

1 Joel C. Meredith  
2 Meredith & Associates  
3 1521 Locust Street, 7<sup>th</sup> Floor  
4 Philadelphia, PA 19102  
5 215-564-5182

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9 *Class Counsel for Indirect Purchaser Plaintiffs*

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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**  
14

15 **IN RE: CAPACITORS ANTITRUST**  
16 **LITIGATION**

**MASTER FILE NO. 14-cv-03264-JD**

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18 **THIS DOCUMENT RELATES TO:**  
19 **ALL INDIRECT PURCHASER ACTIONS**  
20

**DECLARATION OF MEREDITH &  
ASSOCIATES IN SUPPORT OF CLASS  
COUNSEL'S APPLICATION FOR  
ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES  
SUBMITTED ON BEHALF OF  
MEREDITH & ASSOCIATES**

**Date: July 6, 2017**  
**Time: 10:00 a.m.**  
**Place: Courtroom 11, 19<sup>th</sup> Floor**

Judge: Hon. James Donato

1 I, Joel C. Meredith, declare and state as follows:

2 1. I am a Partner of Meredith & Associates, Counsel for Indirect Purchaser Plaintiffs  
3 (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of Class Counsel’s  
4 interim application for attorneys’ fees and reimbursement of expenses reasonably incurred in  
5 connection with the services rendered in this litigation on behalf of the class. I make this  
6 declaration based on my personal knowledge and if called as a witness, I could and would  
7 competently testify to the matters stated herein. The time expended preparing this Declaration is  
8 not included.

9 2. I have reviewed the Court’s October 31, 2014 Order Appointing Interim Lead Class  
10 Counsel (Dkt. 319) (“Order”), including in particular the Order’s provisions regarding fees, costs  
11 and expenses. The Firm has adhered to those provisions.

12 3. During the pendency of the litigation, Meredith & Associates, acted as class counsel  
13 to IPPs. Meredith & Associates has prosecuted this litigation solely on a contingent-fee basis, and  
14 has been at risk that it would not receive any compensation for prosecuting claims against the  
15 defendants. While Meredith & Associates devoted its time and resources to this matter, it has  
16 foregone other legal work for which it would have been compensated.

17 4. During the course of this litigation, Meredith & Associates has been involved in the  
18 following activities on behalf of IPPs at the request and under the direction of Lead Counsel:  
19 Representing putative class representatives, in Florida and California, including responding to  
20 discovery requests by defendants; taking depositions of defendants’ executives and various other  
21 tasks assigned by lead counsel.

22 5. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at  
23 historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time  
24 spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours  
25 spent by Meredith & Associates during this period of time was 1,142.90, with a corresponding  
26 historical lodestar of \$568,972.00. This summary was prepared from contemporaneous, daily time  
27 records regularly prepared and maintained by Meredith & Associates. The lodestar amount  
28

1 reflected in Exhibit A is for work assigned by Lead Counsel, and was performed by professional  
2 staff at my law firm for the benefit of the IPP Class.

3 6. All of the services performed by Meredith & Associates in connection with this  
4 litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary  
5 duplication of services for which Meredith & Associates now seeks compensation. The lodestar  
6 calculations exclude time spent reading or reviewing work prepared by others or other information  
7 relating to the case unless related to preparation for or work on a matter specifically assigned to  
8 Meredith & Associates by Lead Counsel. The hourly rates for the attorneys and professional  
9 support staff in my firm included in Exhibit A are the usual and customary hourly rates charged by  
10 Meredith & Associates.

11 7. Meredith & Associates has expended a total of \$61,658.31 in unreimbursed costs  
12 and expenses in connection with the prosecution of this litigation from November 1, 2014 through  
13 September 30, 2016. These costs and expenses are broken down in the chart attached hereto as  
14 **Exhibit B**. They were incurred on behalf of IPPs by Meredith & Associates on a contingent basis  
15 and have not been reimbursed. The expenses incurred in this action are reflected on the books and  
16 records of my firm. These books and records are prepared from expense vouchers, check records  
17 and other source materials and represent an accurate recordation of the expenses incurred. Expense  
18 documentation has been provided to Lead Counsel for review.

19 8. 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 to the best of my  
21 knowledge.

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

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25 Executed on May 12, 2017, at Philadelphia, PA

26  
27 /s/ Joel C. Meredith  
Joel C. Meredith

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**ATTESTATION**

I, Steven N. Williams, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from the signatory hereto.

By: /s/ Steven N. Williams  
Steven N. Williams



*In re Capacitors Antitrust Litigation*  
Case No. 14-cv-03264-JD

**EXHIBIT B**

Meredith & Associates

Expenses Incurred

November 1, 2014 – September 30, 2016

<b>EXPENSE CATEGORY</b>	<b>AMOUNT INCURRED</b>
Assessments	\$50,000.00
Court Costs / Filing Fees	\$610.00
Experts / Consultants	\$0.00
Federal Express / UPS / Ontrac	\$62.09
Postage / U.S. Mail	\$0.00
Service of Process	\$0.00
Messenger / Delivery	\$0.00
Hearing Transcripts	\$0.00
Investigation	\$0.00
Lexis / Westlaw	\$0.00
Photocopies – In House	\$1,116.50
Photocopies – Outside	\$4.74
Telephone / Telecopier	\$0.00
Travel – Transportation	\$8,009.02
Travel - Hotels	\$1,719.99
Travel – Meals	\$135.97
<b>TOTAL:</b>	\$61,658.31