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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
P.L.L.P.

Date: October 18, 2018
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 P.L.L.P. (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 indirect
6 purchaser classes. I make this declaration based on my personal knowledge and if called as a
7 witness, I could and 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, LGN, acted as class counsel to IPPs. The
12 LGN has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it
13 would not receive any compensation for prosecuting claims against the defendants. While LGN
14 devoted its time and resources to this matter, it has foregone other legal work for which it would
15 have been compensated.

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

- 18 • Researched and analyzed documents in preparation for deposition;
- 19 • Drafted deposition outlines;
- 20 • Organized deposition exhibit documents;
- 21 • Strategized and prepared for depositions with co-lead counsel;
- 22 • Deposed defendant witnesses;
- 23 • Prepared client plaintiff and named class representative plaintiffs documents for
24 production to defendants;
- 25 • Coordinated production of plaintiff documents to defendants;
- 26 • Researched and analyzed documents in preparation to defend plaintiff depositions;
- 27 • Prepared for and strategized with co-lead counsel to defend named class
28 representative plaintiff depositions;

- 1 • Researched and analyzed defendant document production deficiencies and privilege
- 2 claims; and
- 3 • Researched and responded to defendant document claw back request.

4 5. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at
5 historical rates, from October 1, 2016 through March 31, 2018. The total number of hours spent by
6 LGN during this period of time was 328.10, with a corresponding historical lodestar of
7 \$144,334.00. This summary was prepared from contemporaneous, daily time records regularly
8 prepared and maintained by LGN. The lodestar amount reflected in Exhibit A is for work assigned
9 by Lead Counsel, and was performed by professional staff at my law firm for the benefit of the IPP
10 Class during the aforementioned time period.

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

18 7. LGN has expended a total of \$84,439.45 in unreimbursed costs and expenses in
19 connection with the prosecution of this litigation from October 1, 2016 through March 31, 2018.
20 These costs and expenses are broken down in the chart attached hereto as **Exhibit B**. They were
21 incurred on behalf of IPPs by LGN on a contingent basis and have not been reimbursed. The
22 expenses incurred in this action are reflected on the books and records of my firm. These books and
23 records are prepared from expense vouchers, check records and other source materials and
24 represent an accurate recordation of the expenses incurred. Expense documentation has been
25 provided to Lead Counsel for review.

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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

LOCKRIDGE GRINDAL NAUEN PLLP

Hours Reported and Lodestar on a Historical Basis

October 1, 2016 – March 31, 2018

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
W. Joseph Bruckner	Partner	11.00	\$850	\$9,350.00
Elizabeth R. Odette	Partner	0.70	\$600	\$420.00
Elizabeth R. Odette	Partner	2.80	\$575	\$1,610.00
Brian D. Clark	Senior Associate	116.20	\$500	\$58,100.00
Simeon A. Morbey	Associate	0.50	\$445	\$222.50
Simeon A. Morbey	Associate	162.20	\$420	\$68,124.00
Elizabeth M. Sipe	Senior Paralegal	0.80	\$275	\$220.00
Elizabeth M. Sipe	Senior Paralegal	14.20	\$200	\$2,840.00
R. David Hahn	Law Clerk	19.70	\$175	\$3,447.50
Grand Total:		328.10		\$144,334.00

EXHIBIT B

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

EXHIBIT B

Lockridge, Grindal Nauen PLLP

Expenses Incurred

October 1, 2016 – March 31, 2018

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$75,000.00
Court Costs / Filing Fees	\$335.00
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$173.51
Postage / U.S. Mail	\$0.46
Service of Process	\$
Messenger / Delivery	\$48.00
Hearing Transcripts	\$
Investigation	\$
Lexis / Westlaw	\$7.90
Photocopies – In House	\$1,097.10
Photocopies – Outside	\$
Telephone / Telecopier	\$54.02
Travel – Transportation	\$3,571.65
Travel - Hotels	\$3,820.28
Travel – Meals	\$331.53
TOTAL:	\$84,439.45