

EXHIBIT J

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13 *Interim Co-Lead Counsel for Direct Purchaser Plaintiffs*

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE: LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION

Case No. 13-md-02420-YGR
MDL No. 2420

20 This Document Relates to:
21 ALL DIRECT PURCHASER CLASS
22 ACTIONS

**DECLARATION OF MICHAEL G.
MCLELLAN IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS MOTION
FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF
EXPENSES, AND INCENTIVE AWARDS**

1 I, Michael G. McLellan, declare and state as follows:

2 1. I am a Partner of the law firm of Finkelstein Thompson LLP. I submit this
3 declaration in support of Direct Purchaser Plaintiffs (“DPP”) application for an award of
4 attorneys’ fees and reimbursement of expenses in connection with the services rendered in this
5 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 James O’Neil and as counsel for the Direct
8 Purchaser Class (“Class”) throughout the course of this litigation. The background and experience
9 of Finkelstein Thompson LLP and its attorneys are summarized in the *curriculum vitae* attached
10 hereto as Exhibit 1.

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

15 4. During the pendency of the litigation, Finkelstein Thompson LLP performed the
16 following work: Coordinating discovery of named plaintiff James O’Neil, including identifying
17 responsive documents, assisting in defending deposition, and all other aspects of plaintiff
18 discovery; reviewing defendants’ document productions; reviewing plaintiff productions for
19 responsiveness and privilege.

20 5. Attached hereto as Exhibit 2 is my firm’s total hours and lodestar, computed at
21 historical rates, for the period of June 1, 2013 through August 31, 2017. This period reflects the
22 time spent after the appointment of Interim Co-Lead Counsel and Liaison Counsel for Direct
23 Purchased Plaintiffs (“DPP”) in this litigation. The total number of hours spent by Finkelstein
24 Thompson LLP during this period of time was 228.80, with a corresponding lodestar of
25 \$101,995.00. My firm’s lodestar figures are based on the firm’s historical billing rates which do
26 not include charges for expense items. Expense items are billed separately and such charges are
27 not duplicated in my firm’s billing rates. This summary was prepared from contemporaneous,

1 daily time records regularly prepared and maintained by my firm. The lodestar amount reflected in
2 Exhibit 2 is for work assigned by DPP Co-Lead Counsel, and was performed by professionals at
3 my law firm for the benefit of the Class.

4 6. Finkelstein Thompson LLP has reviewed the time and expense records that form
5 the basis of this declaration to correct any billing errors. In addition, my firm has removed all
6 time entries and expenses related to the following:

7 a. time spent reading or reviewing pleadings, ECF notices or other papers
8 unless a necessary part of performing a specific assignment from Co-Lead Counsel;

9 b. travel time unless the attorney or professional was actively engaged in
10 preparation or work in connection with a particular assignment made by Co-Lead Counsel which
11 necessitated travel;

12 c. billing for time connected with creating timekeeping records or for the time
13 of attorneys or staff expended in preparation of audited time records and expenses in support of
14 DPPs' application for an award of attorneys' fees and reimbursement of expenses.

15 7. The hourly rates for the attorneys and professional support staff in my firm
16 included in Exhibit 2 are the same as the regular rates charged for their services in non-contingent
17 matters and/or which have been accepted in other complex or class action litigation subject to the
18 hourly rate caps established by DPP Co-Lead Counsel, including:

19 a. the highest hourly rates for Attorneys at the highest Partner level is capped
20 at \$850 per hour;

21 b. the highest hourly rates for Attorneys at the Of-counsel/Special counsel
22 level for substantive work is capped at \$650 per hour, which excludes document review;

23 c. the highest hourly rates for Attorneys at the highest Associate level for
24 substantive work is capped at \$450 per hour, which excludes document review;

25 d. the highest hourly rates for Attorneys at the Associate level engaged in
26 English-language document review is capped at \$350 per hour; a cap of \$400 per hour is permitted
27 where the reviewer has special skill set, such as foreign language translation, and Lead Counsel

1 has approved that work performed; and

2 e. the highest hourly rates for Paralegals and investigators is capped at \$175
3 per hour.

