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6 *Chairman of the Executive Committee*
 7 *for the Direct Purchaser Plaintiffs*

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

12
 13 IN RE: OPTICAL DISK DRIVE
 14 ANTITRUST LITIGATION

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

15 This Document Relates to:
 16 ALL DIRECT PURCHASER CLASS
 17 ACTIONS

**DECLARATION OF WILLIAM H.
 LONDON IN SUPPORT OF MOTION
 FOR ATTORNEYS' FEES,
 REIMBURSEMENT OF EXPENSES, AND
 INCENTIVE AWARDS**

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1 I, William H. London, declare and state as follows:

2 1. I am a Principal of the law firm of Freed Kanner London & Millen LLC
3 (“FKLM”). I submit this declaration in support of Direct Purchaser Plaintiffs’ (“DPPs”) joint
4 application for an award of attorneys’ fees, expenses, and incentive awards in connection with the
5 services rendered in this litigation. I make this Declaration based on my own personal knowledge,
6 and if called as a witness, I could and would competently testify to the matters stated herein.

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

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

16 4. During the pendency of the litigation, FKLM performed the following work at the
17 express direction of the Executive Committee: Conferred with the Executive Committee in the
18 formulation of strategy relating to the recent mediation efforts.

19 5. Attached hereto as Exhibit 1 is my firm’s hours and lodestar, computed at historical
20 rates, for the period of January 1, 2015 through October 31, 2015. This period does not reflect any
21 time previously submitted to the Court in connection with the Prior Request for Attorneys’ Fees in
22 this litigation. The total number of hours spent by FKLM during this period of time was 2.4 hours,
23 with a corresponding lodestar of \$1,638.00. This summary was prepared from contemporaneous,
24 daily time records regularly prepared and maintained by my firm. The lodestar amount reflected in
25 Exhibit 1 is for work assigned by the Chairman of the Executive Committee, and was performed
26 by professional staff at my law firm for the benefit of the Class.

27 6. The hourly rates for the attorneys and professional support staff in my firm

1 included in Exhibit I are the usual and customary historical hourly rates charged by FKLM.

2 7. My firm has expended a total of zero dollars in unreimbursed costs and expenses in
3 connection with the prosecution of this litigation from January 1, 2015 to the present.

4 8. FKLM paid \$5,000.00 in assessments for the joint prosecution of the litigation
5 against the Defendants after the Prior Request for Attorneys' Fees. This assessment was not
6 included in the previous Declaration submitted to the Court in connection to the Prior Request for
7 Attorneys' Fees.

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

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct. Executed on this 24th day of November, 2015 at Bannockburn,
12 Illinois.

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14 _____
15 WILLIAM H. LONDON
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EXHIBIT 1

EXHIBIT 1

In re Optical Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS
FREED KANNER LONDON & MILLEN LLC
 Reported Hours and Lodestar
 January 1, 2015 through November 3, 2015

TIME REPORT

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS			
William H. London (P)	.10	\$690	\$69.00
Douglas A. Millen (P)	.50	\$690	\$345.00
Douglas A. Millen (P)	1.80	\$680	\$1,224.00
TOTAL:	2.40		\$1,638.00

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

EXHIBIT 2

EXHIBIT 2

In re Optical Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS
FREED KANNER LONDON & MILLEN LLC
 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.)	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Computer Research	
Messenger Delivery	
Photocopies – In House	
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	
TOTAL:	\$0.00