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*Class Counsel for Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE: CAPACITORS ANTITRUST  
LITIGATION**

**MASTER FILE NO. 14-cv-03264-JD**

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

**DECLARATION OF DANIEL S.  
ROBINSON IN SUPPORT OF CLASS  
COUNSEL’S APPLICATION FOR  
ATTORNEYS’ FEES AND  
REIMBURSEMENT OF EXPENSES  
SUBMITTED ON BEHALF OF  
ROBINSON CALCAGNIE, INC.**

**Date: July 6, 2017  
Time: 10:00 a.m.  
Place: Courtroom 11, 19<sup>th</sup> Floor**

Judge: Hon. James Donato

I, Daniel S. Robinson, declare and state as follows:

1. I am a Partner of Robinson Calcagnie, Inc., 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.

1           2.       I have reviewed the Court’s October 31, 2014 Order Appointing Interim Lead Class  
2 Counsel (Dkt. 319) (“Order”), including in particular the Order’s provisions regarding fees, costs  
3 and expenses. The Firm has adhered to those provisions.

4           3.       During the pendency of the litigation, Robinson Calcagnie, Inc., acted as class counsel  
5 to IPPs. Robinson Calcagnie, Inc. has prosecuted this litigation solely on a contingent-fee basis, and  
6 has been at risk that it would not receive any compensation for prosecuting claims against the  
7 defendants. While Robinson Calcagnie, Inc. devoted its time and resources to this matter, it has  
8 foregone other legal work for which it would have been compensated.

9           4.       During the course of this litigation, Robinson Calcagnie, Inc. has been involved in the  
10 following activities on behalf of IPPs at the request and under the direction of Lead Counsel:  
11 Robinson Calcagnie, Inc. provided a supportive role to leadership on limited issues including, but  
12 not limited to, leadership structure, the consolidated complaint, the opposition to motion to dismiss,  
13 the second amended complaint and responses to written discovery. Robinson Calcagnie, Inc. assisted  
14 in drafting and revising IPP’s Opposition to Motion to Dismiss, IPP’s Second Amended Complaint  
15 and response to Defendant’s first set of interrogatories and requests for production.

16           5.       Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at  
17 historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time  
18 spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours  
19 spent by Robinson Calcagnie, Inc. during this period of time was 82.50, with a corresponding  
20 historical lodestar of \$37,150.00. This summary was prepared from contemporaneous, daily time  
21 records regularly prepared and maintained by Robinson Calcagnie, Inc. The lodestar amount  
22 reflected in Exhibit A is for work assigned by Lead Counsel, and was performed by professional  
23 staff at my law firm for the benefit of the IPP Class.

24           6.       All of the services performed by Robinson Calcagnie, Inc. in connection with this  
25 litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary  
26 duplication of services for which Robinson Calcagnie, Inc. now seeks compensation. The lodestar  
27 calculations exclude time spent reading or reviewing work prepared by others or other information  
28 relating to the case unless related to preparation for or work on a matter specifically assigned to

1 Robinson Calcagnie, Inc. by Lead Counsel. The hourly rates for the attorneys and professional  
2 support staff in my firm included in Exhibit A are the usual and customary hourly rates charged by  
3 Robinson Calcagnie, Inc.

4 7. Robinson Calcagnie, Inc. has expended a total of \$100,000.00 in unreimbursed costs  
5 and expenses in connection with the prosecution of this litigation from November 1, 2014 through  
6 September 30, 2016. These costs and expenses are broken down in the chart attached hereto as  
7 **Exhibit B**. They were incurred on behalf of IPPs by Robinson Calcagnie, Inc. on a contingent basis  
8 and have not been reimbursed. The expenses incurred in this action are reflected on the books and  
9 records of my firm. These books and records are prepared from expense vouchers, check records and  
10 other source materials and represent an accurate recordation of the expenses incurred. Expense  
11 documentation has been provided to Lead Counsel for review.

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

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

16 Executed this 12<sup>th</sup> day of May 2017 at Newport Beach, California.

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19 DANIEL S. ROBINSON

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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



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

**EXHIBIT B**

Robinson Calcagnie, Inc.

Expenses Incurred

November 1, 2014 – September 30, 2016

<b>EXPENSE CATEGORY</b>	<b>AMOUNT INCURRED</b>
Assessments	\$ 100,000.00
Court Costs / Filing Fees	\$ 0.00
Experts / Consultants	\$ 0.00
Federal Express / UPS / Ontrac	\$ 0.00
Postage / U.S. Mail	\$ 0.00
Service of Process	\$ 0.00
Messenger / Delivery	\$ 0.00
Hearing Transcripts	\$ 0.00
Investigation	\$ 0.00
Lexis / Westlaw	\$ 0.00
Photocopies – In House	\$ 0.00
Photocopies – Outside	\$ 0.00
Telephone / Telecopier	\$ 0.00
Travel – Transportation	\$ 0.00
Travel – Meals	\$ 0.00
<b>TOTAL:</b>	\$ 100,000.00