

EXHIBIT I

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7 *Interim Lead Counsel for the Putative Indirect Purchaser Classes*

8
 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

12 **IN RE CAPACITORS ANTITRUST**
13 **LITIGATION**

MDL No. 3:17-md-02801-JD
Case No. 3:14-cv-03264-JD

14 **This Documents Relates to:**
 15 **ALL INDIRECT PURCHASER ACTIONS**

DECLARATION OF PLAINTIFF Michael
Brooks IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS

1 I, Michael Brooks, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Capacitors Antitrust Litigation*, MDL No. 3:17-md-
5 02801-JD, Case No. 3:14-cv-03264-JD, filed in the United States District Court for the Northern
6 District of California. I submit this Declaration on behalf of myself and the classes in support of
7 Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards in
8 connection with the proposed settlements with Elna Corporation, Ltd. and Elna America, Inc. ("Elna"),
9 Matsuo Electric Corporation, Ltd. ("Matsuo"), Nichicon Corporation and Nichicon America
10 Corporation ("Nichicon"), and Panasonic Corporation ("Panasonic").

11 3. To pursue this matter effectively, I hired lawyers with extensive experience litigating
12 antitrust class actions. Prior to serving as a class representative, I was not asked to condition, nor did
13 I condition, my participation upon receiving a service award. Additionally, I was not asked to
14 condition, nor did I condition, my approval of any of the proposed settlements upon the promise or
15 expectation of receiving a service award.

16 4. As a class representative, I understand that it is my responsibility to be informed about
17 the work performed by my attorneys in the above-captioned litigation ("Action") and make my own
18 judgment about the fairness of any settlement proposed by the attorneys.

19 5. I also understand that in evaluating the fairness of the settlements, I am required to
20 consider the interests of all class members as well as my own.

21 6. Over the past 4 years, I have diligently performed my duties as a Class Representative
22 to assist Class Counsel in prosecuting this Action, investing significant time and effort to fulfill my
23 role. To that end, I have read the complaints filed, including the operative complaint on file, and
24 generally understand the nature of the claims asserted as well as the bases for them. Throughout this
25 Action, I have remained informed about the status of the litigation by communicating with my
26 attorneys about litigation strategies, reviewing periodic updates from Class Counsel, and becoming
27 apprised of key case documents. Since the outset of the Action, I have also diligently retained all
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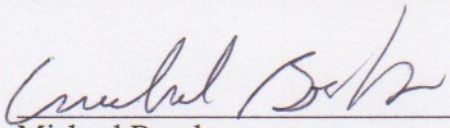
1 papers or electronic information that could be relevant to the litigation and provided these to my
2 attorneys.

3 7. Throughout the Action, I have also assisted in responding to discovery. This included
4 reviewing discovery requests from Defendants, discussing them with Class Counsel, reviewing
5 proposed responses, making any corrections, and signing off on the responses. I also spent a
6 significant amount of time locating purchase receipts and the other documents requested by the
7 Defendants in this Action.

8 8. I have also contributed to the discovery process by preparing and sitting for a
9 deposition. In total, my deposition lasted 2 hours and 52 minutes of record time, where I was
10 questioned by counsel in this Action. To ensure the accuracy of my transcript, I spent 1.25 hours
11 reviewing it for errors.

12 9. In total, I estimate that I have spent approximately 38 hours performing all the above-
13 described duties on behalf of the classes over the past 4 years. My attorneys have not made any
14 promises regarding compensation for my service, and I willingly agreed to participate in this Action
15 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
16 helped to make the settlements possible and therefore ask that the Court approve my service award
17 in the amount of \$5,000. I believe such an award is reasonable considering the assistance provided
18 and poses no risk of undermining my ability to adequately represent the Classes.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct. Executed October 31, 2019, in San Jose, California.

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22 
23 Michael Brooks