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*Class Counsel for Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE: CAPACITORS ANTITRUST  
LITIGATION**

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

**MASTER FILE NO. 14-cv-03264-JD**

**DECLARATION OF R. ALEXANDER  
SAVERI IN SUPPORT OF CLASS  
COUNSEL’S APPLICATION FOR  
ATTORNEYS’ FEES AND  
REIMBURSEMENT OF EXPENSES  
SUBMITTED ON BEHALF OF SAVERI  
& SAVERI, INC.**

**Date: July 6, 2017  
Time: 10:00 a.m.  
Place: Courtroom 11, 19<sup>th</sup> Floor**

Judge: Hon. James Donato

1 I, R. ALEXANDER SAVERI, declare and state as follows:

2 1. I am Managing Partner of Saveri & Saveri, Inc., Counsel for Indirect Purchaser  
3 Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of Class  
4 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. The Firm has adhered to those provisions.

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

17 4. During the course of this litigation, Saveri & Saveri, Inc. has been involved in the  
18 following activities on behalf of IPPs at the request and under the direction of Lead Counsel: The  
19 Saveri Firm was the primary IPP contact and took the lead in discovery related matters concerning  
20 the search and production of documents with the five defendants who were exclusively film  
21 capacitor manufacturers (Shinyei, Taitso, Okaya, Nitsuko, and Soshin). The meet and confer  
22 process with these defendants included negotiating custodians, search terms, responses to requests  
23 for production of documents and interrogatory responses. The Saveri Firm handled the negotiations  
24 with third party distributors (Mouser, TTI, Sager, Newark Element 14, Allied Electronics) for  
25 transactional data for the experts. The Saveri Firm prepared for and defended three class  
26 representative depositions (Michael Brooks, Steve Wong, and J&O Electronics). The Saveri Firm  
27 prepared for and took both merits and 30(b)(6) depositions. Specifically, the Saveri Firm was in  
28 charge of taking the Taitso defendants depositions, including travel to Japan for Director

1 Ishigami's deposition. The Saveri Firm also worked on the motion for class certification, including  
2 the review and analysis of expert reports. Additionally, the Saveri Firm has been involved in  
3 negotiations for and compelling production of ESI and the review of foreign language documents.  
4 One of the Saveri attorneys is fluent in Japanese, Chinese, and English. He was involved in  
5 developing search terms and document review protocols for search and review of foreign language  
6 documents and deposition preparation.

7 5. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at  
8 historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time  
9 spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours  
10 spent by Saveri & Saveri, Inc. during this period of time was 3,160.10, with a corresponding  
11 historical lodestar of \$1,523,355. This summary was prepared from contemporaneous, daily time  
12 records regularly prepared and maintained by Saveri & Saveri, Inc. The lodestar amount reflected  
13 in Exhibit A is for work assigned by Lead Counsel, and was performed by professional staff at my  
14 law firm for the benefit of the IPP Class.

15 6. All of the services performed by Saveri & Saveri, Inc. in connection with this  
16 litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary  
17 duplication of services for which Saveri & Saveri, Inc. now seeks compensation. The lodestar  
18 calculations exclude time spent reading or reviewing work prepared by others or other information  
19 relating to the case unless related to preparation for or work on a matter specifically assigned to  
20 Saveri & Saveri, Inc. by Lead Counsel. The hourly rates for the attorneys and professional support  
21 staff in my firm included in Exhibit A are the usual and customary hourly rates charged by Saveri  
22 & Saveri, Inc.

23 7. Saveri & Saveri, Inc. has expended a total of \$164,483.94 in unreimbursed costs and  
24 expenses in connection with the prosecution of this litigation from November 1, 2014 through  
25 September 30, 2016. These costs and expenses are broken down in the chart attached hereto as  
26 **Exhibit B**. They were incurred on behalf of IPPs by Saveri & Saveri, Inc. on a contingent basis  
27 and have not been reimbursed. The expenses incurred in this action are reflected on the books and  
28

1 records of my firm. These books and records are prepared from expense vouchers, check records  
2 and other source materials and represent an accurate recordation of the expenses incurred. Expense  
3 documentation has been provided to Lead Counsel for review.

4 8. I have reviewed the time and expenses reported by my firm in this case which are  
5 included in this declaration, and I affirm that they are true and accurate to the best of my  
6 knowledge.

7 I declare under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct.

9  
10 Executed on May 15, 2017 at San Francisco, California.

11  
12 /s/ R. Alexander Saveri  
13 R. ALEXANDER SAVERI  
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**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 A**

SAVERI &amp; SAVERI, INC.

Hours Reported and Lodestar on a Historical Basis

November 1, 2014 – September 30, 2016

<b>Timekeeper</b>	<b>Professional Status</b>	<b>Hours</b>	<b>Rate</b>	<b>Total Lodestar</b>
Guido Saveri	P	199.30	\$950	\$189,335.00
R. Alexander Saveri	P	8.20	\$700	\$5,740.00
Cadio Zirpoli	P	617.60	\$650	\$401,440.00
Lisa Saveri	OC	.50	\$675	\$337.50
Geoffrey C. Rushing	OC	31.80	\$700	\$22,260.00
Carl Hammarskjold	A	5.50	\$400	\$2,200.00
Carl Hammarskjold	A	1.30	\$350	\$455.00
David Hwu	A	1,555.80	\$400	\$622,320.00
David Hwu	A	290.60	\$350	\$101,710.00
Matthew Heaphy	A	4.60	\$475	\$2,185.00
Matthew Heaphy	A	17.00	\$300	\$5,100.00
Travis Manfredi	A	316.40	\$400	\$126,560.00
Travis Manfredi	A	43.20	\$350	\$15,120.00
William Heye	A	54.30	\$475	\$25,792.50
Jae Hun Lim	PL	14.00	\$200	\$2,800.00
<b>Grand Total:</b>		<b>3,160.10</b>		<b>\$1,523,355.00</b>

*In re Capacitors Antitrust Litigation*

Case No. 14-cv-03264-JD

**EXHIBIT B**

SAVERI &amp; SAVERI, INC.

Expenses Incurred

November 1, 2014 – September 30, 2016

<b>EXPENSE CATEGORY</b>	<b>AMOUNT INCURRED</b>
Assessments	\$150,000.00
Court Costs / Filing Fees	\$416.00
Experts / Consultants	\$0.00
Federal Express / UPS / Ontrac	\$42.91
Postage / U.S. Mail	\$0.00
Service of Process	\$0.00
Messenger / Delivery	\$0.00
Hearing Transcripts	\$0.00
Investigation	\$0.00
Lexis / Westlaw	\$3,998.30
Photocopies – In House	\$3,470.75
Photocopies – Outside	\$0.00
Telephone / Telecopier	\$136.12
Travel – Transportation	\$6,264.88
Travel - Hotels	\$0.00
Travel – Meals	\$154.98
<b>TOTAL:</b>	<b>\$164,483.94</b>