4 8. My firm has expended a total of \$206.36 in unreimbursed costs and expenses in
5 connection with the prosecution of this litigation. These costs and expenses are broken down in
6 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs
7 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
8 action are reflected on the books and records of my firm. These books and records are prepared
9 from expense vouchers, check records and other source materials and represent an accurate
10 recordation of the expenses incurred.

11 9. Finkelstein Thompson LLP paid a total of \$15,000.00 in assessments for the joint
12 prosecution of the litigation against the Defendants.

13 10. My firm has carefully reviewed the time and expenses that comprise its reported
14 lodestar and out of pocket expenses and represents that such lodestar and expenses comply with all
15 material applicable terms of the May 21, 2013 letter from Co-Lead Counsel regarding Protocols
16 for Maintaining and Reporting Time and Expense as well as Modified Pretrial Order No. 1 with
17 Exhibit A (Dkt. No. 202, May 24, 2013).

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct. Executed on this 24th day of January, 2018 at Washington, District of
20 Columbia.

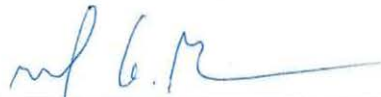
21 
22 _____
23 Michael G. McLellan

EXHIBIT 1



FIRM RESUME

2018

3201 New Mexico Avenue, NW, Suite 395 · Washington, DC 20016

100 Pine Street, Suite 1250 · San Francisco, CA 94111

FINKELSTEIN THOMPSON LLP

FINKELSTEIN THOMPSON LLP (“the firm”), is a complex litigation firm, with offices in Washington, DC and San Francisco, CA, focusing primarily on suits involving antitrust violations, fraud and crime in the banking, securities and commodities industries, and consumer fraud.

By concentrating exclusively on litigation, rather than a generalized transactional practice, the firm avoids the conflicts of interest, both actual and philosophical, that can arise from multi-faceted representation, and is able to offer the kind of hard-hitting approach that modern complex litigation demands. Since 1993, the firm has served in a leadership position in cases that have recovered many hundreds of millions of dollars for investors and consumers.

Because the outcome of litigation is often dependent on the strength of expert testimony, the firm has developed strong working relationships with nationally prominent outside consultants in the areas of securities, commodities, antitrust, banking, consumer fraud, marketing and economics.

HISTORY

The firm was founded in March 1977 by Burton H. Finkelstein and Douglas G. Thompson, Jr. The firm's offices are located in Washington, DC and in San Francisco, CA.

EXPERIENCE

The firm is involved in class action litigation in federal and state courts nationwide. It has developed a reputation for successful and thorough representation of class clients against many of the largest and most powerful companies in the country. As part of our efforts to serve our clients' interests in the most effective and efficient manner possible, the firm has established ongoing relationships with other class action law firms whose size, location or expertise complement our own. We are proud to have won judgments and negotiated settlements that have recovered an aggregate of over one billion dollars for class members.

Douglas G. Thompson, Jr., one of the founding and named partners of the firm, has prosecuted and defended complex civil and criminal matters for over forty years. The other partners and associates have extensive experience in a variety of complex litigation fields. The firm has practiced before the Securities and Exchange Commission, Commodity Futures Trading Commission, Federal Trade Commission, Federal Communications Commission, U.S. Copyright Office, New York Stock Exchange, Chicago Board of Trade, National Association of Securities Dealers, National Futures Association, Financial Industry Regulatory Authority and in various state and federal trial and appellate courts across the country, in civil and criminal enforcement matters and in private damage litigation. The firm has considerable expertise and experience in defending and prosecuting complex financial class action claims.

