

1 Guido Saveri (22349)
R. Alexander Saveri (173102)
2 Cadio Zirpoli (179108)
3 **SAVERI & SAVERI, INC.**
706 Sansome Street
4 San Francisco, California 94111
Telephone: (415) 217-6810
5 Facsimile: (415) 217-6813

6 *Chairman of the Executive Committee*
7 *for the Direct Purchaser Plaintiffs*

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

12
13 IN RE: OPTICAL DISK DRIVE
14 ANTITRUST LITIGATION

Case No. 3:10-md-2143-RS
MDL No. 2143

15
16 This Document Relates to:
17 ALL DIRECT PURCHASER CLASS
18 ACTIONS

**DECLARATION OF WILLIAM H.
LONDON IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
INCENTIVE AWARDS**

19
20
21
22
23
24
25
26
27
28

1 I, William H. London, declare and state as follows:

2 1. I am a Partner of the law firm of Freed Kanner London & Millen LLC ("FKLM").
3 I submit this declaration in support of Direct Purchaser Plaintiffs ("DPP") joint application for an
4 award of attorneys' fees in connection with the services rendered in this litigation. I make this
5 Declaration based on my own personal knowledge, and if called as a witness, I could and would
6 competently testify to the matters stated herein.

7 2. My firm has served as counsel for the Direct Purchaser Class ("Class") throughout
8 the course of this litigation. The background and experience of FKLM and its attorneys are
9 summarized in the *curriculum vitae* attached hereto as Exhibit 1.

10 3. FKLM has prosecuted this litigation solely on a contingent-fee basis, and has been
11 at risk that it would not receive any compensation for prosecuting claims against the Defendants.
12 While FKLM devoted its time and resources to this matter, it has foregone other legal work for
13 which it would have been compensated.

14 4. During the pendency of the litigation, FKLM performed the following work at the
15 express direction of the Executive Committee: (1) Conferred extensively with the Executive
16 Committee in the formulation of overall litigation strategy; (2) helped manage and organize
17 Plaintiff's analysis of all evidence produced in the case, including the organization and structure of
18 the document review, the formulation of the document review protocol and the negotiation of the
19 production format to be used by all producing parties; (3) prepared responsive pleadings in
20 connection with opposition to motions to dismiss; (4) reviewed, analyzed and coded evidence
21 produced by defendants; (5) served as liaison for all class representative depositions, which
22 included preparation of witnesses, scheduling of depositions, negotiation of related discovery
23 disputes and assistance in defense of depositions; and, (6) assisted the Executive Committee with
24 various discovery issues relating to Hitachi defendants.
25
26

27 5. Attached hereto as Exhibit 2 is my firm's total hours and lodestar, computed at
28

1 historical rates, for the period of May 7, 2010 through December 31, 2014. This period reflects
2 the time spent after the appointment of the Chairman of the Executive Committee for the DPPs
3 (the "Chairman") in this litigation. The total number of hours spent by FKLM during this period
4 of time was 2,161.7, with a corresponding lodestar of \$890,575.50. This summary was prepared
5 from contemporaneous, daily time records regularly prepared and maintained by my firm. The
6 lodestar amount reflected in Exhibit 2 is for work assigned by the Chairman, and was performed
7 by professional staff at my law firm for the benefit of the Class.

8 6. The hourly rates for the attorneys and professional support staff in my firm
9 included in Exhibit 2 are the usual and customary hourly rates charged by FKLM.

10 7. My firm has expended a total of \$7,979.98 in unreimbursed costs and expenses in
11 connection with the prosecution of this litigation. These costs and expenses are broken down in
12 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs
13 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
14 action are reflected on the books and records of my firm. These books and records are prepared
15 from expense vouchers, check records and other source materials and represent an accurate
16 recordation of the expenses incurred.

17 8. FKLM paid a total of \$50,000.00 in assessments for the joint prosecution of the
18 litigation against the Defendants.

19 9. I have reviewed the time and expenses reported by my firm in this case which are
20 included in this declaration, and I affirm that they are true and accurate.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct. Executed on this 24th day of February, 2015 at Los Angeles,
23 California.

24
25 *William H. London*
26 _____
27 WILLIAM H. LONDON
28

EXHIBIT 1



FREED KANNER LONDON & MILLEN **LLC**

2201 WAUKEGAN ROAD
SUITE 130
BANNOCKBURN, IL 60015
TELEPHONE (224) 632-4500
FACSIMILE (224) 632-4521

www.fklmlaw.com



FREED KANNER LONDON & MILLEN LLC

Freed Kanner London & Millen LLC ("FKLM") is one of the nation's premier plaintiffs' class action practices. The firm's attorneys are among the pioneers and leaders in the class action field, having played leadership roles in major antitrust, consumer fraud, securities, unlawful business practices and insurance fraud cases for decades.

