

# **EXHIBIT JJ**

1 R. Alexander Saveri (Bar No. 173102)  
Geoffrey C. Rushing (Bar No. 126910)  
2 **SAVERI & SAVERI, INC.**  
706 Sansome Street  
3 San Francisco, CA 94111  
Telephone: (415) 217-6810  
4 Facsimile: (415) 217-6813

5 Bruce L. Simon (Bar No. 96241)  
Benjamin E. Shiftan (Bar No. 265767)  
6 **PEARSON, SIMON & WARSHAW, LLP**  
44 Montgomery Street, Suite 2450  
7 San Francisco, CA 94104  
Telephone: (415) 433-9000  
8 Facsimile: (415) 433-9008

9 Joseph J. Tabacco, Jr. (Bar No. 75484)  
Todd A. Seaver (Bar No. 271067)  
10 Jessica Moy (Bar No. 272941)  
**BERMAN TABACCO**  
11 44 Montgomery Street, Suite 650  
San Francisco, CA 94104  
12 Telephone: (415) 433-3200  
Facsimile: (415) 433-6382

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  
ANTITRUST LITIGATION

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

19  
20 This Document Relates to:  
21 ALL DIRECT PURCHASER CLASS AC-  
22 TIONS

**DECLARATION OF WEINSTEIN  
KITCHENOFF & ASHER LLC IN SUP-  
PORT OF DIRECT PURCHASER  
PLAINTIFFS MOTION FOR AN AWARD  
OF ATTORNEYS' FEES, REIMBURSE-  
MENT OF EXPENSES, AND INCENTIVE  
AWARDS**

1 I, Robert S. Kitchenoff, declare and state as follows:

2 1. I am a member of the law firm of Weinstein Kitchenoff & Asher LLC. I submit this  
3 declaration in support of Direct Purchaser Plaintiffs (“DPP”) application for an award of attor-  
4 neys’ fees and reimbursement of expenses in connection with the services rendered in this litiga-  
5 tion. I make this Declaration based on my own personal knowledge, and if called as a witness, I  
6 could and would competently testify to the matters stated herein.

7 2. My firm has served as counsel to Daniel Meir and as counsel for the Direct Purchaser  
8 Class (“Class”) throughout the course of this litigation. The background and experience of Wein-  
9 stein Kitchenoff & Asher LLC and its attorneys are summarized in the *curriculum vitae* attached  
10 hereto as Exhibit 1.

11 3. Weinstein Kitchenoff & Asher LLC has prosecuted this litigation solely on a contin-  
12 gent-fee basis, and has been at risk that it would not receive any compensation for prosecuting  
13 claims against the Defendants. While Weinstein Kitchenoff & Asher LLC devoted its time and  
14 resources to this matter, it has foregone other legal work for which it could have been compen-  
15 sated.

16 4. During the pendency of the litigation, Weinstein Kitchenoff & Asher LLC performed  
17 the following work: drafted and edited the Consolidated Amended Complaint, including reviewing  
18 discovery materials, cooperation materials, and translated documents for use in pleading the facts  
19 as well as performing legal research for pleading fraudulent concealment and certain other issues  
20 and claims; drafted and edited the opposition to defendants’ motion to dismiss; preformed legal  
21 research on standing; drafted and edited the Second Consolidated Amended Complaint; assisted in  
22 the preparation of counsel to argue the motion to dismiss; met and conferred with counsel for de-  
23 fendants regarding defendants’ discovery responses; analyzed and coded documents produced by  
24 defendants in discovery, and prepared document summaries and weekly status memos.

25 5. Attached hereto as Exhibit 2 is my firm’s total hours and lodestar, computed at histori-  
26 cal rates, for the period of June 1, 2013 through August 31, 2017. This period reflects the time  
27 spent after the appointment of Interim Co-Lead Counsel and Liaison Counsel for Direct Purchased



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

3 d. the highest hourly rates for Attorneys at the Associate level engaged in English-  
4 language document review is capped at \$350 per hour; a cap of \$400 per hour is permitted where  
5 the reviewer has special skill set, such as foreign language translation, and Lead Counsel has ap-  
6 proved that work performed; and

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

8 8. My firm has expended a total of \$2,958.37 in unreimbursed costs and expenses in con-  
9 nection with the prosecution of this litigation. These costs and expenses are broken down in the  
10 chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs by  
11 my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this action  
12 are reflected on the books and records of my firm. These books and records are prepared from ex-  
13 pense vouchers, check records and other source materials and represent an accurate recordation of  
14 the expenses incurred.