SECURITIES & COMMODITIES CLASS ACTION LITIGATION

Since its inception in 1977, the firm's securities litigation practice has extended across a wide range of shareholders' securities litigation, from accounting fraud, allegations of insider trading, proxy statement fights, and minority shareholder rights being violated, to cases alleging misstatements in prospectuses. The firm has litigated substantive federal issues under the Securities Act of 1933, the Securities Exchange Act of 1934, the Reform Act of 1995, and tender offers under the Williams Act, derivative suits under State and Federal law, and unfair business practices claims.

Our clients have included institutional investors, pension funds, high-net worth individuals and retail investors. While few class action securities suits go to trial, substantial skill and experience is required to investigate, prepare, and litigate the underlying claims to successful resolution. The firm enjoys a national reputation for high-quality and successful recoveries for our clients.

The firm also selectively prosecutes actions pursuant to the Commodity Exchange Act regarding market manipulations involving commodity futures and options. To date, the firm has enjoyed considerable success in these matters, which are recognized as some of the most difficult causes of action to successfully pursue.

SETTLED REPRESENTATIVE SECURITIES AND COMMODITIES CLASS ACTION CASES

1. In re Merrill Lynch & Co., Inc. Research Reports Litigation, MDL 1484 (S.D.N.Y.) – Executive Committee member; Lead Counsel in six of the underlying actions; \$125 million settlement achieved.
2. In re Natural Gas Commodity Litigation, No. 03cv6186 (S.D.N.Y.) – Co-Lead Counsel; over \$100 million achieved in settlements.
3. In re Dairy Farmers Of America, Inc. Cheese Antitrust Litigation, No. 09-cv-03690 (N.D. Ill.) – Allocation Counsel for Core Period Claims; achieved allocation of 92.5% of \$46 million settlement to Core Period Claimants.
4. PaineWebber Securities Litigation, No. 94cv8547 (S.D.N.Y.) – Executive Committee member; \$200 million settlement achieved.
5. Freeland v. Iridium World Communications, Ltd., No. 99cv1002 (D.D.C.) – Liaison Counsel and Executive Committee member; \$47.5 million settlement achieved.
6. Prudential Securities Litigation, MDL 1005 (S.D.N.Y.) – Executive Committee member & Co-Chair of Settlement Committee; \$150 million settlement achieved.
7. Kidder Peabody Securities Litigation, No. 94cv3954 (S.D.N.Y.) – Executive Committee member; \$19 million settlement achieved.

8. Rudolph vs. UT Starcom, et al, No. 3:07-CV-04578-SI (N.D.Ca.) – The firm serves as sole Lead Counsel in a securities fraud class action against UT Starcom and certain officers in connection alleged illegal backdating of executive stock options. \$9.5 million settlement achieved
9. Holly Glenn v. Polk Audio, Inc., No. 99cv4768 (Md. Cir. – Baltimore) – Co-lead Counsel; \$4.8 million settlement achieved (an increase of nearly 50% of shareholder buyout value).
10. Grecian v. Meade Instruments, Inc., No. 06cv908 (C.D. Cal.) – Sole Lead Counsel on behalf of shareholders claiming securities fraud violations related to alleged illegal backdating of executive stock options. Settlement achieved for \$3 million and corporate governance changes.

ANTITRUST CLASS ACTION LITIGATION

Federal and state antitrust laws are primarily concerned with protecting the economy and promoting competition between businesses by preventing (i) collusion among competitors that might result in restraints on competition in a given industry or market, and (ii) anti-competitive conduct by a particular entity who holds monopoly power in a given industry or market.