FKLM was founded on January 1, 2007. The founding partners of FKLM, formerly principals and partners of Much Shelist Freed Denenberg Ament & Rubenstein, P.C., have successfully prosecuted class action cases for over 30 years. Moreover, FKLM attorneys have served in leadership positions (as lead counsel, co-lead counsel, members of steering and executive committees) in some of the largest class action cases in the United States, including the following:

➤ ***In re Brand Name Prescription Drugs Antitrust Litigation, MDL 997 (N.D. Ill.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing class action. Settlements totaling approximately \$715 million were recovered on behalf of the plaintiff class.

➤ ***In re Hydrogen Peroxide Antitrust Litigation, MDL 1682 (E.D. Pa.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing action against hydrogen peroxide producers. The case resulted in settlements of over \$97 million for the class. In approving the Plaintiffs' motion for an award of attorneys' fees and expenses, Judge Stewart Dalzell lauded co-lead counsel:

[t]he "skill and efficiency of the attorneys involved" is of a very high order indeed, and as we noted at the fairness hearing yesterday, we have been impressed that these attorneys have prosecuted this matter vigorously against seasoned opponents without needlessly distracting the Court with discovery disputes.

➤ ***In re High Fructose Corn Syrup Antitrust Litigation, MDL 1087 (C.D. Ill.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing class action against major manufacturers of high fructose corn syrup. The case was settled for \$531 million for the class. At



FREED KANNER LONDON & MILLEN LLP

the close of the hearing where counsel fees were approved, Judge Michael M. Mihm stated:

I've said many times during this litigation that you and the attorneys who represent the defendants here are as good as it gets. Very professional. At least in my presence or in my contacts with you, you've always been civil. You've always been cutting to the chase and not wasting my time or each other's time or adding to the cost of the litigation.

➤ ***In re Linerboard Antitrust Litigation, MDL 1261 (E.D. Pa.)***

FKLM attorneys served as co-lead counsel in this antitrust price-fixing case, which resulted in settlements of over \$200 million for the plaintiff class.

➤ ***In re Vitamins Antitrust Litigation, MDL 1285 (D.D.C.)***

FKLM attorneys served as co-chairs of discovery in this antitrust price-fixing action, which resulted in over \$1.3 billion in settlements.

➤ ***In re Dynamic Random Access Memory (DRAM) Antitrust Litigation, MDL 1486 (N.D. Cal.)***

FKLM attorneys served as co-chairs of discovery in this nationwide, antitrust price-fixing action, which resulted in settlements of over \$300 million for class members.

➤ ***In re Rubber Chemicals Antitrust Litigation, MDL 1648 (N.D. Cal.)***

FKLM attorneys served on the executive committee in this nationwide, antitrust price-fixing action, which resulted in settlements of over \$300 million for class members.

➤ ***In re Ethylene Propylene Diene Monomer (EPDM) Antitrust Litigation, MDL 1542 (D. Conn.)***

FKLM attorneys served as co-chairs of discovery in this nationwide antitrust price-fixing action, which has resulted in settlements of over \$87 million for class members.

➤ ***In re Static Random Access Memory (SRAM) Antitrust Litigation, MDL 1819 (N.D. Cal.)***

FKLM was a member of the executive committee representing direct purchaser plaintiffs in this antitrust price-fixing case which resulted in settlements exceeding \$76 million.



FREED KANNER LONDON & MILLEN LLP

➤ ***Schagrin Gas Co. v. BP Products North America, et al., No. 1:06-cv-3621 (N.D. Ill.)***

FKLM was appointed co-lead counsel on behalf of direct purchaser plaintiffs in this nationwide class action involving monopolization claims under Section 2 of the Sherman Act. The case resulted in a settlement of over \$50 million.

➤ ***In re Urethane Chemicals Antitrust Litigation, MDL 1616 (D. Kan.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing action. The case resulted in settlements of \$33 million for the class.

➤ ***In re Flat Glass Antitrust Litigation (No. II), MDL 1942 (W.D. Pa.)***

FKLM served as co-lead counsel on behalf of direct purchaser plaintiffs of construction flat glass in this nationwide, antitrust price-fixing case. The case resulted in settlements exceeding \$22 million.

➤ ***In re Aftermarket Filters Antitrust Litigation, MDL 1957 (N.D. Ill.)***

FKLM served as interim co-lead counsel on behalf of direct purchasers of replacement automobile air and oil filters in this nationwide, antitrust price-fixing case. The case resulted in settlements of nearly \$18 million.

