

ROBINS KAPLAN LLP

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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 HOLLIS SALZMAN
IN SUPPORT OF CLASS COUNSEL'S
APPLICATION FOR ATTORNEYS'
FEES AND REIMBURSEMENT OF
EXPENSES SUBMITTED ON BEHALF
OF ROBINS KAPLAN LLP**

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

Judge: Hon. James Donato

1 I, Hollis Salzman, declare and state as follows:

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

16 4. During the course of this litigation, Robins Kaplan LLP has been involved in the
17 following activities on behalf of IPPs at the request and under the direction of IPP Lead Counsel:
18 document review, including foreign language review, deposition preparation and the taking of
19 depositions in Asia, drafting third party declarations.

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 Robins Kaplan LLP during this period of time was 2,922.2, with a corresponding historical lodestar
23 of \$1,087,556.00. This summary was prepared from contemporaneous, daily time records regularly
24 prepared and maintained by Robins Kaplan LLP. The lodestar amount reflected in Exhibit A is for
25 work assigned by Lead Counsel, and was performed by professional staff at my law firm for the
26 benefit of the IPP Class during the aforementioned time period.

27 6. All of the services performed by Robins Kaplan LLP 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 Robins Kaplan LLP 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 Robins Kaplan LLP by Lead Counsel. The hourly rates for the attorneys and professional support
5 staff in my firm included in Exhibit A are the usual and customary hourly rates charged by Robins
6 Kaplan LLP.

7 7. Robins Kaplan LLP has expended a total of \$90,581.73 in unreimbursed costs and
8 expenses in connection with the prosecution of this litigation from October 1, 2016 through March
9 31, 2018. These costs and expenses are broken down in the chart attached hereto as **Exhibit B**.
10 They were incurred on behalf of IPPs by Robins Kaplan LLP on a contingent basis and have not
11 been reimbursed. The expenses incurred in this action are reflected on the books and records of my
12 firm. These books and records are prepared from expense vouchers, check records and other source
13 materials and represent an accurate recordation of the expenses incurred. Expense documentation
14 has been provided to Lead Counsel for review.

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

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

20
21 Executed on July 18, 2018 at New York, NY.

22
23 /s/Hollis Salzman
HOLLIS SALZMAN

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

ROBINS KAPLAN LLP

Hours Reported and Lodestar on a Historical Basis

October 1, 2016 – March 31, 2018

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
Hollis Salzman	P	0.1	\$890	\$89.00
Kellie Lerner	P	0.3	\$780	\$234.00
Aaron Sheanin	OC	8.4	\$795	\$6,678.00
Jill S. Casselman	A	320.3	\$500	\$160,150.00
Jill S. Casselman	A	64.1	\$550	\$35,255.00
Kate Iwanami	A	2,529.0	\$350	\$885,150.00
Grand Total:		2,922.2		\$1,087,556.00

EXHIBIT B

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

ROBINS KAPLAN LLP

Expenses Incurred

October 1, 2016 – March 31, 2018

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$75,000.00
Court Costs / Filing Fees	\$0.00
Experts / Consultants	\$0.00
Federal Express / UPS / Ontrac	\$390.29
Postage / U.S. Mail	\$0.00
Service of Process	\$0.00
Messenger / Delivery	\$0.00
Hearing Transcripts	\$0.00
Investigation	\$0.00
Lexis / Westlaw	\$44.90
Photocopies – In House	\$553.50
Photocopies – Outside	\$0.00
Telephone / Telecopier	\$0.00
Travel – Transportation	\$7,522.37
Travel - Hotels	\$5,983.22
Travel – Meals	\$1,087.45
TOTAL:	\$90,581.73