The firm is involved in several cases on behalf of individuals and businesses that have been injured by the anti-competitive behavior of other companies. These cases involve allegations such as market manipulation, monopolization, price-fixing, and predatory practices. Below is a sample of the cases in which we have been intensively involved:

SETTLED REPRESENTATIVE ANTITRUST CLASS ACTION CASES

1. In re Dynamic Random Access Memory (DRAM) Antitrust Litigation, No. M-02-1486 (N.D.Cal.) – Executive Committee member for indirect purchaser claims; settlement achieved for \$310 million (on appeal).
2. In re Relafen Antitrust Litigation, No. 01cv12239 (D. Mass.) – Executive Committee member in federal direct purchaser case, settlement achieved - \$175 million.
3. Heliotrope General, Inc. v. Sumitomo Corporation, et al., Master Case No. 701679 (Cal. Super. - San Diego) – Co-Lead Counsel; multiple settlements achieved totaling \$87.35 million.
4. In re Warfarin Sodium Antitrust Litigation, MDL 1232 (D. Del.) – Discovery Committee member and Co-lead Counsel in state case; settlement achieved in the companion national case - \$44.5 million.

5. Ryan Rodriguez v. West Publishing Corp. and Kaplan, Inc., No. CV-05-3222 R (MCx) (Cal. Central District Court) – An antitrust class action where FT LLP served as one of three law firms alleging nationwide national antitrust violations. \$49 million settlement finally approved.
6. In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation, No. 05cv1671 (C.D. Cal.) – Co-Lead Counsel in a certified class action lawsuit that alleges antitrust and common law violations which resulted in increased prices for RFG for purchasers. \$48 million settlement achieved

CONSUMER CLASS ACTION LITIGATION

In federal and state courts throughout the country, the firm represents consumers who have been injured or defrauded. Our cases involve individuals or classes of individuals who have been physically or economically damaged by the wrongdoing of others. Some of our cases seek to obtain financial relief, medical monitoring, injunctions and revised notification for classes of plaintiffs. Some of the cases we have brought include:

SETTLED REPRESENTATIVE SECURITY BREACH CLASS ACTION CASES

1. In Re TJX Companies Retail Security Breach Litigation, MDL 1838 (D. Mass.) Counsel in class action lawsuit alleging statutory and common law violations that resulted in a security breach of consumers' debit and credit card information. \$200 million settlement achieved.
2. Lockwood v. Certegy Check Serv., Inc., No. 8:07-cv-01434-SDM-TGW (M.D. Fla.) Counsel in class action lawsuit alleging common law violations that resulted in a security breach of consumers' personal and financial information. Available benefits made to Settlement Class Members of over \$500 million.
3. In re Countrywide Financial Corp. Customer Data Security, MDL 1998 (W.D. Ky.) Co-lead counsel in class action lawsuit alleging violations of common law, the California Business and Professions Code, and the Fair Credit Report Act, for data breach involving consumers' personal and financial information. Settlement resulted in a credit monitoring protection package for the class, the creation of an identity theft reimbursement fund of \$5 million, and the creation of an expense reimbursement fund for class members of \$1.5 million to compensate class members for actions taken as a result of the data breach.

SETTLED REPRESENTATIVE CONSUMER CLASS ACTION CASES

1. Gael M. Carter, et al. v. Associates Financial Services Co., Inc., et al., No. 96cv4652 (Tex. Dist. – Dallas County) – The firm played a pivotal role in pursuing the claims of millions of class members in a number of suits in states across the country against The Associates n/k/a Citifinancial, alleging consumer fraud relating to home equity and personal loan terms. Settlements achieved in the state, federal and companion FTC cases totaling \$240 million.

2. Cavan et al. v. Sears Roebuck & Co. and Whirlpool Corp., No. 04CH10354 (Ill. Circuit Court - Cook County) – Co-Lead counsel for consumer class action based upon the sale of Calypso® washing machines. Nationwide settlement reached and approved by the Court.
3. In re Diet Drugs Products Liability Litigation, MDL 1203 (E.D. Pa.). Co-Chair of the Non-PMC litigation group prosecuting class certification of claims not advanced by Plaintiffs' Management Committee.
4. Schulte v. Fifth Third Bank, 1:09-cv-06655 (N.D. Ill.) – Co-lead counsel in a consumer class action alleging re-sequencing of consumer banking transactions in highest to lowest order with intention of maximizing overdraft fee revenue. Nationwide settlement resulted in a settlement fund of \$9.5 million and injunctive relief valued at over \$100 million. First re-sequencing/overdraft fee settlement in the nation where bank agreed to terminate high to low re-sequencing as part of relief to the class.

