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7 *Interim Co-Lead Counsel for Indirect Purchaser Plaintiffs*

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 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN FRANCISCO DIVISION**
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 16 IN RE: CAPACITORS ANTITRUST
 LITIGATION

MASTER FILE NO. 14-cv-03264-JD

17 This Document Relates to:
 18 ALL INDIRECT PURCHASER ACTIONS

**SUPPLEMENTAL DECLARATION OF
 STEVEN N. WILLIAMS IN SUPPORT
 OF INDIRECT PURCHASER
 PLAINTIFFS' MOTION FOR
 PRELIMINARY APPROVAL OF CLASS
 ACTION SETTLEMENT WITH
 DEFENDANTS NEC TOKIN, NITSUKO,
 AND OKAYA**

Date: November 10, 2016
Time: 10:00 a.m.
Place: Courtroom 11, 19th Floor

1 I, Steven N. Williams, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and
3 admitted to practice in this Court and the courts of the State of California. I am a partner with
4 Cotchett, Pitre & McCarthy, LLP (“**CPM**”), and Interim Co-Lead Counsel for Indirect Purchaser
5 Plaintiffs (“**IPPs**”). The matters described are based on my personal knowledge, and if called as
6 a witness, I could and would testify competently thereto. I make this declaration pursuant to 28
7 U.S.C. § 1746.

8 2. I make this supplemental declaration in support of IPPs’ motion for preliminary
9 approval of class action settlement with Defendants NEC TOKIN Corp./NEC TOKIN America
10 Inc. (collectively, “**NEC TOKIN**”), Nitsuko Electronics Corporation (“**Nitsuko**”), and Okaya
11 Electric Industries Co, Ltd. (“**Okaya**”) (collectively, the “**Settlements**” or the “**Settling**
12 **Defendants**”).

13 3. Attached hereto as Exhibit 1 is a true and correct copy of a draft short form notice
14 contemplating that the claims process for class members is deferred until there are additional
15 recoveries.

16 4. Attached hereto as Exhibit 2 is a true and correct copy of a draft short form notice
17 contemplating that the claims process will begin upon final approval of the Settlements and the
18 conclusion of any appeals concerning the Settlements.

19 5. Attached hereto as Exhibit 3 is a true and correct copy of a draft long form notice
20 contemplating that the claims process for class members is deferred until there are additional
21 recoveries.

22 6. Attached hereto as Exhibit 4 is a true and correct copy of a draft long form notice
23 contemplating that the claims process for class members will begin upon final approval of the
24 Settlements and the conclusion of any appeals concerning the Settlements.

25 7. IPPs have subpoenaed non-party capacitor distributors who sell to customers in the
26 United States. IPPs believe that the distributors who responded to the subpoenas that were served
27 represent approximately 90% of distributor sales of capacitors in the United States during the
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1 class period. IPPs propose using information derived from these subpoenas in order to provide
2 direct mail notice as a component of the proposed notice program.

3 Executed on November 4, 2016 in New York, New York.

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5 /s/ Steven N. Williams
6 Steven N. Williams
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