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1	W. Joseph Bruckner (State Bar No.147758) Heidi M. Silton (State Bar No. 25759X)					
2	Elizabeth R. Odette (State Bar No. 340698) Brian D. Clark (State Bar No. 0390069)					
3	LOCKRIDGE GRINDAL NAUEN PLLP 100 Washington Avenue South, Suite 2200					
4	Minneapolis, MN 55401 Tel: (612) 339-6900					
5	Fax: (612) 339-0981 wjbruckner@locklaw.com					
6	hmsilton@locklaw.com erodette@locklaw.com					
7	bdclark@locklaw.com					
8	Class Counsel for Indirect Purchaser Plaintiffs					
9						
10	UNITED STATES	DISTRICT COURT				
11	NORTHERN DISTRICT OF CALIFORNIA					
12	SAN FRANCISCO DIVISION					
13	SAN FRANCISCO DI VISION					
14	IN RE: CAPACITORS ANTITRUST	MASTER FILE NO. 14-cv-03264-JD				
15	LITIGATION	DECLARATION OF W. JOSEPH				
16		BRUCKNER IN SUPPORT OF CLASS COUNSEL'S APPLICATION FOR				
17	THIS DOCUMENT RELATES TO:	ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES				
18	ALL INDIRECT PURCHASER ACTIONS	SUBMITTED ON BEHALF OF LOCKRIDGE GRINDAL NAUEN PLLP				
19 20		Date: July 6, 2017 Time: 10:00 a.m. Place: Courtroom 11, 19 <sup>th</sup> Floor				
21		Judge: Hon. James Donato				
22		Judge. Hon. James Donato				
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DECLARATION OF W. JOSEPH BRUCKNER ISO IPPS' MOTION FOR ATTORNEYS' FEES AND EXPENSES; Case No. 14-cv-03264-JD

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

- 1. I am a Partner of Lockridge Grindal Nauen PLLP ("LGN"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of Class Counsel's interim application for attorneys' fees and reimbursement of expenses reasonably incurred in connection with the services rendered in this litigation on behalf of the class. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein. The time expended preparing this Declaration is not included.
- 2. I have reviewed the Court's October 31, 2014 Order Appointing Interim Lead Class Counsel (Dkt. 319) ("Order"), including in particular the Order's provisions regarding fees, costs and expenses. LGN has adhered to those provisions.
- 3. During the pendency of the litigation, LGN acted as class counsel to IPPs. LGN has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While LGN devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.
- 4. During the course of this litigation, LGN has been involved in the following activities on behalf of IPPs at the request and under the direction of Lead Counsel:
  - Review and analyze client purchase data in preparation for amended complaint.
  - Research, collect, and analyze client documents and data in preparation for discovery.
  - Conferences with clients regarding case allegations and supporting evidence.
  - Coordinate and establish document database for processing plaintiff documents and data.
  - Research and organize with co-lead counsel protocols and process to collect plaintiff documents and data in preparation for discovery responses.
  - Coordinate and establish protocols and instructions with co-lead counsel for review,
     analysis, and production of plaintiff documents and data.

- Conferences with plaintiffs regarding responses to discovery requests.
- Coordinate plaintiffs' document and data collection with forensic expert.
- Draft and finalize plaintiff responses to discovery requests.
- Coordinate with co-counsel finalizing plaintiff discovery responses in preparation to serve same.
- Draft privilege and redaction logs regarding plaintiff documents.
- Participate in discovery conferences with defense counsel regarding document productions and privilege issues.
- Review and analyze defendant documents, and draft outlines in preparation for depositions of defendant witnesses.
- Review and coordinate document translations in preparation for depositions of defendant witnesses.
- Coordinate information and arrangements with co-counsel regarding preparations for depositions of defendant witnesses.
- Prepare for and depose defendant witnesses.
- Summarize depositions of defendant witnesses.
- Research, draft, and edit stipulation regarding authenticity and admissibility of business records.
- Draft, serve and file attorney registrations and notices of appearance.
- 5. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours spent by LGN during this period of time was 794.60, with a corresponding historical lodestar of \$327,807.00. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by LGN. The lodestar amount reflected in Exhibit A is for work assigned by Lead Counsel, and was performed by professional staff at my law firm for the benefit of the IPP Class.

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- 6. All of the services performed by LGN in connection with this litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary duplication of services for which LGN now seeks compensation. The lodestar calculations exclude time spent reading or reviewing work prepared by others or other information relating to the case unless related to preparation for or work on a matter specifically assigned to LGN by Lead Counsel. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit A are the usual and customary hourly rates charged by LGN.
- 7. LGN has expended a total of \$156,566.21 in unreimbursed costs and expenses in connection with the prosecution of this litigation from November 1, 2014 through September 30, 2016. These costs and expenses are broken down in the chart attached hereto as **Exhibit B**. They were incurred on behalf of IPPs by LGN on a contingent basis and have not been reimbursed. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred. Expense documentation has been provided to Lead Counsel for review.
- 8. I have reviewed the time and expenses reported by my firm in this case which are included in this declaration, and I affirm that they are true and accurate to the best of my knowledge.

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

Executed on May 11, 2017 at Minneapolis, MN.

/s/W. Joseph Bruckner W. Joseph Bruckner

**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

#### LOCKRIDGE GRINDAL NAUEN PLLP

Hours Reported and Lodestar on a Historical Basis

November 1, 2014 – September 30, 2016

Timekeeper	Professional	Hours	Rate	Total Lodestar
	Status			
Richard A. Lockridge	Partner	1.80	\$900	\$1,620.00
W. Joseph Bruckner	Partner	47.80	\$850	\$40,630.00
Heidi M. Silton	Partner	5.70	\$750	\$4,275.00
Robert J. Schmit	Partner	.30	\$750	\$225.00
Robert J. Schmit (at rate cap)	Partner	110.00	\$300	\$33,000.00
Elizabeth R. Odette	Partner	20.20	\$550	\$11,110.00
Brian D. Clark	Senior Associate	180.30	\$500	\$90,150.00
Rachel A. Kitze Collins	Associate	8.20	\$450	\$3,690.00
Simeon A. Morbey	Associate	200.10	\$420	\$84,042.00
Jacob M. Saufley	Associate	1.50	\$300	\$450.00
Rachel Y. Zhang	Associate	119.00	\$325	\$38,675.00
Elizabeth M. Sipe	Senior Paralegal	78.70	\$200	\$15,740.00
Heather N. Potteiger	Senior Paralegal	21.00	\$200	\$4,200.00
	Grand Total:	794.60		\$327,807.00

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