ONGOING REPRESENTATIVE SECURITY BREACH CLASS ACTION CASES

1. Richardson, et al. v. Tricare Management Activity, et al., 1:11-cv-01961 (D.D.C.) Law suit alleging violations of the federal Privacy Act as a result of a security breach of insureds' personal and health information.

ONGOING REPRESENTATIVE CONSUMER CLASS ACTION CASES

1. In re Avandia Marketing, Sales Practices and Products Liability Litigation, MDL 1871 (E.D. Pa.) - FT serves as a member of the Plaintiffs Steering Committee and Co-Chair of the Class Action Sub-Committee. The suit alleges that SmithKline Beecham Corporation d/b/a GlaxoSmithKline used marketing schemes to deliberately conceal and affirmatively misrepresent the significant heart attack or heart-disease related risks associated with the use of the Avandia, Avandamet and Avandaryl – medications used to treat Type II diabetes.

ONGOING REPRESENTATIVE THIRD-PARTY PAYOR CLASS ACTION CASES

1. United Benefit Fund v. GlaxoSmithKline LLC, MDL 1871 (E.D. Pa.)- the firm serves a member of the Plaintiffs' Steering Committee, Co-Chairs the Class Action Sub-Committee, and is counsel of record for a third-party payor class action alleging that GSK created, monitored and/or controlled various marketing firms, physicians and ghostwriters to promote and disseminate – through sponsored events and publications – misleading messages about safety and efficacy relating to the use of Avandia.

FALSE CLAIMS ACT LITIGATION

The firm maintains an active practice under the Federal False Claims Act (also known as “*qui tam*” litigation). Through representation of whistleblowers who have independent knowledge of government contract fraud, the firm seeks to secure the return of millions of dollars to federal and state treasuries. The firm has investigated and filed *qui tam* claims in connection with the student loan industry.

BURTON H. FINKELSTEIN

Partner
(1937-2013)

BURTON H. FINKELSTEIN practiced securities litigation for more than forty years, first with the Securities and Exchange Commission, and then in private practice. At the SEC, he was special trial counsel and an Assistant Director of the Enforcement Division, where he was in charge of the administrative, civil and criminal litigation nationwide enforcement program. In 1970, he joined the New York firm of Phillips, Nizer, Benjamin, Krim & Ballon and was a partner in their Washington, D.C. office until 1977, when he and Mr. Thompson formed the firm now known as FINKELSTEIN THOMPSON LLP.

In private practice, Mr. Finkelstein participated in more than twenty securities fraud trials in cities throughout the United States, representing broker-dealers, principals and securities salesmen, attorneys, accountants, publicly and privately held companies and officers and directors of such companies. He also represented companies and individuals in SEC investigations, and served as special counsel to public companies in conducting internal investigations.

Mr. Finkelstein earned a B.B.A. degree in accounting from City College of New York in 1959 and an L.L.B. degree from the University of Pennsylvania in 1962. After military service and a brief stint as law clerk to the General Counsel of the Federal Power Commission, he began his securities litigation career as trial counsel at the SEC's Washington Regional Office.

Mr. Finkelstein appeared as a panelist in securities litigation and enforcement seminars for the Practising Law Institute, New York Law Journal and the American Law Institute - American Bar Association (ALI-ABA). He was an adjunct professor of law at Georgetown University Law School from 1979 to 1998. His course was entitled "Securities and Financial Frauds - Enforcement and Litigation."

Mr. Finkelstein practiced in the Washington, D.C. office.

DOUGLAS G. THOMPSON, JR.

