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 9 *Chairman of the Executive Committee*
 10 *for the Direct Purchaser Plaintiffs*

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14 IN RE: OPTICAL DISK DRIVE
 15 ANTITRUST LITIGATION

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

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

**DECLARATION OF W. JOSEPH
 BRUCKNER IN SUPPORT OF MOTION
 FOR ATTORNEYS' FEES,
 REIMBURSEMENT OF EXPENSES, AND
 INCENTIVE AWARDS**

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1 I, W. Joseph Bruckner, declare and state as follows:

2 1. I am a partner of the law firm of Lockridge Grindal Nauen P.L.L.P. I submit this
3 declaration in support of Direct Purchaser Plaintiffs' ("DPPs") joint application for an award of
4 attorneys' fees, expenses, and incentive awards in connection with the services rendered in this
5 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 L. E. Hoover Co. and as counsel for the Direct
8 Purchaser Class ("Class") throughout the course of this litigation. My firm's curriculum vitae was
9 previously submitted to the Court in connection with Direct Purchaser Plaintiffs' prior motion for
10 an award of attorneys' fees, reimbursement of expenses and class representative incentive awards
11 on March 16, 2015 (Prior Request for Attorneys' Fees"). (Dkt. No. 1535).

12 3. Lockridge Grindal Nauen P.L.L.P. 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 Lockridge Grindal Nauen P.L.L.P. devoted its
15 time and resources to this matter, it has foregone other legal work for which it would have been
16 compensated.

17 4. During the pendency of the litigation, Lockridge Grindal Nauen P.L.L.P performed
18 the following work:

- 19 • Consulted with Co-Lead Counsel regarding appeal, case progress and status;
20 • Reviewed and monitored case filings and communications with Co-Lead Counsel.

21 5. Attached hereto as Exhibit 1 is my firm's hours and lodestar, computed at historical
22 rates, for the period of January 1, 2015 through November 3, 2015. This period does not reflect
23 any time previously submitted to the Court in connection with the Prior Request for Attorneys'
24 Fees in this litigation. The total number of hours spent by Lockridge Grindal Nauen P.L.L.P.
25 during this period of time was 12.25, with a corresponding lodestar of \$6,331.25. This summary
26 was prepared from contemporaneous, daily time records regularly prepared and maintained by my
27 firm. The lodestar amount reflected in Exhibit 1 is for work assigned by the Chairman of the

1 Executive Committee, and was performed by professional staff at my law firm for the benefit of
2 the Class.

3 6. The hourly rates for the attorneys and professional support staff in my firm
4 included in Exhibit 1 are the usual and customary hourly rates charged by Lockridge Grindal
5 Nauen P.L.L.P.

6 7. My firm has expended a total of \$24.00 in unreimbursed costs and expenses in
7 connection with the prosecution of this litigation from January 1, 2015 to the present. None of the
8 costs reflected in Exhibit 2 have been previously submitted to the Court for reimbursement in
9 connection with the Prior Request for Attorneys' Fees in this matter. These costs and expenses are
10 broken down in the chart attached hereto as Exhibit 2. They were incurred on behalf of the Class
11 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
12 action are reflected on the books and records of my firm. These books and records are prepared
13 from expense vouchers, check records and other source materials and represent an accurate
14 recordation of the expenses incurred.

15 8. Lockridge Grindal Nauen P.L.L.P. paid \$5,000.00 in assessments for the joint
16 prosecution of the litigation against the Defendants after the Prior Request for Attorneys' Fees.
17 This assessment was not included in the previous Declaration submitted to the Court in connection
18 to the Prior Request for Attorneys' Fees.

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

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 on this 22nd day of January, 2016 at Minneapolis,
23 Minnesota.


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25 
26 W. Joseph Bruckner

EXHIBIT 1

Exhibit 1				
In re Opitcal Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS				
Lockridge Grindal Nauen P.L.L.P.				
Reported Hours and Lodestar				
Time Period January 1, 2015 through November 3, 2015				
TIME REPORT				
Name	Title	Hours	Hourly Rate	Lodestar
Attorneys				
Richard A. Lockridge 2015 Rate	Partner	0.75	\$825.00	\$618.75
Richard A. Lockridge Subtotal	Partner	0.75		\$618.75
W. Joseph Bruckner 2015 Rate	Partner	0.50	\$800.00	\$400.00
W. Joseph Bruckner Subtotal	Partner	0.50		\$400.00
Heidi M. Silton 2015 Rate	Partner	0.50	\$725.00	\$362.50
Heidi M. Silton Subtotal	Partner	0.50		\$362.50
Elizabeth R. Odette 2015 Rate	Partner	9.50	\$500.00	\$4,750.00
Elizabeth R. Odette Subtotal	Partner	9.50		\$4,750.00
Non-Attorneys				
Elizabeth M. Sipe 2015 Rate	Paralegal	1.00	\$200.00	\$200.00
Elizabeth M. Sipe Subtotal		1.00		\$200.00
TOTALS		12.25		\$6,331.25

EXHIBIT 2

EXHIBIT 2

In re Optical Disk Drive Antitrust Litigation, Case No. 3:10-md-2143-RS
 Lockridge Grindal Nauen P.L.L.P.
 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	\$2.80
Messenger Delivery	
Photocopies – In House	\$20.70
Photocopies – Outside	
Postage	\$.48
Service of Process	
Telephone/Telecopier	\$.02
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	
TOTAL:	\$24.00