15 9. The Weinstein Kitchenoff & Asher LLC paid a total of \$80,000.00 in assessments for  
16 the joint prosecution of the litigation against the Defendants.

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

22 I declare under penalty of perjury under the laws of the United States of America that the  
23 foregoing is true and correct. Executed on this 30th day of January, 2018 at Philadelphia, Pennsyl-  
24 vania.

25   
26 **ROBERT S. KITCHENOFF**

# EXHIBIT 1



---

## **WEINSTEIN KITCHENOFF & ASHER LLC**

Weinstein Kitchenoff & Asher LLC (“WKA”) is a pre-eminent Philadelphia-based national law firm whose attorneys have served as counsel in many of the most significant and successful class action cases in the past 25 years. Its litigators are experienced in five major practice areas: antitrust; consumer protection; securities and derivatives fraud; complex business and commercial litigation; and Whistleblower/False Claims Act litigation.

### **ATTORNEYS**

#### **DAVID H. WEINSTEIN**

Mr. Weinstein is the Firm’s senior member. He concentrates his practice in litigating complex commercial matters.

Since 1972, Mr. Weinstein has represented clients charging some of the nation’s largest companies with violating the antitrust, commodities, consumer protection, retirement, R.I.C.O., and securities laws. He has pursued litigation in such varied fields and industries as accounting, cattle and cattle futures, computers, copper, electronic components, healthcare, insurance, law firms, milk, motion pictures, oil and gas, propane, retirement plans, and refuse hauling and recycling.

Among other current matters, Mr. Weinstein is court-appointed interim co-lead counsel for a class of Jewish survivors and the estates and heirs of the Jewish victims of the Holocaust in Hungary. They have sued the Republic of Hungary and the Hungarian National Railways. The claims arise from the defendants’ participation in crimes against humanity.

Mr. Weinstein is also interim co-lead counsel for a proposed class of bondholders who were injured as a result of various banks’ manipulation of the LIBOR interest rate benchmark.

Mr. Weinstein was co-lead counsel in an antitrust class action involving manipulation of the propane market. In that case the court approved a \$50 million settlement, which was recently distributed to the class members. In addition, Mr. Weinstein recently successfully defended a lawyer and his firm who were sued in an action brought as a class action.

Mr. Weinstein has previously participated in a number of noteworthy matters during his career. Chief among these, he successfully prosecuted a class

---

action for homeowners nationwide whose homes contained polybutylene plumbing. As co-lead counsel in the case, Mr. Weinstein achieved an innovative settlement that, over a 15-year period, replaced defective plumbing in approximately 340,000 homes in the United States at a cost of over \$1.1 billion, one of the largest property-damage class-action settlements in history. He also served on the steering committee of attorneys who recovered over \$700 million for retail pharmacies in a class action charging major manufacturers and wholesalers of brand name prescription drugs with conspiring not to offer discounts to retail pharmacies. On a pro bono basis, Mr. Weinstein was court appointed sole lead counsel in complex coordinated immigration proceedings concerning over 100 refugees seeking asylum in the U.S.

Outside the courtroom, Mr. Weinstein has served on the boards of directors of various law-related and other non-profit organizations, including the Public Justice Foundation, a national public interest legal foundation that strives to protect the liberties and rights of individuals often victimized in our society. He has served as co-chair of the Professional Guidance Committee of the Philadelphia Bar Association, which provides guidance to practicing lawyers on ethical issues. He is an elected member of the American Law Institute, a national professional society dedicated to the simplification and improvement of American law. Mr. Weinstein is also a member of the Committee to Save the Antitrust Laws, and he has lectured on various topics in courses for practicing lawyers and at the college level. In addition, Mr. Weinstein is currently a member of the Board of Governors of Gratz College and an honorary director and past president of his synagogue.

Mr. Weinstein earned his undergraduate and law degrees from the University of California, Berkeley. Before entering private practice, he served as law clerk for two different judges of the United States Court of Appeals for the Ninth Circuit. He is a member of the Pennsylvania and California bars, and has been admitted to practice before the U.S. Supreme Court, and various federal district courts and courts of appeals.

#### **ROBERT S. KITCHENOFF**

Mr. Kitchenoff, a founding member of Weinstein Kitchenoff & Asher LLC, concentrates his practice in the prosecution of antitrust, consumer fraud, securities fraud, and ERISA class actions as well as False Claims Act (whistleblower), shareholder derivative, and other complex civil matters.