Partner

DOUGLAS G. THOMPSON, JR. has specialized in administrative and civil trial and appellate litigation in private practice for over forty years. His practice has been concentrated in the areas of securities, commodities, banking, communications, and other complex business and financial transactions. Mr. Thompson has represented clients in federal court and before the Securities and Exchange Commission, the Commodity Futures Trading Commission, the Federal Trade Commission, the Federal Communications Commission, the Copyright Royalty Tribunal, and the Criminal Division of the Department of Justice. Mr. Thompson has litigated securities and commodities claims in failed savings and loan cases on behalf of the RTC and FDIC. As lead counsel for the FDIC, Mr. Thompson won a jury verdict of more than \$1 million after a lengthy trial involving commodities fraud issues.

Mr. Thompson received his A.B. and M.A. degrees in economics from Stanford University and his J.D. degree from Stanford Law School in 1969. He taught at the Stanford Law School in 1969-70 and clerked for Judge Ben. C. Duniway of the United States Court of Appeals, Ninth Circuit, in 1970-71. Following his clerkship, Mr. Thompson joined the law firm of Wilmer, Cutler & Pickering, Washington, DC, where he was a litigator in communications and securities law. In 1977, he joined with Mr. Finkelstein in the formation of the firm now known as FINKELSTEIN THOMPSON LLP.

Mr. Thompson is a member of the bar of the District of Columbia and the State of California and of several federal district and appellate courts.

Mr. Thompson practices in the Washington, DC office.

MILA F. BARTOS

Partner

MILA F. BARTOS has been with FINKELSTEIN THOMPSON LLP since January 1995. Ms. Bartos practices in the fields of both antitrust litigation and consumer fraud class action cases, including adulterated and toxic products. She is a 1990 graduate of the University of Wisconsin - Madison where she received a joint Bachelor of Arts degree in English and Communications. Ms. Bartos then attended the American University Washington College of Law where she received her Juris Doctor in 1993. At American University, Ms. Bartos was a co-founder of the *American University Journal of Gender and Law* and was a member of the Editorial Board.

Ms. Bartos is the author of the article, "Law Firm Collaboration Via Extranets" published in the Law Library Resource Xchange. She is also an active member of the Chairman's Council of the Appleseed Foundation. Ms. Bartos is a member of the Maryland and District of Columbia Bars.

Ms. Bartos practices in the Washington, DC office.

MICHAEL G. McLELLAN
Partner

MICHAEL G. McLELLAN joined FINKELSTEIN THOMPSON LLP in May 2004. Mr. McLellan practices in the fields of securities, antitrust and consumer fraud litigation. He is a 1996 graduate of the University of South Carolina, where he received a Bachelor of Arts degree in English. Mr. McLellan also attended the University of South Carolina School of Law, where he received his Juris Doctor in 2003. During law school, Mr. McLellan served as Articles Editor for the South Carolina Law Review and was awarded membership in the Order of the Wig and Robe. Upon graduation, Mr. McLellan attended the American University Washington College of Law, where he received an LL.M. in Law and Government, magna cum laude in 2004. While pursuing his LL.M. degree, Mr. McLellan worked as an intern for the Securities and Exchange Commission in the Division of Enforcement and volunteered as a Constitutional Law teacher at Ballou Stay High School. He additionally worked as an independent researcher for the Association of Corporate Counsel.

Mr. McLellan is a member of the South Carolina and District of Columbia bars, and practices in the Washington, DC office.

ROSALEE B. C. THOMAS

Partner

ROSALEE THOMAS joined FINKELSTEIN THOMPSON LLP in October 2006 and practices in the fields of antitrust, consumer fraud and securities litigation. Ms. Thomas graduated from Columbia University in 1999, where she studied Political Science. She received her Juris Doctorate from Georgetown Law in 2004 and was recognized as a Pro Bono Pledge Honoree. While in law school, Ms. Thomas participated in the Street Law Clinic and served as a student attorney with the D.C. Law Students in Court Clinical Program. Ms. Thomas also completed a clerkship at the U.S. Consumer Product Safety Commission.

