

1 **THE MILLER LAW FIRM, P.C.**
2 **950 W. University Drive, Suite 300**
3 **Rochester, MI 48307**
4 **(248) 841-2200**

5 *Class Counsel for Indirect Purchaser Plaintiffs*

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

9
10 **IN RE: CAPACITORS ANTITRUST**
11 **LITIGATION**

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

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.

Date: October 18, 2018
Time: 10:00 a.m.
Place: Courtroom 11, 19th 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 indirect
6 purchaser classes. I make this declaration based on my personal knowledge and if called as a
7 witness, I could and would competently testify to the matters stated herein.

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

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

16 4. During the course of this litigation, The Miller Law Firm, P.C. has been involved in
17 the following activities on behalf of IPPs at the request and under the direction of IPP Lead
18 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
24 the plaintiff’s claims. We have conducted depositions of Defendants’ witnesses. We
25 prepared Angstrom’s President for deposition and attended deposition. We have
26 reviewed Japanese language documents and prepared memoranda regarding same.

27 5. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at
28 historical rates, from October 1, 2016 through March 31, 2018. The total number of hours spent by
The Miller Law Firm, P.C. during this period of time was 694.50, with a corresponding historical
lodestar of \$344,025.50. This summary was prepared from contemporaneous, daily time records

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

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 \$76,877.85 in unreimbursed
14 costs and expenses in connection with the prosecution of this litigation from October 1, 2016
15 through March 31, 2018. These costs and expenses are broken down in the chart attached hereto as
16 **Exhibit B**. They were incurred on behalf of IPPs by The Miller Law Firm, P.C. on a contingent
17 basis and have not been reimbursed. The expenses incurred in this action are reflected on the books
18 and records of my firm. These books and records are prepared from expense vouchers, check
19 records and other source materials and represent an accurate recordation of the expenses incurred.
20 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.

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Executed on July 18, 2018 at Rochester, Michigan.

/s/ Sharon S. Almonrode
Sharon S. Almonrode

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ATTESTATION

I, Adam J. Zapala, 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/ Adam J. Zapala
Adam J. Zapala

EXHIBIT A

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

October 1, 2016 – March 31, 2018

Timekeeper	Professional Status	Hours	Rate	Total Lodestar
E. Powell Miller	Partner	2.50	\$980.00	\$2,450.00
Sharon S. Almonrode	Partner	98.30	\$945.00	\$92,893.50
Devon P. Allard (10/1/16-12/31/2017)	Partner	147.50	\$565.00	\$83,337.50
Devon P. Allard (1/1/2018-3/31/18)	Partner	8.20	\$650.00	\$5,330.00
Rick L. Merpi	Associate	.50	\$495.00	\$247.50
Mahde Y. Abdallah	Associate	9.70	\$315.00	\$3,055.50
Rick A. Decker	Associate	.20	\$465.00	\$93.00
Denirro D. Lazar	Associate	62.20	\$295.00	\$18,349.00
January A. Dragich	Associate	5.40	\$525.00	\$2,835.00
M. Ryan Jarnagin	Associate	18.80	\$495.00	\$9,306.00
Mariell R. McLatcher	Associate	23.30	\$465.00	\$10,834.50
Steven M. Zehnder	Associate	2.50	\$465.00	\$1,162.50
Lowell D. Johnson	Associate	18.20	\$495.00	\$9,009.00
Daimeon M. Cotton	Associate	21.30	\$435.00	\$9,265.50
Kurt J. Parker	Associate	6.60	\$295.00	\$1,947.00
Catherine A. Nasr	Associate	1.50	\$295.00	\$442.50
Clifford Bernstein	Attorney	266.30	\$350.00	\$93,205.00
Danelle J. Vanderbeke	Paralegal	1.5	\$175.00	\$262.50
Grand Total:		694.50		\$344,025.50

EXHIBIT B

In re Capacitors Antitrust Litigation

Case No. 14-cv-03264-JD

The Miller Law Firm, P.C.

Expenses Incurred

October 1, 2016 – March 31, 2018

EXPENSE CATEGORY	AMOUNT INCURRED
Assessments	\$75,000.00
Court Costs / Filing Fees	\$
Experts / Consultants	\$
Federal Express / UPS / Ontrac	\$
Postage / U.S. Mail	\$
Service of Process	\$
Messenger / Delivery	\$
Hearing Transcripts	\$
Investigation	\$
Lexis / Westlaw	\$
Photocopies – In House	\$1,456.50
Photocopies – Outside	\$
Telephone / Telecopier	\$
Travel – Transportation	\$327.00
Travel - Hotels	\$94.35
Travel – Meals	\$
TOTAL:	\$76,877.85