

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS	:	2:12-cv-00202
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS	:	2:12-cv-00602
RADIATORS	:	2:13-cv-01002
AUTOMOTIVE LAMPS	:	2:13-cv-01202
SWITCHES	:	2:13-cv-01302
IGNITION COILS	:	2:13-cv-01402
STEERING ANGLE SENSORS	:	2:13-cv-01602
HID BALLASTS	:	2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS	:	2:13-cv-02402
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
AIR CONDITIONING SYSTEMS	:	2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
AUTOMOTIVE HOSES	:	2:15-cv-03202
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM PRODUCTS	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
POWER WINDOW SWITCHES	:	2:16-cv-03902
AUTOMOTIVE STEEL TUBES	:	2:16-cv-04002
ACCESS MECHANISMS	:	2:16-cv-04102
SIDE DOOR LATCHES	:	2:17-cv-04302

This Document Relates to:	:	Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS	:	

**DECLARATION OF SHAWN M. RAITER IN SUPPORT OF AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES FOR ROUND FOUR SETTLEMENTS**

I, Shawn M. Raiter, declare as follows:

1. I am a partner at Larson • King, LLP and submit this declaration in support of the Auto Dealers' Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses for Round Four Settlements. I am one of the Interim Co-Lead Class Counsel appointed by the Court to represent the putative litigation and provisionally-certified settlement classes of automobile dealerships in this multi-district litigation ("Auto Dealers").

2. The Round One and Round Two payments (not including the amount held in reserve pursuant to the allocation plans) have been made to eligible Auto Dealers who submitted valid claims. Settlement payments to some class members exceeded several million dollars in the first two rounds. Counsel for the Auto Dealers expect that the payments for the Round Three settlements will be made before the Court hears the present motion.

3. The total guaranteed money recovered in Auto Dealer settlements in Round One (\$58,947,900.00), Round Two (\$124,730,927.00), Round Three (\$115,180,799.90), and Round Four (\$86,720,160.00) of this litigation is \$385,579,786.00. When the \$16,800,000.00 general, unsecured, non-priority claim in the TKH bankruptcy from the Round Four settlements is included, the amount recovered for Auto Dealers could total as much as \$402,389,786.00.

4. As of November 7, 2019, the settlement funds being held in escrow for Round Four had earned interest totaling \$1,342,403.65 and had paid taxes and tax preparation fees of \$476,367.00 for a net gain of \$866,036.65.

5. The firms representing the Auto Dealers have worked on this litigation on a contingent basis. My law firm, and the law firms representing the Auto Dealers under the direction of Interim Co-Lead Counsel for the Auto Dealers, have done so without any guarantee of being paid for their time or being reimbursed for the considerable expenses devoted in the pursuit of the cases involved in the settlements currently before the Court.

6. This is a decidedly complex litigation. There are approximately 40 Auto Dealer class representatives who are pursuing money damage claims in 30 states and the District of Columbia. There were more than 40 different cases related to different parts (or type of part) involved in bid-rigging and price-fixing conspiracies involving more than 160 Defendants.

7. Beginning in 2011, some of the attorneys working on behalf of the Auto Dealers worked full-time or nearly full-time on this litigation. It has been a huge undertaking. To-date, our Auto Dealer activities have included:

- Research and investigation of the automotive parts supply industry and the sale of new vehicles through franchised automotive dealerships;
- Collecting information from a variety of sources, including the DOJ indictments, guilty pleas, and evidence that Defendants produced;
- Extensive research on the various aspects of the antitrust and other laws of more than 30 states and the District of Columbia, and drafting and editing the initial and amended complaints;
- Analyzed and prepared liability and damages claims against more than 160 Defendants;
- Collecting and analyzing information and discovery including voluminous discovery produced by the Defendants and third parties, such as the OEMs;
- Consultation with economic and other liability and damages experts;
- Communicating and working with experts to develop appropriate damages methodologies in preparation for class certification and class-wide damages calculations for use at trial;
- Drafting and negotiating key case-management documents, protocols, and stipulations;
- Review, in conjunction with the other plaintiff groups, of millions of pages of foreign-language and translated documents produced by the Defendants;
- Receipt of cooperation materials from amnesty applicants, and attending in-person proffers from amnesty applicants who disclose the details of the conspiracies;
- Drafting, preparing for, and arguing numerous oppositions to motions to dismiss;
- Drafting and opposing numerous discovery motions, motions to quash, and other discovery sought by the Defendants from the Auto Dealers;

