

# **EXHIBIT C**

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7 *Interim Lead Counsel for the Putative Indirect Purchaser Classes*

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 9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**  
 11 **SAN FRANCISCO DIVISION**

12 **IN RE CAPACITORS ANTITRUST**  
 13 **LITIGATION**

**MDL No. 3:17-md-02801-JD**  
**Case No. 3:14-cv-03264-JD**

14 **This Documents Relates to:**  
 15 **ALL INDIRECT PURCHASER ACTIONS**

**DECLARATION OF GILVAN**  
**ANGELINI IN SUPPORT OF INDIRECT**  
**PURCHASER PLAINTIFFS' NOTICE OF**  
**MOTION AND MOTION FOR**  
**ATTORNEYS' FEES, EXPENSES, AND**  
**SERVICE AWARDS**

1 I, Gilvan Angelini, declare as follows:

2 1. I am an individual over the age of 18. I am the President of AGS Devices Co. and  
3 AGS Devices, Ltd., one of the class representatives for the Indirect Purchaser Plaintiffs (“IPP’s”)  
4 in the above-entitled action. I have been authorized to provide this declaration on behalf of AGS  
5 Devices Co. and AGS Devices, Ltd.

6 1. I am a class representative in *In re Capacitors Antitrust Litigation*, MDL No. 3:17-  
7 md-02801-JD, Case No. 3:14-cv-03264-JD, filed in the United States District Court for the Northern  
8 District of California. I submit this Declaration on behalf of myself and the classes in support of  
9 Indirect Purchaser Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Service Awards in  
10 connection with the proposed settlements with Elna Corporation, Ltd. and Elna America, Inc.  
11 (“Elna”), Matsuo Electric Corporation, Ltd. (“Matsuo”), Nichicon Corporation and Nichicon  
12 America Corporation (“Nichicon”), and Panasonic Corporation (“Panasonic”).

13 2. To pursue this matter effectively, I hired lawyers with extensive experience litigating  
14 antitrust class actions. Prior to serving as a class representative, I was not asked to condition, nor did  
15 I condition, my participation upon receiving a service award. Additionally, I was not asked to  
16 condition, nor did I condition, my approval of any of the proposed settlements upon the promise or  
17 expectation of receiving a service award.

18 3. As a class representative, I understand that it is my responsibility to be informed  
19 about the work performed by my attorneys in the above-captioned litigation (“Action”) and make my  
20 own judgment about the fairness of any settlement proposed by the attorneys.

21 4. I also understand that in evaluating the fairness of the settlements, I am required to  
22 consider the interests of all class members as well as my own.

23 5. Over the past 4 years, I have diligently performed my duties as a Class  
24 Representative to assist Class Counsel in prosecuting this Action, investing significant time and  
25 effort to fulfill my role. To that end, I have read the complaints filed, including the operative  
26 complaint on file, and generally understand the nature of the claims asserted as well as the bases  
27 for them. Throughout this Action, I have remained informed about the status of the litigation by  
28 communicating with my attorneys about litigation strategies, reviewing periodic updates from

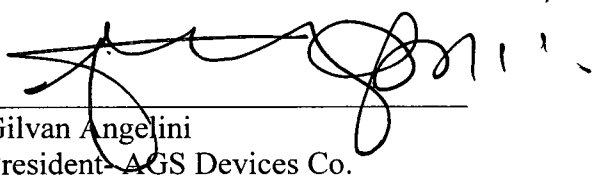
1 Class Counsel, and becoming apprised of key case documents. Since the outset of the Action, I  
2 have also diligently retained all papers or electronic information that could be relevant to the  
3 litigation and provided these to my attorneys.

4 6. Throughout the Action, I have also assisted in responding to discovery. This  
5 included reviewing discovery requests from Defendants, discussing them with Class Counsel,  
6 reviewing proposed responses, making any corrections, and signing off on the responses. I also  
7 spent a significant amount of time locating purchase receipts and the other documents requested by  
8 the Defendants in this Action.

9 7. I have also contributed to the discovery process by preparing and sitting for a  
10 deposition. In total, my deposition lasted 4 hours and 55 minutes of record time, where I was  
11 questioned by counsel in this Action. To ensure the accuracy of my transcript, I spent 2 hours  
12 reviewing it for errors.

13 8. In total, I estimate that I have spent approximately 35 hours performing all the  
14 above-described duties on behalf of the classes over the past 4 years. My attorneys have not made  
15 any promises regarding compensation for my service, and I willingly agreed to participate in this  
16 Action with no guarantee of personal benefit. I believe that the time, effort, and information I  
17 provided helped to make the settlements possible and therefore ask that the Court approve my  
18 service award in the amount of \$5,000. I believe such an award is reasonable considering the  
19 assistance provided and poses no risk of undermining my ability to adequately represent the  
20 Classes.

21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct. Executed October 24<sup>th</sup>, 2019, in [Bonita Springs, FL].

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25 Gilvan Angelini  
26 President, AGS Devices Co.  
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