Ms. Thomas is a member of the New York, New Jersey, District of Columbia, and Maryland bars and is admitted to practice in the United States District Court for the District Courts of New Jersey, Southern District of New York, United States Court of Appeals for the Ninth Circuit, and the District of Columbia.

Ms. Thomas practices in the Washington, DC office.

EBONIE BRANCH
Associate

EBONIE BRANCH re-joined FINKELSTEIN THOMPSON LLP in March 2017 and practices in the fields of antitrust, consumer fraud and securities litigation. She graduated from American University with a B.A. *cum laude* in justice and then worked as a paralegal for Finkelstein Thompson LLP. Ms. Branch graduated from the Howard University School of Law in 2011 and was recognized with a CALI Award for Outstanding Academic Achievement in Criminal Law. During law school, she served as the Senior Editor of the Human Rights and Globalization Law Review as well as a Student Defense Attorney in the Criminal Justice Clinic. She came back to Finkelstein Thompson LLP to work as a law clerk during her third year at Howard Law.

Before rejoining Finkelstein Thompson LLP as an associate, Ms. Branch gained criminal litigation experience as a prosecutor. From 2011 until 2014, Ms. Branch served as an Assistant District Attorney at the Philadelphia District Attorney's Office. Ms. Branch then joined the U.S. Attorney's Office in DC as an Assistant United States Attorney. In both capacities, Ms. Branch vigorously prosecuted gun and narcotics offenses in addition to violent crimes.

Ms. Branch is a member of the Pennsylvania Bar and practices in the Washington, DC office.

ROBERT O. WILSON
Of Counsel

ROBERT WILSON re-associated as Of Counsel with FINKELSTEIN THOMPSON LLP since February 2015 and practices in the fields of *qui tam*, shareholder, consumer protection, and antitrust litigation. Mr. Wilson graduated from James Madison University in 2003, with a Bachelor of Arts in English, with a minor in Theatre. He graduated *cum laude* from George Mason University School of Law in 2008. While in law school, he served on the editorial board of the *George Mason University Civil Rights Law Journal*.

Mr. Wilson was an associate with the firm from 2011 to 2014. Before joining Finkelstein Thompson LLP, Mr. Wilson clerked for the Honorable David S. Schell of the Fairfax Circuit Court, in the 19th Judicial Circuit of Virginia, and practiced civil and criminal litigation in the Northern Virginia area.

Mr. Wilson's published works include *A Defense of Disclosure-based Settlements in US M&A Litigation*, Financier Worldwide.com (February 2013); *Free Speech v. Trial by Jury: The Role of the Jury in the Application of the Pickering Test*, 18 *George Mason University Civil Rights Law Journal* 389 (2008); and *Dura Pharmaceuticals: Loss Causation Redefined or Merely Clarified?*, *Journal of Taxation and Regulation of Financial Institutions*, September/October 2007, at 5 (with Donald J. Enright).

Mr. Wilson is a member of the Virginia and District of Columbia bars.

GORDON M. FAUTH
Of Counsel

GORDON M. FAUTH has been Of Counsel with FINKELSTEIN THOMPSON LLP since March 2017 and practices in the fields of consumer protection and antitrust litigation. Mr. Fauth has a cutting edge background in complex litigation, with extensive experience in civil litigation, including class action and antitrust litigation, consumer litigation, civil rights, personal injury and business litigation. He has successfully prosecuted many actions in which multi-million dollar results were achieved. Mr. Fauth received his undergraduate degree in Government from Harvard University and his law degree from the University of California at Berkeley in 1997.

Mr. Fauth is admitted to practice before both California and Federal courts, including all California trial courts; the California Court of Appeals; the California Supreme Court; the United State District Courts for the Northern, Eastern, and Central Districts of California; the United States Courts of Appeals for the Fifth and Ninth Circuits; and the United States Supreme Court. He has filed briefs with the California Supreme Court and the United States Supreme Court.

Mr. Fauth is a recognized member of professional organizations including the California Bar Association, the Alameda County Bar Association, and the San Francisco Trial Lawyers Association. He has served as an Advisory Board Member of the American Bar Association.

