

EXHIBIT E

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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 JORGE VALDES IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR ATTORNEYS'
FEES, EXPENSES, AND SERVICE
AWARDS

1 I, Jorge Valdes, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am the owner of J&O Electronics, one of the class representatives for the Indirect
5 Purchaser Plaintiffs (“IPPs”) in the above-captioned litigation (“Action”). I have been authorized to
6 provide this Declaration on behalf of J&O Electronics.

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

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

19 5. As a class representative, I understand that it is my responsibility to be informed about
20 the work performed by my attorneys in the Action and make my own judgment about the fairness of
21 any settlement proposed by the attorneys.

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

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

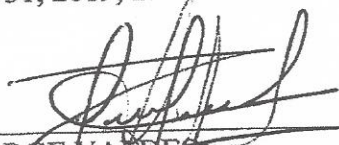
1 communicating with my attorneys about litigation strategies, reviewing periodic updates from
2 Class Counsel, and becoming apprised of key case documents. Since the outset of the Action, I
3 have also diligently retained all papers or electronic information that could be relevant to the
4 litigation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

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

10 9. I have also contributed to the discovery process by preparing and sitting for a
11 deposition. In total, my deposition lasted 5 hours and 40 minutes of record time, where I was
12 questioned by counsel in this Action. To ensure the accuracy of my transcript, I spent 2 hours
13 reviewing it for errors.

14 10. In total, I estimate that I have spent approximately 45 hours performing all the
15 above-described duties on behalf of the classes over the past 4 years. My attorneys have not made
16 any promises regarding compensation for my service, and I willingly agreed to participate in this
17 Action with no guarantee of personal benefit. I believe that the time, effort, and information I
18 provided helped to make the settlements possible and therefore ask that the Court approve my
19 service award in the amount of \$5,000. I believe such an award is reasonable considering the
20 assistance provided and poses no risk of undermining my ability to adequately represent the
21 Classes.

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 October 31, 2019, in Florida.

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26 JORGE VALDES
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