

1 Sharon S. Almonrode  
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5 (248) 841-2200

6 *Class Counsel for Indirect Purchaser Plaintiffs*

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

10 **IN RE: CAPACITORS ANTITRUST**  
11 **LITIGATION**

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

**DECLARATION OF SHARON S.**  
**ALMONRODE IN SUPPORT OF CLASS**  
**COUNSEL’S APPLICATION FOR**  
**ATTORNEYS’ FEES AND**  
**REIMBURSEMENT OF EXPENSES**  
**SUBMITTED ON BEHALF OF THE**  
**MILLER LAW FIRM, P.C.**

12 **THIS DOCUMENT RELATES TO:**  
13 **ALL INDIRECT PURCHASER ACTIONS**

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

Judge: Hon. James Donato

1 I, Sharon S. Almonrode, declare and state as follows:

2 1. I am a Partner of The Miller Law Firm, P.C, Counsel for Indirect Purchaser  
3 Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of Class  
4 Counsel’s interim application for attorneys’ fees and reimbursement of expenses reasonably  
5 incurred in connection with the services rendered in this litigation on behalf of the class. I make  
6 this 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, The Miller Law Firm, P.C, acted as class  
13 counsel to IPPs. The Miller Law Firm, P.C. has prosecuted this litigation solely on a contingent-  
14 fee basis, and has been at risk that it would not receive any compensation for prosecuting claims  
15 against the defendants. While The Miller Law Firm, P.C. devoted its time and resources to this  
16 matter, it has foregone other legal work for which it would have been compensated.

17 4. During the course of this litigation, The Miller Law Firm, P.C. has been involved in  
18 the following activities on behalf of IPPs at the request and under the direction of Lead Counsel:

19 We have participated in the extensive discovery that has been produced in this case,  
20 including discovery of Angstrom, Inc. and defendants. That includes responding to  
21 document requests, requests for admissions and interrogatories. We conducted  
22 investigation related to the purchases made by plaintiff for purposes of discovery. We  
23 conducted meetings and reviews at the client’s facilities. We analyzed data related to the  
24 plaintiff’s claims. We conducted a 30(b)(6) deposition of one of the defendant’s employees.

25 5. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at  
26 historical rates, from November 1, 2014 through September 30, 2016. This period reflects the time  
27 spent after the appointment of Interim Lead Counsel in this litigation. The total number of hours  
28 spent by The Miller Law Firm, P.C. during this period of time was 580, with a corresponding  
historical lodestar of \$374,688.50. This summary was prepared from contemporaneous, daily time

1 records regularly prepared and maintained by The Miller Law Firm, P.C. The lodestar amount  
2 reflected in Exhibit A is for work assigned by Lead Counsel, and was performed by professional  
3 staff at my law firm for the benefit of the IPP Class.

4           6. All of the services performed by The Miller Law Firm, P.C. in connection with this  
5 litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary  
6 duplication of services for which The Miller Law Firm, P.C. now seeks compensation. The lodestar  
7 calculations exclude time spent reading or reviewing work prepared by others or other information  
8 relating to the case unless related to preparation for or work on a matter specifically assigned to  
9 The Miller Law Firm, P.C. by Lead Counsel. The hourly rates for the attorneys and professional  
10 support staff in my firm included in Exhibit A are the usual and customary hourly rates charged by  
11 The Miller Law Firm, P.C. for its services in similar contingent antitrust class action matters for the  
12 period submitted.

13           7. The Miller Law Firm, P.C. has expended a total of \$155,035.04 in unreimbursed  
14 costs and expenses in connection with the prosecution of this litigation from November 1, 2014  
15 through September 30, 2016. These costs and expenses are broken down in the chart attached  
16 hereto as **Exhibit B**. They were incurred on behalf of IPPs by The Miller Law Firm, P.C. on a  
17 contingent basis and have not been reimbursed. The expenses incurred in this action are reflected  
18 on the books and records of my firm. These books and records are prepared from expense  
19 vouchers, check records and other source materials and represent an accurate recordation of the  
20 expenses incurred. Expense documentation has been provided to Lead Counsel for review.

21           8. I have reviewed the time and expenses reported by my firm in this case which are  
22 included in this declaration, and I affirm that they are true and accurate to the best of my  
23 knowledge.

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

26 Executed on May 12, 2017 at Rochester, MI.

27 /s/ Sharon S. Almonrode  
Sharon S. Almonrode

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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 A**

The Miller Law Firm, P.C.

Hours Reported and Lodestar on a Historical Basis

November 1, 2014 – September 30, 2016

<b>Timekeeper</b>	<b>Professional Status</b>	<b>Hours</b>	<b>Rate</b>	<b>Total Lodestar</b>
E. Powell Miller	P	15.90	\$980.00	\$15,582.00
Sharon S. Almonrode	P	178.20	\$945.00	\$168,399.00
Jayson E. Blake	P	3.20	\$690.00	\$2,208.00
Devon P. Allard	A	127.70	\$565.00	\$72,150.50
Rick L. Merpi	A	1.00	\$495.00	\$495.00
Mahde Y. Abdallah	A	3.20	\$315.00	\$1,008.00
Rick A. Decker	A	0.50	\$465.00	\$232.50
Mariell R. McLatcher	A	100.90	\$465.00	\$46,918.50
Steven M. Zehnder	A	90.20	\$465.00	\$41,943.00
Daimeon M. Cotton	A	59.20	\$435.00	\$25,752.00
<b>Grand Total:</b>		<b>580.00</b>		<b>\$374,688.50</b>

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

**EXHIBIT B**

The Miller Law Firm, P.C.

Expenses Incurred

November 1, 2014 – September 30, 2016

<b>EXPENSE CATEGORY</b>	<b>AMOUNT INCURRED</b>
Assessments	\$150,000.00
Court Costs / Filing Fees	\$646.00
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$
Postage / U.S. Mail	\$
Service of Process	\$
Messenger / Delivery	\$75.00
Hearing Transcripts	\$
Investigation	\$
Lexis / Westlaw	\$44.88
Photocopies – In House	\$2,017.55
Photocopies – Outside	\$
Telephone / Telecopier	\$
Travel – Transportation	\$1601.57
Travel - Hotels	\$458.99
Travel – Meals	\$191.05
<b>TOTAL:</b>	\$155,035.04