➤ ***In re Methyl Methacrylate (MMA) Antitrust Litigation, MDL 1768 (E.D. Pa.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing action against producers of methyl methacrylate and polymethyl methacrylate. The case resulted in a settlement of over \$15 million for the class.

➤ ***In re Waste Management, Inc. Securities Litigation, Master File 97-CV-7709 (N.D. Ill.)***

FKLM attorneys were actively involved in litigating the case and served as liaison counsel. A settlement for the plaintiff class of \$220 million was obtained.



FREED KANNER LONDON & MILLEN LLP

➤ ***In re Infant Formula Antitrust Litigation, MDL 878 (N.D. Fla.)***

FKLM attorneys were appointed co-lead counsel in this antitrust price-fixing class action against the major manufacturers of infant formula. The case settled for over \$125 million.

➤ ***In re Chubb Drought Insurance Litigation, MDL 782 (S.D. Ohio)***

FKLM attorneys were co-lead counsel in this class action filed on behalf of farmers who purchased drought insurance that Chubb refused to honor. The settlement exceeded \$110 million and was achieved in less than 9 months. This sum, together with \$8 million recovered at trial against Chubb's general agent, resulted in complete recovery for the affected farmers.

➤ ***In re Ocean Shipping Antitrust Litigation, MDL 395 (S.D.N.Y.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing class action, which resulted in a \$79 million recovery for thousands of U.S. and European shippers. Distributions were made to claimants in the United States and throughout a number of European countries.

➤ ***In re Isostatic Graphite Antitrust Litigation, Master File 00-CV-1857 (E.D. Pa.)***

FKLM attorneys were appointed co-lead counsel in this antitrust price-fixing class action. The case resulted in combined settlements of over \$11 million for the class.

➤ ***Blinder Robinson Securities Litigation (E.D. Pa.)***

FKLM attorneys were members of the Steering Committee in this securities fraud action in which an injunction was obtained preventing a transfer of assets; judgment of \$71 million was later entered.

➤ ***In re Carbon Dioxide Antitrust Litigation, MDL 940 (M.D. Fla.)***

FKLM attorneys were co-lead counsel in this antitrust price-fixing class action in which the plaintiff class recovered \$53 million and achieved significant therapeutic relief for the class.



FREED KANNER LONDON & MILLEN LLP

➤ ***In re Drill Bits Antitrust Litigation, CA No. H-91-627 (S.D. Tex.)***

FKLM attorneys were members of the Steering Committee in this antitrust price-fixing class action and were instrumental in achieving a settlement for the class in excess of \$52 million.

➤ ***In re Industrial Gas Antitrust Litigation, CA No. 80 C. 3479 (N.D. Ill.)***

FKLM attorneys were members of the executive committee in this antitrust price-fixing class action, which ultimately recovered more than \$50 million dollars for the class. The settlement included assignable purchase certificates, which the court found increased the competitive value of the settlement.

➤ ***In re Morrison Knudson Securities Litigation, CA No. 94-CV-3345 (D. Idaho)***

FKLM attorneys were co-lead counsel in this securities class action where the plaintiff class received \$43 million and approximately 3 million shares of Morrison Knudson common stock in settlement of their claims.

➤ ***In re M-L Lee Acquisition Fund Securities Litigation (D. Del.)***

FKLM attorneys served as co-lead counsel in this securities class action case against a syndicate of partnerships and its general partners, involving Merrill Lynch and its affiliates, and a leveraged buy-out specialty firm overseen by Thomas H. Lee. The case resulted in a \$33 million settlement on behalf of the limited partners.

➤ ***In re Public Service Company of New Mexico (S.D. Cal.)***

FKLM attorneys were lead counsel in this derivative action and obtained \$33 million dollars in a joint settlement with class plaintiffs in a related securities fraud class action. Judge Harry R. McCue, District Court Judge for the Southern District of California stated:

The petitioners in this case are members of respected law firms which specialize in class action litigation. These attorneys brought considerable legal talents together, and were able to achieve the



FREED KANNER LONDON & MILLEN LLP

successful completion of this litigation. They are entitled to fair and reasonable compensation.

➤ ***Piggly Wiggly Antitrust Litigation (E.D. Tex.)***

FKLM attorneys were co-lead counsel in this statewide (Texas) antitrust price-fixing action, which resulted in total settlements of approximately \$32 million for class members.

➤ ***In re Records and Tapes Antitrust Litigation (N.D. Ill.)***

FKLM attorneys were members of the executive committee in this antitrust price-fixing class action. The class recovered \$26 million dollars in settlement in cash and assignable purchase certificates.