- Negotiating dealership and discovery issues with defense counsel including innumerable meet-and-confer sessions, each of which required substantial preparation;
- Preparing correspondence with respect to timing, stipulations, and case planning issues;
- Corresponding and attending calls with dealership co-counsel regarding client discovery and trial preparation issues;
- Obtaining and analyzing documents and data from over 40 class representative dealerships, including many in-person trips to the dealerships;
- Locating, review, redaction, and production of nearly 1 million pages of documents from class representative dealerships;
- Exchanging information and coordinating with end-payor, direct purchaser, truck and equipment dealers, City of Richmond, California, Florida, and Ford counsel regarding various issues;
- Attending calls and meetings to help formulate OFM subpoenas and discovery from third-parties;
- Responding to hundreds of discovery emails from Defendants demanding Auto Dealer discovery;
- Innumerable telephone calls with Defendants regarding Auto Dealer discovery and motion practice before the Special Master and appeals to Judge Battani;
- Exchanging information and conferring with counsel for the other Plaintiff groups regarding various discovery, procedural, and substantive issues;
- Attending MDL status conferences and motions with Judge Battani and conferences and motions with the discovery Special Master;
- Preparing for, traveling to, and attending more than 140 depositions of third-party automobile dealerships and class representative dealerships;
- Preparing for, traveling to, and attending more than 190 depositions of Defendants and their representatives;
- Preparing, through Japanese-speaking attorneys, key deposition outlines and strategy used by all Plaintiffs' groups in this litigation;
- Preparing for class certification motions by analyzing thousands of pages of depositions, thousands of pages of key discovery, working with experts, analyzing relevant case law, and drafting pleadings;

- Performing all the tasks necessary to reach more than 60 settlements, including formulating demands, negotiating, in some cases mediation, dozens of in-person meetings, exchange of drafts, preparing escrow agreements;
- Drafting settlement agreements, preliminary approval motions, and in some cases attend and argue preliminary approval motions;
- Analyzing discovery and materials received from cooperating Defendants and working with the special allocation consultant to develop allocation plans for each of the dozens of parts for which Auto Dealer settlements have been reached;
- Receiving cooperation materials from settling Defendants, attend in-person proffers from settling Defendants who disclose the details of the conspiracies, and review and analyze cooperation materials from settling Defendants and incorporate that information into the ongoing case strategy; and
- Drafting notices, claim forms, and other settlement-related documents and consult with the special allocation consultant and claims administrator

8. Both the actions of defense counsel and statements they made in status conferences and other settings in this litigation indicated that Defendants focused much of their discovery efforts on the Auto Dealers and the representative dealership plaintiffs.

9. Defendants asked the Auto Dealer class representatives to produce documents for a 14-year period that include: (1) all documents or data referring, or relating to any actual or potential term of every new vehicle-related transaction; (2) information regarding any and all costs, ranging from energy to real estate costs; (3) financing and insurance details; (4) what and how dealerships paid their employees over the course of fourteen years; (5) every negotiation for every one of the thousands of vehicles sold over the course of fourteen years; (6) all sales and margin targets for dealership salespeople; (7) all inventory management documents including but not limited to, business guidelines, handbooks, strategy presentations, and planning presentations; and (8) all salesperson training materials over the course of fourteen years. Defendants sought documents and data located on any computer, database, or back-up tape anywhere in the dealerships, as well as hard copy documents

located all over the dealerships. Counsel for the Auto Dealer had to negotiate these demands with Defendants and brought and opposed numerous discovery motions.