ROSANNE L. MAH
Of Counsel

ROSANNE L. MAH has been Of Counsel with FINKELSTEIN THOMPSON LLP since March 2017 and practices in the fields of consumer protection, and is an experienced litigator in business law, employment law, and estate planning. She has guided businesses of all kinds, in many different litigation matters. Ms. Mah received undergraduate degree from the University of California at Santa Cruz and her law degree from the University of San Francisco, School of Law in 2005.

Ms. Mah is admitted to practice before both California and Federal courts, including all California trial courts; the California Court of Appeals; the California Supreme Court; and the United State District Courts for the Northern and Eastern Districts of California.

Ms. Mah is a member of the California State Bar Association. Ms. Mah has volunteered at the Debt Defense and Education Clinic for the Bar Association of San Francisco's Volunteer Legal Services Program. She received the Outstanding Volunteer in Public Service Certificate for her pro bono work in 2010 and 2011 for the Volunteer Legal Services Program.

HENRY WOODS

Paralegal

HENRY WOODS joined FINKELSTEIN THOMPSON LLP in September 2017. He received a Bachelor of Arts in Strategic, Legal & Management Communications from Howard University School of Communication. He is a member of Phi Beta Sigma Fraternity Inc. and received the TRiO Scholars Scholarship for excellent leadership and achievement. Prior to joining FT, he gained ample experience working in legal offices such as the District of Columbia's Office of the Attorney General, the Cochran Firm, and D.C. Court Services & Offender Supervision Agency.

Mr. Woods works in the Washington, DC office.

EXHIBIT 2

EXHIBIT 2*In re Lithium Ion Batteries Antitrust Litigation, Case No. 13-MD-2420 YGR***FINKELSTEIN THOMPSON LLP**

Reported Hours and Lodestar on a Historical Basis

June 1, 2013 through August 31, 2017

NAME	STATUS	YEAR	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
ATTORNEYS					
Michael G. McLellan - Partner 1	P	2016	11.20	\$625.00	\$7,000.00
Michael G. McLellan - Partner 1	P	2015	66.50	\$625.00	\$41,562.50
Michael G. McLellan - Partner 1	P	2014	0.80	\$575.00	\$460.00
Michael G. McLellan - Partner 1	P	2013	0.60	\$575.00	\$345.00
Rosalee B.C. Thomas - Partner 2	P	2015	33.40	\$350.00	\$11,690.00
Rosalee B.C. Thomas - Partner 2	P	2014	0.10	\$350.00	\$35.00
Eugene J. Benick - Associate 1	A	2014	1.80	\$425.00	\$765.00
Eugene J. Benick - Associate 1	A	2013	1.30	\$425.00	\$552.50
Elizabeth R. Makris - Associate 2	A	2014	87.00	\$350.00	\$30,450.00
Quentin A. Roberts - Associate 3	A	2016	26.10	\$350.00	\$9,135.00
NON-ATTORNEYS					
Paralegal 1	PL	2017			\$0.00
TOTAL:			228.80		\$101,995.00

(P) Partner

(A) Associate

(INV) Investigator

(PL) Paralegal

EXHIBIT 3

*In re Lithium Ion Batteries Antitrust Litigation, Case No. 13-MD-2420 YGR***EXHIBIT 3****FINKELSTEIN THOMPSON LLP**

Expenses Incurred

June 1, 2013 through August 31, 2017

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	
Computer Research (Lexis, Westlaw, PACER, etc.)	\$119.50
Document Production	
Experts / Consultants	
Messenger Delivery	\$61.81
Photocopies - In House	
Photocopies - Outside	
Postage	
Service of Process	
Overnight Delivery (Federal Express, etc.)	
Telephone / Facsimile	\$25.05
Transcripts (Hearings, Depositions, etc.)	
Travel (Airfare, Ground Travel)	
Travel (Meals and Lodging)	
TOTAL	\$206.36