➤ ***Kaufman v. Motorola, Inc. (N.D. Ill.)***

FKLM attorneys were actively involved in litigating the case and served as liaison counsel. A settlement of \$25 million was obtained for the plaintiff class.

➤ ***In re Unisys Securities Litigation, CA No. 99-5333 (E.D. Pa.)***

FKLM attorneys were members of the executive committee in this derivative action. Plaintiffs recovered \$20 million for corporation.

➤ ***Koch Gathering Systems, Inc. Oil Spill Litigation (Dist. Ct. of Nueces County, Tex.)***

FKLM attorneys were co-lead counsel in this case concerning a marine oil spill in which a class consisting of commercial fisherman and shrimpers recovered over \$10 million.

CURRENT CASES

FKLM attorneys are presently involved in the following cases, which are in varying stages of litigation

➤ ***In re Lithium Ion Batteries Antitrust Litigation, MDL No. 2420 (N.D. Cal.)***



FREED KANNER LONDON & MILLEN LLP

FKLM was appointed as a member of the Direct Purchaser Plaintiff Direct Purchaser Plaintiffs' Steering Committee in this case on behalf of direct purchasers of Lithium-Ion Battery products in this nationwide price fixing case.

➤ ***In re Automotive Parts Antitrust Litigation, MDL 2311 (E.D. Mich.)***

FKLM is acting as interim co-lead counsel on behalf of direct purchasers of automotive parts in six concurrently active nationwide, antitrust price-fixing cases.

➤ ***Kleen Products, Inc. et al. v. Packaging Corp. of America, et al., 10-CV-5711 (N.D. Ill.)***

FKLM is acting as interim co-lead counsel on behalf of direct purchasers of containerboard and related products in this nationwide, antitrust price-fixing case.

➤ ***In re Rail Freight Fuel Surcharge Antitrust Litigation, MDL 1869 (DC)***

FKLM is the co-chair of the Executive Committee in this case on behalf of direct purchasers of rail freight services who paid fuel surcharges in this nationwide, antitrust price-fixing case.

➤ ***Standard Iron Works v. ArcelorMittal et al., 08-CV-5214 (N.D. Ill.)***

FKLM was appointed as interim liaison counsel on behalf of direct purchasers of steel in this nationwide supply manipulation and price-fixing case.

➤ ***In re Blood Reagents Antitrust Litigation, MDL 2081 (E.D. Pa.)***

FKLM is a member of the Executive Committee in this nationwide antitrust class action brought on behalf of direct purchasers of blood reagents.

➤ ***In re TFT-LCD (Flat Panel) Antitrust Litigation, MDL 1827 (N.D. Cal.)***

FKLM attorneys have worked closely with lead counsel on a variety of discovery matters on behalf of direct purchasers of TFT-LCD flat panels in this nationwide price-fixing case. Settlements to date in this case total \$473 million.



FREED KANNER LONDON & MILLEN LLP

➤ ***In re NCAA Student-Athlete Name & Likeness Licensing Litigation, 4:09-CV-1967 (N.D. Cal.)***

FKLM attorneys are overseeing a variety of critical discovery matters in this antitrust case brought on behalf of former collegiate athletes.

➤ ***In re Fresh and Process Potatoes Antitrust Litigation, MDL 2186 (D. Idaho)***

FKLM attorneys worked closely with lead counsel in drafting the consolidated complaint and successfully opposing a motion to dismiss in this nationwide antitrust class action brought on behalf of direct purchasers of fresh and process potatoes.

➤ ***In re Processed Egg Products Antitrust Litigation, MDL 2002 (E.D. Pa.)***

FKLM attorneys worked closely with lead counsel in drafting the original complaint and successfully opposing a motion to dismiss in this nationwide antitrust class action brought on behalf of direct purchasers of eggs and egg products.

➤ ***In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL 1917 (N.D. Cal.)***

FKLM serves as Chair of Discovery and has worked closely with lead counsel to manage a variety of top level matters, including negotiating ESI issues and taking key depositions in this nationwide price-fixing class action with over \$100 million in partial settlements.

➤ ***In re Optical Disk Drive (ODD) Antitrust Litigation, MDL 2143 (N.D. Cal.)***

FKLM is one of several firms assisting lead counsel with discovery and briefing in this nationwide price-fixing class action brought on behalf of direct purchasers of optical disk drives.

➤ ***In re Municipal Derivatives Antitrust Litigation, MDL 1940 (S.D.N.Y.)***

FKLM is overseeing discovery of a key defendant and working closely with lead counsel on a variety of other pre-trial matters in this nationwide class action brought on behalf of purchasers of municipal derivatives.