Mr. Kitchenoff has been involved in the litigation of numerous precedent-setting antitrust actions including, among others, *In re Copper Antitrust Litigation*, MDL Docket 1303 (co-lead counsel); *Brand Name Prescription Drugs Antitrust Litigation*, MDL No. 997 (N.D. Ill.) (plaintiffs' steering committee); *In Re: Payment Card Interchange Fee & Merchant Discount Antitrust Litigation*, MDL Docket 1720 (plaintiffs' steering committee), *In re Pressure Sensitive Labelstock Antitrust Litigation*, MDL Docket 1556 (discovery team); and *Rolite, Inc. v. Wheelabrator Technologies, Inc.* Civil Action No. 94-CV-5894 (E.D. Pa.).

Mr. Kitchenoff currently serves as court appointed co-lead counsel in *In re: Ductile Iron Pipe Fittings ("DIPF") Indirect Purchaser Antitrust Litigation*, No. 12-cv-169 (D.N.J), and as court appointed liaison and settlement class counsel in *In re Imprelis Herbicide Marketing, Sales Practices and Products Liability Litig.*, 11-2284-GP (E.D. PA).

In the area of consumer-oriented litigation, Mr. Kitchenoff has successfully represented several nationwide classes of individuals who were damaged by the application of a DuPont herbicide (*In re Imprelis Herbicide Marketing, Sales Practices and Products Liability Litig.*), where he was appointed Settlement Class Counsel; mortgagors who were improperly assessed late fees on timely received mortgage loan payments (*Keller v. First Union Corporation*), a class of homeowners who were led to believe, by the builder of their homes, that they were receiving "thermal break" windows that were "as good as an Andersen<sup>®</sup>." (*Frazier v. Weyerhaeuser*), and a class of owners of homes and buildings throughout the United States which contain defective polybutylene plumbing systems (*Tina Cox, et al. v. Shell Oil Co., et al.*), among others. The settlement of the *Cox* litigation, believed to be one of the largest property damage class action settlements in history, having provided more than \$1 billion to qualifying homeowners for repairs to their plumbing systems or complete replumbing of their homes and reimbursement for property damage at 100 cents on the dollar.

Mr. Kitchenoff frequently represents doctors and other medical providers in litigation against insurance companies who fail to properly reimburse them for services rendered and medical equipment supplied.

Mr. Kitchenoff has been active in the legal community in pro bono and educational activities. He currently serves on the President-Elect of COSAL (the Committee to Support the Antitrust Laws), and previously served as a member of the Advisory Board of the Class Action Law Monitor. He is a member of the Class Action and Derivative Suits Committee of the American Bar Association, and the

Cy Pres Committee and Antitrust Committees of the Philadelphia Bar Association. He has been a course planner and lecturer on class actions for numerous providers of continuing legal education. He has been honored with the Public Justice Achievement Award by Trial Lawyers for Public Justice, a respected Washington, D.C. public interest foundation, for his work on the Polybutylene Pipes case, and by the American Immigration Lawyers Association with its Human Rights Award as a member of the Asian American/“Golden Venture” Pro Bono Advocacy Team, representing Chinese aliens on a pro bono basis seeking asylum in the United States based upon their opposition to China’s one child per couple population control policy. He has been named one of Pennsylvania’s Super Lawyers®, an honor bestowed upon only 5% of Pennsylvania attorneys, and has been accorded an AV Martindale-Hubbell Peer Review rating.

Mr. Kitchenoff is also active in the broader community, most recently having served as President of the Board of Directors of the Philadelphia Region of the Jewish National Fund. He is a former President of Temple Beth Hillel-Beth El, an 800 family synagogue located in suburban Philadelphia.

Mr. Kitchenoff is a graduate of the University of Pittsburgh (B.A. 1981), and the Rutgers University School of Law (J.D. 1986). Prior to entering private practice, he served as law clerk to the Honorable Madaline Palladino of the Commonwealth Court of Pennsylvania.

#### **MINDEE J. REUBEN**

Ms. Reuben, a former member of the firm, focuses her practice on antitrust and consumer class action matters. In recent years, *Super Lawyers* and *Philadelphia Magazine* have repeatedly named Ms. Reuben one of Pennsylvania’s “Super Lawyers” in the field of antitrust, as well as one of the top 50 women Super Lawyers in Pennsylvania. (*Super Lawyers* previously named her as one of Pennsylvania’s “Rising Stars” in the field of antitrust for several years running, an honor bestowed on only 2.5% of Pennsylvania lawyers under 40).

