

1 Guido Saveri (22349)  
 2 R. Alexander Saveri (173102)  
 3 Cadio Zirpoli (179108)  
 4 **SAVERI & SAVERI, INC.**  
 5 706 Sansome Street  
 San Francisco, California 94111  
 Telephone: (415) 217-6810  
 Facsimile: (415) 217-6813

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 G.  
 CALDES IN SUPPORT OF MOTION  
 FOR ATTORNEYS' FEES,  
 REIMBURSEMENT OF EXPENSES, AND  
 INCENTIVE AWARDS**

18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 I, William G. Caldes, declare and state as follows:

2 1. I am a Partner of the law firm of Spector Roseman Kodroff & Willis, P. C. I  
3 submit this declaration in support of Direct Purchaser Plaintiffs' ("DPPs") 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. Spector Roseman Kodroff & Willis, P. C. has prosecuted this litigation solely on a  
13 contingent-fee basis, and has been at risk that it would not receive any compensation for  
14 prosecuting claims against the Defendants. While Spector Roseman Kodroff & Willis, P. C.  
15 devoted its time and resources to this matter, it has foregone other legal work for which it would  
16 have been compensated.

17 4. During the pendency of the litigation, SRKW attorneys and support staff  
18 performed the following work at the direction of lead counsel: SRKW met with and corresponded  
19 with lead counsel concerning the status and strategy for litigating this matter. SRKW was  
20 appointed by lead counsel to be responsible for all Class Plaintiff discovery issues relating to  
21 defendant Quanta. This entailed meeting, conferring and corresponding with Quanta in regards to  
22 all discovery issues including Quanta's responses to Class Plaintiffs' interrogatories and Class  
23 Plaintiffs' request for production of documents. SRKW negotiated 30(b)(6) depositions with  
24 Quanta and Quanta's production of transactional data. SRKW reviewed Quanta's transactional  
25 data and drafted related motions to compel. SRKW performed foreign language document review  
26 and coding for all defendants. SRKW performed research, including the affects of recent court  
27 decisions on this litigation. SRKW also contributed to the drafting of Class Plaintiffs' Opposition

1 to defendants' Motion to Dismiss the Consolidated Amended Complaint and defendants' later  
2 Motion to Dismiss Class Plaintiffs' Second Consolidated Amended Complaint.

3 5. For the period of January 1, 2015 through November 3, 2015 we did not have any  
4 time to report.

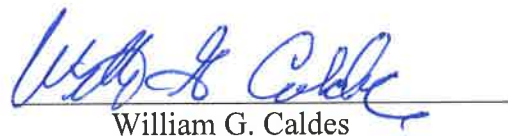
5 6. The hourly rates for the attorneys and professional support staff in my firm are the  
6 usual and customary hourly rates charged by Spector Roseman Kodroff & Willis, P. C.

7 7. My firm has not expended unreimbursed costs and expenses in connection with the  
8 prosecution of this litigation from January 1, 2015 to the present.

9 8. The Spector Roseman Kodroff & Willis, P. C. paid \$5,000.00 in assessments for  
10 the joint prosecution of the litigation against the Defendants after the Prior Request for Attorneys'  
11 Fees. This assessment was not included in the previous Declaration submitted to the Court in  
12 connection to the Prior Request for Attorneys' Fees.

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

15 I declare under penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct. Executed on this 20th day of November, 2015 at Philadelphia,  
17 Pennsylvania.

18   
19 William G. Caldes

20  
21  
22  
23  
24  
25  
26  
27  
28