FREED KANNER LONDON & MILLEN LLP

➤ ***In re Plasma-Derivative Protein Therapies Antitrust Litigation, MDL 2109 (N.D. Ill.)***

FKLM attorneys are working closely with lead counsel on various discovery matters in this nationwide antitrust case brought on behalf of direct purchasers of blood plasma protein therapies.

➤ ***In re American Express Anti-Steering Rules Antitrust Litigation (No. II), MDL 2221 (E.D.N.Y.)***

FKLM is overseeing discovery of independent merchant (opt-out) plaintiffs in this nationwide antitrust case.

➤ ***In re Air Cargo Shipping Services Antitrust Litigation, MDL 1775 (E.D.N.Y.)***

FKLM attorneys were selected as co-chairs of discovery in this antitrust class action involving claims under Section 1 of the Sherman Act. Settlements to date in this case total nearly \$600 million.

➤ ***In re Intel Corp. Microprocessor Antitrust Litigation, MDL 1717 (D. Del.)***

FKLM attorneys are serving in a lead role in managing discovery from dozens of named plaintiffs in this pending nationwide antitrust action. Among other things, the firm has played a key role in overseeing document production and coordinating, managing and defending over 50 depositions of named plaintiffs.

* * *

Other large class action cases in which FKLM attorneys were involved in a leadership position include *In re Folding Cartons Antitrust Litigation*, *In re Plywood Antitrust Litigation*, *In re Standard Screws Antitrust Litigation*, *In re Cotton Yarn Antitrust Litigation*, *In re Glass Containers Antitrust Litigation*, *In re Aluminum Siding Antitrust Litigation*, *Rusty Jones Warranty Litigation*, *NPA*



FREED KANNER LONDON & MILLEN LLP

Securities Litigation, In re Chlor-alkali and Caustic Soda Antitrust Litigation, and In re Potash Antitrust Litigation.

In addition, FKLM frequently serves as local counsel for a variety of cases, working closely with law firms located outside of Illinois. Recent examples include *North Miami General Employees Retirement Fund et al. v. Parkinson et al.*, Case No. 1:10-cv-06514 (N.D. Ill.) (pending), *Marvin H. Maurras Revocable Trust v. Bronfman Jr. et al.*, Case No. 1:12-cv-03395 (N.D. Ill.) (pending), and *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Motorola, Inc. et al.*, Case No. 1:10-cv-00427 (N.D. Ill.) (settled), all securities fraud actions where FKLM was appointed as liaison counsel.

ATTORNEY PROFILES

Michael J. Freed

After leaving the Department of Justice Antitrust Division, Mr. Freed has engaged in private antitrust class action litigation for 50 years. He has served as co-lead counsel in many prominent antitrust and securities fraud class action cases. Presently, Mr. Freed is serving as co-lead counsel in *In re Containerboard Antitrust Litigation*. Prior antitrust class actions in which Mr. Freed served as co-lead counsel include *In re Aftermarket Filters Antitrust Litigation*, *In re Brand Name Prescription Drugs Antitrust Litigation*, *In re High Fructose Corn Syrup Antitrust Litigation*, *In re Linerboard Antitrust Litigation*, *In re Carbon Dioxide Antitrust Litigation*, *In re Infant Formula Antitrust Litigation*, and *In re Ocean Shipping Antitrust Litigation*. More than \$2 billion has been recovered for the plaintiff classes in cases in which Mr. Freed has served as co-lead counsel. Mr. Freed has been named an Illinois Super Lawyer by Chicago Magazine, an Illinois Leading Lawyer by the Leading Lawyer's Network, and one of the top plaintiffs' antitrust lawyers in Illinois by Chamber's International. In addition, he was honored in March 2007 by the Chicago Appleseed



FREED KANNER LONDON & MILLEN LLP

Fund for Justice for his exceptional pro bono efforts. Mr. Freed was formerly a trial and appellate attorney with the United States Department of Justice, Antitrust Division (Honors Program). He is a graduate of the University of Pennsylvania (B.S., 1959) and University of Chicago Law School (J.D., 1962).