Ms. Reuben is co-lead and liaison counsel in *In re: Processed Eggs Products Antitrust Litigation*, No. 08-md-2002 (E.D. Pa.) and was also a member of the Executive Committee in *In re: Polyurethane Foam Antitrust Litigation*, MDL No. 2196 (N.D. Ohio). She is also significantly involved in several plaintiff class action antitrust matters in which she, her firm, or members of her firm, have been appointed co-lead counsel or to case management committees. Exemplar cases in which Ms. Reuben has been engaged include: *In re: Lithium Ion Batteries*

*Antitrust Litigation*, No. 13-md-2420 (N.D. Cal.); *In re: Automotive Parts Antitrust Litigation*, No. 12-md-2311 (E.D. Mich.); *In re: Vehicle Carrier Services Antitrust Litigation*, No. 13-cv-3306 (D.N.J.); and *In re: Ductile Iron Pipe Fittings (“DIPF”) Indirect Purchaser Antitrust Litigation*, No. 12-cv-169 (D.N.J).

Other (historical) antitrust matters in which Ms. Reuben has been heavily engaged include: *BP Products North America, Inc. Antitrust Litigation* (N.D. Ill.) (\$52 million settlement); *In re Polyester Staple Antitrust Litigation* (W.D.N.C.) (\$50 million settlement); *In re Electrical Carbon Products Antitrust Litigation* (D.N.J.) (\$21 million settlement); *In re: Cotton Yarn Antitrust Litigation*, (M.D.N.C.) (\$7.8 million settlement); *In re Sulfuric Acid Antitrust Litigation*, (N.D. Ill.) (\$7 million settlement).

Ms. Reuben has also served as class counsel in the consumer class action of *Fritzinger v. Angie’s List*, Case No. 12-cv-1118 (S.D. Ind.), and as co-lead counsel in *Stone v. Stewart Title Guaranty Co.*, Philadelphia Court of Common Pleas, June Term, 2006, No. 2003 (consol, under *Cummings v. Stewart Title Guaranty Co., et al.*, Philadelphia Court of Common Pleas, March Term, 2005, No. 747) (Glazer, J.), where a settlement in the amount of \$4.5 million dollars was finally approved. At the final approval hearing, the Court noted that “counsel really did an extraordinary job.”

Professionally, Ms. Reuben is actively involved with the Philadelphia Bar Association. She was Vice Chair of its 2013 Bench Bar and Annual Meeting, a past Chair of its Women’s Rights Committee, and is a member of the Federal Courts Committee, Women in the Profession Committee, and Business Law Section. She is a founding member of Women Antitrust Plaintiffs’ Attorneys, a national organization of women who focus their practices on cartel and other anticompetitive cases. She has mentored 1L students at Temple University School of Law through its Women’s Law Caucus, served as an Adjunct Professor of Law at the James E. Beasley School of Law of Temple University, contributed to comprehensive legal publications, and spoken on a variety of subjects including ethics and the Federal Rules of Civil Procedure.

Ms. Reuben attended Indiana University in Bloomington, Indiana, on a Merit Scholarship and graduated in 1989 with a B.A. in both English and Political Science. She pursued a joint degree program at the University of Pittsburgh, and received her J.D. from the School of Law, which she attended on a Dean’s Merit Scholarship, and her Master of Public Administration from the Graduate School of Public and International Affairs in 1993. Following graduation from the University

of Pittsburgh, Ms. Reuben served as a law clerk for the Honorable Frank J. Montemuro, Senior Justice of the Supreme Court of Pennsylvania.

**STEVEN A. ASHER (1947-2015)**

Mr. Asher was a founding member of the firm and concentrated his practice in class action antitrust litigation. He served as co-lead counsel for plaintiffs in many of the major antitrust class actions over the last 25 years, and recovered hundreds of millions of dollars for the plaintiff classes which he has been appointed to represent.

In its ranking of the top U.S. business attorneys, *Chambers & Partners USA* noted that Mr. Asher is “highly knowledgeable and experienced” and has “garnered peer approval for his ‘*tough, aggressive*’ approach, which often results in multimillion dollar settlements.” Mr. Asher has also been listed in *Best Lawyers in America* since 2006, has perennially been named to the *Pennsylvania Super Lawyers* publication and maintains a Martindale-Hubbell AV Peer Review Rating.

