

1 Simon B. Paris  
2 **Saltz, Mongeluzzi, Barrett & Bendesky, PC**  
3 One Liberty Place  
4 1650 Market Street, 52<sup>nd</sup> Floor  
5 Philadelphia, PA 19103  
6 Telephone: (215) 496-8282  
7 Facsimile: (215) 496-0999

8 *Counsel for Plaintiff JLK Systems Group, Inc.*  
9 *and the Proposed Direct Purchaser Class*

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

13 IN RE:OPTICAL DISK DRIVEANTITRUST  
14 LITIGATION

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

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

**DECLARATION OF SIMON BAHNE  
PARIS IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES, REIMBURSEMENT  
OF EXPENSES, AND INCENTIVE  
AWARDS**

1 I, Simon B. Paris, declare and state as follows:

2 1. I am a Partner of the law firm of Saltz, Mongeluzzi, Barrett & Bendesky, PC. I  
3 submit this declaration in support of Direct Purchaser Plaintiffs' ("DPPs") joint application for an  
4 award of attorneys' fees, expenses, and incentive awards in connection with the services rendered  
5 in this litigation. I make this Declaration based on my own personal knowledge, and if called as a  
6 witness, I could and would competently testify to the matters stated herein.

7 2. My firm has served as counsel to JLK Systems Group, Inc. and as counsel for the  
8 Direct Purchaser Class ("Class") throughout the course of this litigation. My firm's curriculum  
9 vitae was previously submitted to the Court in connection with Direct Purchaser Plaintiffs' prior  
10 motion for an award of attorneys' fees, reimbursement of expenses and class representative  
11 incentive awards on March 16, 2015 (Prior Request for Attorneys' Fees"). (Dkt. No. 1535).

12 3. Saltz, Mongeluzzi, Barrett & Bendesky, PC, has prosecuted this litigation solely on  
13 a contingent-fee basis, and has been at risk that it would not receive any compensation for  
14 prosecuting claims against the Defendants. While Saltz, Mongeluzzi, Barrett & Bendesky, PC  
15 devoted its time and resources to this matter, it has foregone other legal work for which it would  
16 have been compensated.

17 4. During this period of the litigation, Saltz, Mongeluzzi, Barrett & Bendesky, PC  
18 performed the following work: continuously kept abreast of all developments in the litigation and  
19 communicated these developments to our client; reviewed the settlement agreements with our  
20 client; and communicated with lead counsel regarding the case's progress.

21 5. Attached hereto as Exhibit 1 is my firm's hours and lodestar, computed at historical  
22 rates, for the period of January 1, 2015 through November 3, 2015. This period does not reflect  
23 any time previously submitted to the Court in connection with the Prior Request for Attorneys'  
24 Fees in this litigation. The total number of hours spent by Saltz, Mongeluzzi, Barrett & Bendesky,  
25 PC during this period of time was 12.30, with a corresponding lodestar of \$7,539.50. This  
26 summary was prepared from contemporaneous, daily time records regularly prepared and  
27 maintained by my firm. The lodestar amount reflected in Exhibit 1 is for work assigned by the

1 Chairman of the Executive Committee, and was performed by professional staff at my law firm for  
2 the benefit of the Class.

3 6. The hourly rates for the attorneys in my firm included in Exhibit 1 are the usual and  
4 customary hourly rates charged by Saltz, Mongeluzzi, Barrett & Bendesky, PC.

5 7. My firm has expended a total of \$59.22 in unreimbursed costs and expenses in  
6 connection with the prosecution of this litigation from January 1, 2015 to the present. None of the  
7 costs reflected in Exhibit 2 have been previously submitted to the Court for reimbursement in  
8 connection with the Prior Request for Attorneys' Fees in this matter. These costs and expenses are  
9 broken down in the chart attached hereto as Exhibit 2. They were incurred on behalf of the Class  
10 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this  
11 action are reflected on the books and records of my firm. These books and records are prepared  
12 from expense vouchers, check records and other source materials and represent an accurate  
13 recordation of the expenses incurred.

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

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct. Executed on this 11th day of February, 2016 at Philadelphia,  
18 Pennsylvania.

19  
20   
21 SIMON BAHNE PARIS

# EXHIBIT 1

**EXHIBIT 1**

*In re Optical Disk Drive Antitrust Litigation*, Case No. 3:10-md-2143-RS  
**SALTZ, MONGELUZZI, BARRETT & BENDESKY, PC**  
 Reported Hours and Lodestar  
 January 1, 2015 through November 3, 2015

**TIME REPORT**

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS			
Simon Paris (P)	11.80	\$615	\$7,257.00
Patrick Howard (P)	.50	\$565	\$282.50
NON-ATTORNEYS			
<b>TOTAL:</b>	12.30		\$7,539.50

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

# EXHIBIT 2

**EXHIBIT 2**

*In re Optical Disk Drive Antitrust Litigation*, Case No. 3:10-md-2143-RS  
**SALTZ, MONGELUZZI, BARRETT & BENDESKY, PC**  
 Reported Unreimbursed Expenses Incurred on Behalf of Direct Purchaser Class  
 January 1, 2015 through November 3, 2015

**EXPENSE REPORT**

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Court Fees (filing, etc.)	
Experts/Consultants	
Federal Express	\$59.22
Transcripts (Hearing, Deposition, etc.)	
Computer Research	
Messenger Delivery	
Photocopies – In House	
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	
<b>TOTAL:</b>	\$59.22