Steven A. Kanner

Mr. Kanner has over 30 years' experience in complex antitrust litigation and previously led the class action practice at Much Shelist Freed. His experience includes investigation, discovery, trial and appeal of antitrust, securities and other complex cases. Mr. Kanner has been designated an Illinois Super Lawyer by *Chicago Magazine* for the past 5 years and is a frequent lecturer both domestically and internationally on antitrust and trade regulation. With respect to antitrust matters, Mr. Kanner has been involved in a leadership capacity in many of the cases described above. Cases in which Mr. Kanner is currently serving as co-lead counsel or interim co-lead counsel include *In re Automotive Parts Antitrust Litigation*, MDL 2311 (E.D. Mich.), (an international price fixing conspiracy of historic proportions which currently includes individual cases for Wire Harnesses, Instrument Panel Clusters, Fuel Senders, Heater Control Panels, Occupant Safety Systems, Ball Bearings, Air Conditioning Systems, Windshield Wiper Systems, Starters, Alternators, Windshield Washer Systems) , *In re Containerboard Antitrust Litigation* 2010-CV-5711 (N.D. IL), *In re Vehicle Carrier Antitrust Litigation*, MDL 2471 N.D. NJ) (Mr. Kanner is also Co-Chair of the Executive Committee in *In re Rail Freight Fuel Surcharge Antitrust Litigation* MDL 1869 (DC). A 1979 graduate of DePaul University Law School, Mr. Kanner is admitted to the Bars of Illinois, the Northern District of Illinois (member of the trial bar), the United States Court of Appeals (Second, Third, Fourth, Fifth, Seventh and Tenth Circuits) and the United States Supreme Court.



He is also a member of the Chicago Bar Association (Committees on Litigation and Antitrust Law), the Illinois State Association (Sections on Antitrust Law and Litigation), the American Bar Association (Sections on Antitrust Law and Litigation), the Illinois Trial Lawyers Association, and the Decalogue Society where he previously served on the Editorial Board of the Society's Law Journal. Prior to entering private practice, Mr. Kanner was employed by the Federal Trade Commission as a consumer affairs specialist.

William H. London

Mr. London has been litigating class action cases for over 25 years. He served as trial counsel for the plaintiff class in *In re High Pressure Laminates Antitrust Litigation*, a case that was tried before a jury in the Southern District of New York. He was actively involved in several cases in which FKLML was serving in a leadership capacity, including *In re Flat Glass Antitrust Litigation (No. II)*, MDL No. 1942 (W.D. Pa.); *In re Static Random Access Memory (SRAM) Antitrust Litigation*, MDL No. 1819 (N.D.Cal); and *In re Hydrogen Peroxide Antitrust Litigation*, MDL 1682 (E.D. Pa.). Mr. London presently has significant involvement in *In re Automotive Parts Antitrust Litigation*, MDL 2311 (E.D. Mich.) and *In re Optical Disk Drive Products Antitrust Litigation*, No. 3:10-md-2143 (N.D. Cal.).

Mr. London graduated *Magna Cum Laude* from Syracuse University in 1984 and received his law degree in 1987 from IIT Chicago-Kent College of Law. In 1987, he was admitted to the Illinois Bar and the Federal Bar; and in 1988, he was admitted to practice before the United States Court of Appeals for the Seventh Circuit. Mr. London is a member of the American Bar Association and is a past-Chairman of the Chicago Bar Association Class Litigation Committee. He was formerly an Assistant Attorney General for the State of Illinois, during which time he argued cases



FREED KANNER LONDON & MILLEN LLP

in the United States Court of Appeals for the Seventh Circuit and the Illinois Supreme Court. Since 1990, Mr. London has concentrated on complex and commercial litigation, with an emphasis on class action litigation involving antitrust claims. Mr. London practiced with Much Shelist Freed from March 1993 through December 31, 2006.

Douglas A. Millen

Mr. Millen devotes his practice to prosecuting direct purchaser, price-fixing class actions and has played a key role in many of the most successful price-fixing cases in the United States. Most recently in the Northern District of California, Judge Yvonne Gonzalez Rogers appointed Mr. Millen to the Direct Purchaser Plaintiffs' Steering Committee in *In re Lithium Ion Batteries Antitrust Litigation*, MDL No. 2420 (N.D. Cal.). He has extensive experience litigating complex commercial matters, with an emphasis on cases involving antitrust, consumer protection, securities and contract law claims. Mr. Millen also has substantial experience in electronic discovery matters and the leveraging of technology to achieve effective and efficient client advocacy. He formerly chaired the Technology Committee at Much Shelist Freed and has handled many complicated electronic discovery issues. Mr. Millen has played a prominent role in many of the largest antitrust cases in recent history – including *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, MDL 1486 (N.D. Cal.), *In re Vitamins Antitrust Litigation*, MDL 1285 (D.D.C.), and *In re Rubber Chemicals Antitrust Litigation*, MDL 1648 (N.D. Cal.) – and his efforts have assisted in the recovery of billions of dollars for class members. Among other cases, Mr. Millen is presently involved in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL 1917 (N.D. Cal.), *In re American Express Anti-Steering Rules Antitrust Litigation (No. II)*, MDL 2221 (E.D.N.Y.), and *In re Rail Freight Fuel Surcharge Antitrust Litigation*, MDL 1869 (D.D.C.) He has also provided antitrust compliance



