 historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time
22 spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours
23 spent by LGN during this period of time was 794.60, with a corresponding historical lodestar of
24 \$327,807.00. This summary was prepared from contemporaneous, daily time records regularly
25 prepared and maintained by LGN. The lodestar amount reflected in Exhibit A is for work assigned
26 by Lead Counsel, and was performed by professional staff at my law firm for the benefit of the IPP
27 Class.

ATTESTATION

I, Steven N. Williams, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from the signatory hereto.

By: /s/ Steven N. Williams
Steven N. Williams

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

EXHIBIT B**LOCKRIDGE GRINDAL NAUEN PLLP**

Expenses Incurred

November 1, 2014 – September 30, 2016

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$150,000.00
Court Costs / Filing Fees	\$1,331.00
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$102.67
Postage / U.S. Mail	\$6.45
Service of Process	\$
Messenger / Delivery	\$42.00
Hearing Transcripts	\$
Investigation	\$241.61
Lexis / Westlaw	\$125.72
Photocopies – In House	\$1,171.35
Photocopies – Outside	\$
Telephone / Telecopier	\$74.57
Travel – Transportation	\$1,479.32
Travel - Hotels	\$1,761.90
Travel – Meals	\$229.62
TOTAL:	\$156,566.21