

1 Meredith & Associates
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9 *Class Counsel for Indirect Purchaser Plaintiffs*

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

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

17
18 **THIS DOCUMENT RELATES TO:**
19 **ALL INDIRECT PURCHASER ACTIONS**

MASTER FILE NO. 14-cv-03264-JD

DECLARATION OF JOEL C. MEREDITH IN SUPPORT OF CLASS COUNSEL'S APPLICATION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES SUBMITTED ON BEHALF OF MEREDITH & ASSOCIATES

Date: October 18, 2018
Time: 10:00 a.m.
Place: Courtroom 11, 19th Floor

Judge: Hon. James Donato

1 I, Joel C. Meredith, declare and state as follows:

2 1. I am a Partner of Meredith & Associates, 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 classes. 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, Meredith & Associates, acted as class counsel
12 to IPPs. Meredith & Associates has prosecuted this litigation solely on a contingent-fee basis, and
13 has been at risk that it would not receive any compensation for prosecuting claims against the
14 defendants. While Meredith & Associates devoted its time and resources to this matter, it has
15 foregone other legal work for which it would have been compensated.

16 4. During the course of this litigation, Meredith & Associates has been involved in the
17 following activities on behalf of IPPs at the request and under the direction of IPP Lead Counsel:
18 This includes preparation for and depositions of various defendants employees; and, preparation
19 for and defense of Deposition of Florida plaintiff, Jorge Valdes .

20 5. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at
21 historical rates, from October 1, 2016 through March 31, 2018. The total number of hours spent by
22 Meredith & Associates during this period of time was 58.90 with a corresponding historical
23 lodestar of **\$46,236.50**. This summary was prepared from contemporaneous, daily time records
24 regularly prepared and maintained by Meredith & Associates. The lodestar amount reflected in
25 Exhibit A is for work assigned by Lead Counsel, and was performed by professional staff at my
26 law firm for the benefit of the IPP Class during the aforementioned time period.

27 6. All of the services performed by Meredith & Associates in connection with this
28 litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary

1 duplication of services for which Meredith & Associates now seeks compensation. The lodestar
2 calculations exclude time spent reading or reviewing work prepared by others or other information
3 relating to the case unless related to preparation for or work on a matter specifically assigned to
4 Meredith & Associates by Lead Counsel. The hourly rates for the attorneys and professional
5 support staff in my firm included in Exhibit A are the usual and customary hourly rates charged by
6 Meredith & Associates.

7 7. Meredith & Associates (and its predecessor, Meredith & Narine) has expended a
8 total of \$239.05 in unreimbursed costs and expenses in connection with the prosecution of this
9 litigation from October 1, 2016 through March 31, 2018. These costs and expenses are broken
10 down in the chart attached hereto as **Exhibit B**. They were incurred on behalf of IPPs by Meredith
11 & Associates on a contingent basis and have not been reimbursed. The expenses incurred in this
12 action are reflected on the books and records of my firm. These books and records are prepared
13 from expense vouchers, check records and other source materials and represent an accurate
14 recordation of the expenses incurred. Expense documentation has been provided to Lead Counsel
15 for review.

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

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

21
22 Executed on July 18, 2018 at Philadelphia, PA.

23
24 /s/Joel C. Meredith
Joel C. Meredith

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

Meredith & Associates

Hours Reported and Lodestar on a Historical Basis

October 1, 2016 – March 31, 2018

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
Joel C. Meredith	P	58.90	\$785.00	\$46,236.50
Grand Total:		58.90	785.00	\$46,236.50

EXHIBIT B

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

Meredith & Associates

Expenses Incurred

October 1, 2016 – March 31, 2018

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$
Court Costs / Filing Fees	\$
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$62.05
Postage / U.S. Mail	\$
Service of Process	\$
Messenger / Delivery	\$
Hearing Transcripts	\$
Investigation	\$
Lexis / Westlaw	\$
Photocopies – In House	\$44.00
Photocopies – Outside	\$
Telephone / Telecopier	\$
Travel – Transportation	\$
Travel - Hotels	\$33.00
Travel – Meals	\$100.00
TOTAL:	\$239.05