FREED KANNER LONDON & MILLEN LLC

consultation for large, multi-national companies. Mr. Millen is a graduate of the University of Michigan (B.G.S., 1991) and University of Illinois College of Law (J.D. *magna cum laude*, 1994). In 1994, he was admitted to the New York and Connecticut State Bars; and in 1995 he was admitted to the Illinois State Bar. He is also admitted to practice in the Northern and Southern Districts of Illinois. Mr. Millen is a member of the American Bar Association, Antitrust Section and the Chicago Bar Association. Prior to founding FKLM, Mr. Millen was a partner at Much Shelist Freed, where he practiced with the class action group from November 1995 through December 31, 2006.

Michael E. Moskowitz

Michael E. Moskowitz is a partner at Freed Kanner London & Millen LLC and has been involved in trial and appellate litigation for more than 15 years. Since 2000, he has concentrated on complex commercial litigation, with a primary emphasis on class action litigation involving antitrust, securities fraud, and consumer fraud claims. Mr. Moskowitz previously played a key role in the class action practice of Much Shelist Freed. He is significantly involved in several pending antitrust class actions, *In re Automotive Parts Antitrust Litigation*, MDL 2311 (E.D. Mich.), and *In re Vehicle Carrier Services Antitrust Litigation*, MDL No. 2471. Mr. Moskowitz is also a member of The Sedona Conference's Working Group 1 (Electronic Document Retention and Production) and has spoken at The Sedona Conference's Midyear meeting and has co-written papers published by The Sedona Conference. Mr. Moskowitz is a graduate of Indiana University (B.A., 1993) and New York University School of Law (J.D., 1996).

Robert J. Wozniak

Robert J. Wozniak is a partner at Freed Kanner London & Millen LLC. Since 2001, Mr. Wozniak has been involved in complex commercial litigation, with a primary emphasis on antitrust



FREED KANNER LONDON & MILLEN LLC

and consumer class action cases. Prior to engaging in private law practice, Mr. Wozniak worked as a trial attorney for the United States Department of Justice, Antitrust Division (Honors Program). Mr. Wozniak was then employed by Cohen Milstein Hausfeld & Toll, a Washington, D.C. class action firm, before joining Much Shelist Freed in 2004. The complex antitrust class actions in which Mr. Wozniak has had significant involvement include: *Kleen Products, et al. v. International Paper, et al.* (N.D. Ill.); *In re NCAA Student-Athlete Names & Likeness Licensing Litigation* (N.D. Cal.); *In re Municipal Derivatives Antitrust Litigation* (S.D.N.Y.); *In re Flat Glass Antitrust Litigation (II)* (W.D. Pa.); *In re TFT-LCD (Flat Panel) Antitrust Litigation* (N.D. Cal.); *In re Static Random Access Memory (SRAM) Antitrust Litigation* (N.D. Cal.); *In re Hydrogen Peroxide Antitrust Litigation* (E.D. Pa.); *In re Intel Corp. Microprocessor Antitrust Litigation* (D. Del.); *In re Dynamic Random Access Memory (DRAM) Litigation* (N.D. Cal.); *In re Buspirone Antitrust Litigation* (S.D.N.Y.); and *In re Terazosin Hydrochloride Antitrust Litigation* (S.D. Fla.). Mr. Wozniak is a graduate of the University of Michigan (B.A., 1988), University of Minnesota (M.A., 1994), and Wayne State University Law School (J.D., 2000, *cum laude*, Order of the Coif). He has been admitted to practice law in Illinois, Michigan and the District of Columbia.

Donald L. Sawyer

Donald L. Sawyer is an associate attorney at Freed Kanner London & Millen LLC. He is a graduate of Emory University's Goizueta Business School, from which he received a Bachelor of Business Administration degree, concentrating his studies in Finance. In 2006, Mr. Sawyer graduated from The John Marshall Law School in Chicago, where he received his J.D. degree. While attending law school, Mr. Sawyer was a board member of The Corporate Law Association. He was admitted to the Illinois State Bar and U.S. District Court, Northern District of Illinois, in



FREED KANNER LONDON & MILLEN LLC

2006. Mr. Sawyer has been involved in complex commercial litigation since 2007, with a primary emphasis on antitrust class action cases involving territorial division, price fixing, and other anticompetitive practices. Additionally, he has significant involvement in complex electronic discovery matters. Mr. Sawyer has had significant involvement in the following cases: *In re Air Cargo Shipping Antitrust Litigation* (E.D.N.Y), *In re Cathode Ray Tube (CRT) Antitrust Litigation* (N.D. Cal.), and *Kleen Products, et al. v. Packaging Corp. of America, et al.* (N.D. Ill.).