Mr. Asher served as co-lead counsel for plaintiffs in the following successful antitrust class actions:

- *In re Graphite Electrodes Antitrust Litigation* (E.D. Pa.) – Recovery in excess of \$134 million in action alleging that certain manufacturers and distributors conspired through meetings and communications to fix the prices of, and allocate markets for, graphite electrodes -- a product used in making steel.
- *In re Flat Glass Antitrust Litigation* (W.D. Pa.) – Recovery in excess of \$120 million on behalf of class of direct purchasers of high-strength glass used in construction and automotive applications.
- *In re Citric Acid Antitrust Litigation* (N.D. Cal.) – Recovery in excess of \$90 million in action against major manufacturers of citric acid for fixing prices and allocating customers.
- *In re Sorbates Direct Purchaser Antitrust Litigation* (N.D. Cal.) – Recovery in excess of \$90 million in action against U.S. and foreign manufacturers of food preservatives for conspiring to fix prices.

- *Thomas & Thomas Rodmakers, Inc. v. Newport Adhesives & Composites, Inc.* (C.D. Cal.) – Recovery of approximately \$68 million on behalf of purchasers of carbon fiber and related products in action alleging that major sporting goods manufacturers had conspired to raise the prices of products containing carbon fiber.
- *BP Products North America, Inc. Antitrust Litigation* (N.D. Ill.) -- Recovery in excess of \$52 million on behalf of direct purchasers of both physical propane and propane futures contracts. The class alleged that the defendant sought to and did corner the market for propane within a large geographic area of the United States in February 2004.
- *In re Polypropylene Carpet Antitrust Litigation* (N.D. Ga.) – Recovery of approximately \$50 million on behalf of distributors who purchased polypropylene carpet and alleged that manufactures had conspired to fix prices.
- *In re Chlorine and Caustic Soda Antitrust Litigation* (E.D. Pa.) – Recovery in excess of \$50 million in action alleging conspiracy by the major producers of “chlor-alkali” products to fix, raise, maintain and stabilize prices.
- *Cumberland Farms, Inc., et al. v. Browning-Ferris Indus., Inc., et al.* (E.D. Pa.) – Recovery in excess of \$50 million on behalf of class of direct purchasers of solid waste hauling and disposal services which alleged a conspiracy to fix prices entered into by major providers of solid waste collection services.
- *In re Polyester Staple Antitrust Litigation* (W.D.N.C.) – Recovery in excess of \$50 million in an action by a class of direct purchasers against four of the largest manufacturers of polyester staple products, alleging a conspiracy to fix prices and allocate markets and customers in violation of Section 1 of the Sherman Act, 15 U.S.C. § 1.
- *In re Electrical Carbon Products Antitrust Litigation* (D.N.J.) – Recovery in excess of \$21 million in suit alleging conspiracy by certain manufacturers to fix prices and to allocate customers and markets for industrial electric products.

- *In re Residential Doors Antitrust Litigation* (E.D. Pa.) – Recovery in excess of \$14 million on behalf of class of distributors of residential flush doors who brought suit against door manufacturers for price fixing.
- *In re: Cotton Yarn Antitrust Litigation*, MDL No. 1622 (M.D.N.C.) – Recovery in amount of \$7.8 million on behalf of direct purchasers of cotton yarn in connection with alleged conspiracy by producers to fix prices.
- *In re NY State Beer Antitrust Litigation* (E.D.N.Y.) – Recovery in excess of \$14 million on behalf of class of beer retailers and wholesalers in action against various brewers alleging a conspiracy to enter into exclusive territory contracts.
- *In re Sulfuric Acid Antitrust Litigation*, MDL No. 1536 (N.D. Ill.) -- Recovery in excess of \$7 million on behalf of class of direct purchasers alleging that major manufacturers of sulfuric acid conspired to fix prices.
- *In re Plastic Tableware Antitrust Litigation* (E.D. Pa.) – Recovery in excess of \$6 million on behalf of purchasers of plastic tableware alleging a conspiracy by major manufacturers to fix prices.
- *Capitol Sign Company, Inc. v. Alliance Metals, Inc., et al.* (E.D. Pa.) – Recovery in excess of \$4 million on behalf of purchasers of painted aluminum products in action alleging that major manufacturers conspired to fix prices at artificially inflated levels.
- *In re Plastic Cutlery Antitrust Litigation* (E.D. Pa.) – Recovery in excess of \$3 million in action against major producers of plastic cutlery alleging a conspiracy to fix, raise, maintain and stabilize prices.
- *In re Metal Building Insulation Antitrust Litigation* (S.D. Tex.) – Recovery in excess of \$1 million on behalf of purchasers of metal building insulation products which alleged a conspiracy by manufacturers to fix prices.

