

GUSTAFSON GLUEK PLLC

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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**

MASTER FILE NO. 14-cv-03264-JD

THIS DOCUMENT RELATES TO:

ALL INDIRECT PURCHASER ACTIONS

**DECLARATION OF DANIEL C.
HEDLUND IN SUPPORT OF CLASS
COUNSEL’S APPLICATION FOR
ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES
SUBMITTED ON BEHALF OF
GUSTAFSON GLUEK PLLC**

Date: October 18, 2018

Time: 10:00 a.m.

Place: Courtroom 11, 19th Floor

Judge: Hon. James Donato

1 I, Daniel C. Hedlund, declare and state as follows:

2 1. I am a member of Gustafson Gluek PLLC, Counsel for Indirect Purchaser Plaintiffs
3 (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of Class Counsel’s
4 interim application for attorneys’ fees and reimbursement of expenses reasonably incurred in
5 connection with the services rendered in this litigation on behalf of the indirect purchaser class. I
6 make this declaration based on my personal knowledge and if called as a witness, I could and
7 would competently testify to the matters stated herein.

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

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

16 4. During the course of this litigation, Gustafson Gluek PLLC has been involved in the
17 following activities on behalf of IPPs at the request and under the direction of IPP Lead Counsel:
18 prepared for and took numerous depositions in the U.S. and Asia; met and conferred with
19 numerous third parties regarding responses and objections to subpoenas and productions of data
20 and documents for expert analysis; conferred with experts and co-counsel regarding economic
21 analysis of third party data; prepared for and assisted with defense of class representative at
22 deposition; prepared for, attended and participated in third party depositions; assisted and prepared
23 expert for deposition; assisted expert with materials for expert report; conferred with client (a
24 named plaintiff and proposed class representative) to keep apprised of case status; reviewed,
25 analyzed and coded foreign language documents.

26 5. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at
27 historical rates, from October 1, 2016, through March 31, 2018. The total number of hours spent
28 by Gustafson Gluek PLLC during this period of time was 3,020.20, with a corresponding historical

1 lodestar of \$1,224,793.00. This summary was prepared from contemporaneous, daily time records
2 regularly prepared and maintained by Gustafson Gluek PLLC. The lodestar amount reflected in
3 Exhibit A is for work assigned by Lead Counsel, and was performed by professional staff at my
4 law firm for the benefit of the IPP Class during the aforementioned time period.

5 6. All of the services performed by Gustafson Gluek PLLC in connection with this
6 litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary
7 duplication of services for which Gustafson Gluek PLLC now seeks compensation. The lodestar
8 calculations exclude time spent reading or reviewing work prepared by others or other information
9 relating to the case unless related to preparation for or work on a matter specifically assigned to
10 Gustafson Gluek PLLC by Lead Counsel. The hourly rates for the attorneys and professional
11 support staff in my firm included in Exhibit A are the usual and customary hourly rates charged by
12 Gustafson Gluek PLLC.

13 7. Gustafson Gluek PLLC has expended a total of \$99,212.76 in unreimbursed costs
14 and expenses in connection with the prosecution of this litigation from October 1, 2016 through
15 March 31, 2018. These costs and expenses are broken down in the chart attached hereto as **Exhibit**
16 **B**. They were incurred on behalf of IPPs by Gustafson Gluek PLLC on a contingent basis and have
17 not been reimbursed. The expenses incurred in this action are reflected on the books and records of
18 my firm. These books and records are prepared from expense vouchers, check records and other
19 source materials and represent an accurate recordation of the expenses incurred. Expense
20 documentation has been provided to Lead Counsel for review.

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

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

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Executed on July 18, 2018 at Minneapolis, Minnesota.

/s/ Daniel C. Hedlund
Daniel C. Hedlund

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ATTESTATION

I, Adam J. Zapala, 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/ Adam J. Zapala
Adam J. Zapala

EXHIBIT A

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

EXHIBIT A

GUSTAFSON GLUEK PLLC

Hours Reported and Lodestar on a Historical Basis

October 1, 2016 – March 31, 2018

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
Daniel E. Gustafson	P	26.20	\$1,025	\$26,855.00
Jason S. Kilene	P	0.50	\$800	\$400.00
Jason S. Kilene	P	2.40	\$850	\$2,040.00
Daniel C. Hedlund	P	5.60	\$800	\$4,480.00
Daniel C. Hedlund	P	177.30	\$850	\$150,705.00
Daniel C. Hedlund	P	82.70	\$875	\$72,362.50
Michelle J. Looby	P	0.3	\$600	\$180.00
Joseph C. Bourne	A	1.80	\$435	\$783.00
Joseph C. Bourne	P	174.80	\$450	\$78,660.00
Joseph C. Bourne	P	12.20	\$475	\$5,795.00
Masamichi Inoue	A	2238.30	\$350	\$783,405.00
Danette K. Mundahl	PL	1.20	\$150	\$180.00
Daniel J. Nordin	A	48.70	\$450	\$21,915.00
Brittany N. Resch	A	154.0	\$350	\$53,900.00
Brittany N. Resch	A	27.10	\$375	\$10,162.50
Chelsea M. Noble	PL	9.00	\$150	\$1,350.00
Jamie L. Holzer	PL	58.10	\$200	\$11,620.00
Grand Total:		3,020.20		\$1,224,793.00

EXHIBIT B

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

GUSTAFSON GLUEK PLLC

Expenses Incurred

October 1, 2016 – March 31, 2018

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$75,000.00
Court Costs / Filing Fees	\$
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$1,013.03
Postage / U.S. Mail	\$
Service of Process	\$
Messenger / Delivery	\$
Hearing Transcripts	\$
Investigation	\$
Lexis / Westlaw	\$97.22
Photocopies – In House	\$1,754.40
Photocopies – Outside	\$28.65
Telephone / Telecopier	\$86.35
Travel – Transportation	\$14,642.75
Travel - Hotels	\$5,313.01
Travel – Meals	\$1,277.35
TOTAL:	\$99,212.76