

1 Guido Saveri (22349)
 R. Alexander Saveri (173102)
 2 Cadio Zirpoli (179108)
SAVERI & SAVERI, INC.
 3 706 Sansome Street
 San Francisco, California 94111
 4 Telephone: (415) 217-6810
 Facsimile: (415) 217-6813
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 6 *Chairman of the Executive Committee*
for the Direct Purchaser Plaintiffs

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

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 12 IN RE: OPTICAL DISK DRIVE
 ANTITRUST LITIGATION

Case No. 3:10-md-2143-RS
 MDL No. 2143

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 14 This Document Relates to:
 15 ALL DIRECT PURCHASER CLASS
 ACTIONS

**DECLARATION OF ALLAN STEYER IN
 SUPPORT OF MOTION FOR ATTORNEYS'
 FEES, REIMBURSEMENT OF EXPENSES,
 AND INCENTIVE AWARDS**

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1 I, Allan Steyer, declare and state as follows:

2 1. I am a partner of the law firm of Steyer Lowenthal Boodrookas Alvarez & Smith
3 LLP. I submit this declaration in support of Direct Purchaser Plaintiffs' joint application for an
4 award of attorneys' fees, expenses, and incentive awards in connection with the services rendered
5 in this litigation. I make this Declaration based on my own personal knowledge, and if called as a
6 witness, I could and would competently testify to the matters stated herein.

7 2. My firm has served as counsel to JLK Systems Group, Inc. and as counsel for the
8 Direct Purchaser Class ("Class") throughout the course of this litigation. My firm's curriculum
9 vitae was previously submitted to the Court in connection with Direct Purchaser Plaintiffs' prior
10 motion for an award of attorneys' fees, reimbursement of expenses and class representative
11 incentive awards on March 16, 2015 (Prior Request for Attorneys' Fees") (Dkt. No. 1535).

12 3. Steyer Lowenthal Boodrookas Alvarez & Smith LLP has prosecuted this litigation
13 solely on a contingent-fee basis, and has been at risk that it would not receive any compensation
14 for prosecuting claims against the Defendants. While Steyer Lowenthal Boodrookas Alvarez &
15 Smith LLP devoted its time and resources to this matter, it has foregone other legal work for which
16 it would have been compensated.

17 4. During the pendency of the litigation, Steyer Lowenthal Boodrookas Alvarez & Smith
18 LLP performed the following work: We incorporate herein our description of work performed
19 during the period May 7, 2010 through December 31, 2014 as stated in our Declaration previously
20 filed with the Court. During the time period January 1, 2015 through November 3, 2015 we
21 performed the following work:

- 22 (1) research, draft, and edit renewed class certification motion;
- 23 (2) work with expert regarding renewed class certification motion including review of
24 expert reports and deposition testimony;
- 25 (3) document review in connection with the renewed class certification motion;
- 26 (4) legal research regarding settlement offsets;
- 27 (5) attend case management conference; and

1 (6) confer with co-counsel regarding litigation strategy.

2 5. Attached hereto as Exhibit 1 is my firm's hours and lodestar, computed at historical
3 rates, for the period of January 1, 2015 through November 3, 2015. This period does not reflect
4 any time spent previously submitted to the Court in connection with the Prior Request for Attorneys'
5 Fees in this litigation. The total number of hours spent by Steyer Lowenthal Boodrookas Alvarez
6 & Smith LLP during this period of time was 369.25 hours, with a corresponding lodestar of
7 \$181,175.00. This summary was prepared from contemporaneous, daily time records regularly
8 prepared and maintained by my firm. The lodestar amount reflected in Exhibit 1 is for work
9 assigned by the Chairman of the Executive Committee, and was performed by professional staff
10 at my law firm for the benefit of the Class.

11 6. The hourly rates for the attorneys and professional support staff in my firm
12 included in Exhibit 1 are the usual and customary hourly rates charged by Steyer Lowenthal
13 Boodrookas Alvarez & Smith LLP for their services in similar complex litigation.

14 7. My firm has expended a total of \$1,533.40 in unreimbursed costs and expenses in
15 connection with the prosecution of this litigation from January 1, 2015 to the present. None of the
16 costs reflected in Exhibit 2 have been previously submitted to the Court for reimbursement in
17 connection with the Prior Request for Attorneys' Fees in this matter. These costs and expenses are
18 broken down in the chart attached hereto as Exhibit 2. They were incurred on behalf of the Class
19 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
20 action are reflected on the books and records of my firm. These books and records are prepared
21 from expense vouchers, check records and other source materials and represent an accurate
22 recordation of the expenses incurred.

23 8. The law firm of Steyer Lowenthal Boodrookas Alvarez & Smith LLP paid
24 \$5,000.00 in assessments for the joint prosecution of the litigation against the Defendants after the
25 Prior Request for Attorneys' Fees. This assessment was not included in the previous Declaration
26 submitted to the Court in connection to the Prior Request for Attorneys' Fees.

27 9. I have reviewed the time and expenses reported by my firm in this case which are
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1 included in this declaration, and I affirm that they are true and accurate.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct. Executed on this 19th day of January 2016 at San Francisco,
4 California.



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ALLAN STEYER

EXHIBIT 1

In re Optical Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS
STEYER LOWENTHAL BOODROOKAS ALVAREZ & SMITH LLP
 Reported Hours and Lodestar
 January 1, 2015 through November 3, 2015

TIME REPORT

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS			
Allan Steyer (P)	116.50	\$880	\$102,520.00
D. Scott Macrae (A)	31.50	\$810	\$25,515.00
Alexander D. Kullar (A)	23.25	\$440	\$10,230.00
Gabriel D. Zeldin (A)	21.50	\$395	\$8,492.50
NON-ATTORNEYS			
Thomas J. Lloyd (LC)	176.50	\$195	\$34,417.50
TOTAL:	369.25		\$181,175.00

(P) Partner
 (OC) Of Counsel
 (A) Associate
 (PL) Paralegal
 (LC) Law Clerk

EXHIBIT 2

In re Optical Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS
STEYER LOWENTHAL BOODROOKAS ALVAREZ & SMITH LLP
 Reported Unreimbursed Expenses Incurred on Behalf of Direct Purchaser Class
 January 1, 2015 through November 3, 2015

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	0.00
Experts/Consultants	0.00
Federal Express	50.55
Transcripts (Hearing, Deposition, etc.)	0.00
Computer Research	1,024.10
Messenger Delivery	0.00
Photocopies – In House	31.20
Photocopies – Outside	0.00
Postage	0.00
Service of Process	0.00
Telephone/Telecopier	2.74
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	424.81
TOTAL:	\$1,533.40