- *In re Tampico Fiber Antitrust Litigation* (E.D. Pa.) – Recovery in excess of \$1 million in action alleging a conspiracy by manufacturers of fiber used in commercial brushes to fix prices.

Mr. Asher graduated from The Johns Hopkins University in 1969 with a B.A. in philosophy, and received a J.D. from New York University's School of Law in 1973 where he was an editor of the Law Review and winner of the Edmond Cahn award given annually to the outstanding law review editor. He was a former chair of the Philadelphia Bar Association Antitrust Law Committee, lectured for several years on antitrust litigation for the Department of Economics at the University of Pennsylvania, and had lectured on class action and antitrust topics for continuing legal education groups throughout the country.

#### **ANDREA L. WILSON**

Andrea L. Wilson focuses her practice on complex litigation matters, particularly antitrust and consumer class actions and commercial litigation. Ms. Wilson also has significant experience in securities and ERISA class litigation.

Ms. Wilson is highly regarded in the class action arena for her electronic discovery management skills, and is often sought out for guidance and participation on such matters. Throughout her years as a lawyer, Ms. Wilson has participated in multi-firm litigation committees to manage discovery in complex litigation and has developed and manage litigation support systems for large complex class actions. In addition,

Ms. Wilson is also certified as a FINRA Dispute Resolution Arbitrator. FINRA, the Financial Industry Regulatory Authority, is the largest independent regulator for securities firms operating in the United States.

Ms. Wilson is a member of the bars of Pennsylvania and New Jersey. She is admitted to practice in the Third Circuit, the Eastern District of Pennsylvania and the District of New Jersey. Ms. Wilson received her Bachelor of Arts degree in Management Information Systems from California State University in 1989, her J.D. from Temple University School of Law in 1994 and her L.L.M. in Taxation, with honors, from Temple University School of Law. She has also received a Master of Science degree from Boston University in Computer Information Systems with a concentration in Database Management and Business Intelligence, which includes coursework in Digital Forensics.

# EXHIBIT 2



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

Weinstein Kitchenoff &amp; Asher LLC

Reported Hours and Lodestar on a Historical Basis

June 1, 2013 through August 31, 2017

<b>NAME</b>	<b>STATUS</b>	<b>YEAR</b>	<b>TOTAL HOURS</b>	<b>HISTORICAL HOURLY RATE</b>	<b>LODESTAR</b>
<b>ATTORNEYS</b>					
Steven A. Asher	P	2014	40.30	\$750.00	\$30,225.00
Steven A. Asher	P	2013	82.00	\$740.00	\$60,680.00
Mindee J. Reuben	P	2015	66.80	\$650.00	\$43,420.00
Mindee J. Reuben	P	2014	96.20	\$650.00	\$62,530.00
Mindee J. Reuben	P	2013	132.60	\$650.00	\$86,190.00
Edward J. Skipton	A	2014	3.50	\$375.00	\$1,312.50
Edward J. Skipton	A	2013	106.80	\$375.00	\$40,050.00
Jeremy S. Spiegel	A	2014	26.10	\$450.00	\$11,745.00
Jeremy S. Spiegel	A	2013	69.50	\$450.00	\$31,275.00
Andrea Wilson	A	2016	487.00	\$350.00	\$170,450.00
Andrea Wilson	A	2015	1,195.30	\$350.00	\$418,355.00
<b>NON-ATTORNEYS</b>					
Paralegal 1	PL	2013			\$0.00
Paralegal 2	PL	2013			\$0.00
<b>TOTAL:</b>			<b>2,306.10</b>		<b>\$956,232.50</b>

(P) Partner

(A) Associate

(INV) Investigator

# EXHIBIT 3

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

Firm's name

Expenses Incurred

June 1, 2013 through August 31, 2017

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Court Fees (filing, etc.)	\$305.00
Computer Research (Lexis, Westlaw, PACER, etc.)	\$365.67
Document Production	
Experts / Consultants	
Messenger Delivery	
Photocopies - In House	
Photocopies - Outside	
Postage	
Service of Process	
Overnight Delivery (Federal Express, etc.)	
Telephone / Facsimile	\$22.36
Transcripts (Hearings, Depositions, etc.)	
Travel (Airfare, Ground Travel)	\$788.62
Travel (Meals and Lodging)	\$1,476.72
<b>TOTAL</b>	<b>\$2,958.37</b>