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10 *Class Counsel for Indirect Purchaser Plaintiffs*

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

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

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

MASTER FILE NO. 14-cv-03264-JD

DECLARATION OF DANIEL R. SHULMAN IN SUPPORT OF CLASS COUNSEL'S APPLICATION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES SUBMITTED ON BEHALF OF GRAY, PLANT, MOOTY, MOOTY & BENNETT, P.A.

Date: July 6, 2017

Time: 10:00 a.m.

Place: Courtroom 11, 19th Floor

Judge: Hon. James Donato

1 I, Daniel R. Shulman, declare and state as follows:

2 1. I am a Principal of Gray, Plant, Mooty, Mooty & Bennett, P.A. (“Gray Plant”),
3 Counsel for Indirect Purchaser Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I submit this
4 declaration in support of Class Counsel’s interim application for attorneys’ fees and reimbursement
5 of expenses reasonably incurred in connection with the services rendered in this litigation on behalf
6 of the class. I make this declaration based on my personal knowledge and if called as a witness, I
7 could and would competently testify to the matters stated herein. The time expended preparing this
8 Declaration is 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, Gray Plant acted as class counsel to IPPs.
13 Gray Plant has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it
14 would not receive any compensation for prosecuting claims against the defendants. While Gray
15 Plant devoted its time and resources to this matter, it has foregone other legal work for which it
16 would have been compensated.

17 4. During the course of this litigation, Gray Plant has been involved in the following
18 activities on behalf of IPPs at the request and under the direction of Lead Counsel: Review of
19 decision regarding Motion to Dismiss and create and manage database of documents produced in
20 litigation.

21 5. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at
22 historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time
23 spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours
24 spent by Gray Plant during this period of time was 8.90, with a corresponding historical lodestar of
25 \$3,473.00. This summary was prepared from contemporaneous, daily time records regularly
26 prepared and maintained by Gray Plant. The lodestar amount reflected in Exhibit A is for work
27 assigned by Lead Counsel, and was performed by professional staff at my law firm for the benefit
28 of the IPP Class.

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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

GP:4880054 v1

In re Capacitors Antitrust Litigation
Case No. 14-cv-03264-JD

EXHIBIT A

[Gray, Plant, Mooty, Mooty & Bennett, P.A.]

Hours Reported and Lodestar on a Historical Basis

November 1, 2014 – September 30, 2016

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
Daniel Shulman	Partner	2.30	\$850.00	\$1,955.00
Jennifer Pulkrabek	Paralegal	6.60	\$230.00	\$1,518.00
Grand Total:		8.90		\$3,473.00

In re Capacitors Antitrust Litigation
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EXHIBIT B

[Gray, Plant, Mooty, Mooty & Bennett, P.A.]

Expenses Incurred

November 1, 2014 – September 30, 2016

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$
Court Costs / Filing Fees	\$ 305.00
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$
Postage / U.S. Mail	\$
Service of Process	\$
Messenger / Delivery	\$
Hearing Transcripts	\$
Investigation	\$
Lexis / Westlaw	\$
Photocopies – In House	\$
Photocopies – Outside	\$
Telephone / Telecopier	\$
Travel – Transportation	\$
Travel - Hotels	\$
Travel – Meals	\$
TOTAL:	\$ 305.00