Heather M. Bessinger

Heather M. Bessinger is an associate attorney at Freed Kanner London & Millen LLC. Ms. Bessinger received her Bachelor of Science degree from DePaul University, where she majored in Finance, and she received a Master in Business Administration degree from the University of Chicago Booth School of Business, concentrating in Finance, Economics, and Statistics. Ms. Bessinger graduated from Loyola University Chicago School of Law in 2009. While in law school, Ms. Bessinger was a judicial extern for the Honorable Blanche M. Manning of the District Court for the Northern District of Illinois, and she was a Teaching Assistant for both Legal Writing and Contracts. Ms. Bessinger is admitted to the Illinois and Wisconsin State Bars, U.S. District Courts for the Eastern and Western Districts of Wisconsin, and the Seventh Circuit Court of Appeals. After graduating law school, Ms. Bessinger worked for several years as an associate attorney at a large Milwaukee-based law firm, focusing her practice on commercial litigation. Ms. Bessinger concentrates her practice on complex and commercial litigation, with a primary emphasis in antitrust class action litigation involving price fixing and other anticompetitive practices.

EXHIBIT 2

EXHIBIT 2*In re Optical Disk Drive Antitrust Litigation*, Case No. 3:10-md-2143-RS**Freed Kanner London & Millen LLC**

Reported Hours and Lodestar

May 7, 2010 through December 31, 2014

TIME REPORT

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS			
William H. London (P)	1.50	\$560	\$840.00
William H. London (P)	7.00	\$570	\$3,990.00
William H. London (P)	.30	\$605	\$181.50
William H. London (P)	1.40	\$615	\$861.00
William H. London (P)	50.80	\$625	\$31,750.00
William H. London (P)	192.20	\$635	\$122,047.00
William H. London (P)	106.80	\$645	\$68,886.00
William H. London (P)	.70	\$660	\$462.00
Douglas A. Millen (P)	38.50	\$555	\$21,367.50
Douglas A. Millen (P)	10.30	\$565	\$5,819.50
Douglas A. Millen (P)	20.20	\$590	\$11,918.00
Douglas A. Millen (P)	7.60	\$605	\$4,598.00
Douglas A. Millen (P)	5.70	\$615	\$3,505.50
Douglas A. Millen (P)	3.20	\$625	\$2,000.00
Douglas A. Millen (P)	15.80	\$635	\$10,033.00
Douglas A. Millen (P)	.50	\$650	\$325.00
Michael E. Moskovitz (P)	23.00	\$350	\$8,050.00
Michael E. Moskovitz (P)	.70	\$515	\$360.50
Robert J. Wozniak (P)	65.90	\$350	\$23,065.00
Robert J. Wozniak (P)	29.70	\$475	\$14,107.50
Robert J. Wozniak (P)	31.20	\$515	\$16,068.00
Donald L. Sawyer (A)	.50	\$325	\$162.50
Donald L. Sawyer (A)	5.10	\$340	\$1,734.00
Donald L. Sawyer (A)	90.80	\$350	\$31,780.00
Michael L. Silverman (A)	6.00	\$295	\$1,770.00
Michael L. Silverman (A)	1.90	\$305	\$579.50
Michael L. Silverman (A)	30.80	\$325	\$10,010.00
Michael L. Silverman (A)	2.00	\$335	\$670.00
Michael L. Silverman (A)	550.70	\$350	\$192,745.00
Michael L. Silverman (A)	.50	\$395	\$197.50
Steve Nathan (OC)	857.60	\$350	\$300,160.00

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
NON-ATTORNEYS			
Marlene S. Khamoo (PL)	2.80	\$190	\$532.00
TOTAL:	2,161.70		\$890,575.50

(P) Partner
(OC) Of Counsel
(A) Associate
(PL) Paralegal
(LC) Law Clerk

EXHIBIT 3

EXHIBIT 3

In re Optical Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS
Freed Kanner London & Millen LLC
 Reported Unreimbursed Expenses Incurred on Behalf of Direct Purchaser Class
 May 7, 2010 through December 31, 2014

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	\$275.00
Experts/Consultants	
Federal Express	\$87.98
Transcripts (Hearing, Deposition, etc.)	
Computer Research	\$1,609.57
Messenger Delivery	
Photocopies – In House	\$249.40
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	\$431.81
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	\$5,326.22
TOTAL:	\$7,979.98