10. Defendants also sought documents and other electronic data from the automobile dealership class representatives, including: (1) tens of thousands of invoices documenting new car purchases; (2) hundreds of fields of dealership management system (DMS) data; (3) data from back-up media going back to 1999; (4) monthly OHM financial statements submitted by dealers to the OEMs for 15 years; and (5) documents located in OEM portals showing monetary and non-monetary incentives, promotions and rebates offered to customers purchasing new cars and showing incentives, promotions and rebates offered to the dealers and advertisements showing special offers, promotions and incentives on new car purchases advertised to customers.

11. Despite the Auto Dealers' objections, the Defendants insisted on taking an unlimited number of depositions of non-party automobile dealerships. The Court allowed the Defendants to take the depositions and more than 100 depositions of non-party Auto Dealers. Those depositions, and the depositions of the class representatives were conducted. Dozens of depositions of the Defendants and their representatives were taken in the United States and abroad.

12. The settlements before the Court total more than \$86 million for the benefit of eligible Auto Dealers. The settlements were reached after years of litigation and the settlements were negotiated by experienced counsel on both sides. The settlements were reached through lengthy negotiations of the parties, some of which took many months and involved many communications and numerous rounds of negotiation. When necessary, the parties engaged a mediators. Some of the Round Four settlements were only reached after multiple in-person negotiating sessions. In each settlement before the Court, counsel on both sides was armed with transactional data, documents produced in discovery, and a strong understanding of the claims and defenses. Counsel for the Auto

Dealers also had the benefit of cooperation materials provided by settling Defendants or amnesty applicants.

13. Because of their role as intermediate indirect purchasers, the Auto Dealers shouldered the burden of a disproportionate amount of discovery aimed at them by the Defendants. The Defendants sought discovery regarding the Auto Dealers' claims and antitrust injury and the injury claimed by the End Payors. Since the Auto Dealer class representatives run businesses and generate financial and other records that Defendants believe are relevant to damage and pass on issues, the Auto Dealers were targeted for discovery that largely related to the End Payors' claims. The Auto Dealers were the primary focus of the Defendants' discovery relating to the extent of pass on of antitrust overcharges through the indirect purchaser chain. This required a substantial amount of work by counsel for the Auto Dealers that was not directly proportional to the settlements achieved for the Auto Dealers' benefit.

14. The Court is familiar with the complexity of this litigation. For the cases at issue in the Round Four settlements, counsel for the Auto Dealers have dedicated thousands of attorney hours and hours for paralegals, law clerks, and other professionals. Interim Co-Lead Counsel for the Auto Dealers coordinated the efforts of counsel representing the Auto Dealers to maximize efficiency, minimize duplication of effort, and minimize unnecessary or duplicative billing.

15. Interim Co-Lead Counsel for the Auto Dealers directed the firms who would perform benefit work for the Auto Dealers to keep contemporaneous time and expense records and provided counsel with specific instructions regarding what time would be considered for reimbursement and how time and expense requests must be recorded. Interim Co-Lead Counsel for the Auto Dealers monitored the work of the firms working for the Auto Dealers to ensure efficiency and to avoid unauthorized and unnecessary work.

16. Because many of these cases are interrelated and involve overlapping conspiracies and common defendants, much of the work conducted by the Auto Dealers' counsel in one case provided a substantial benefit to the dealership class members in other cases.

17. Interim Co-Lead Counsel for the Auto Dealers directed the firms working for the Auto Dealers to keep their time and expense records, when possible, on a per-case / part basis for tasks that related specifically to a particular case or part. The firms also maintained "general" auto parts or "wire harness" time records for time and expense that applied to all aspects of the litigation or cases. As an example, the time and expense associated with a consulting economic expert would be kept under a general file if it related to general aspects of Defendants' illegal conduct and its economic effects. Work done to specifically analyze the damage caused in a specific part /case would be charged to that case.

18. The Declarations of Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore are submitted in support of this motion and set out the time and money spent by the firms primarily involved in the representation of the Auto Dealers.

19. Interim Co-Lead Counsel for the Auto Dealers and the firms working under their direction have invested substantial time on this litigation that they could have spent working on other matters. They invested that time for years without a guarantees that they would be paid for their work.

20. Counsel for the Auto Dealers also invested approximately \$153,720.12 of their own money to pay for unreimbursed litigation expenses to benefit the cases with settlements before the Court. These costs included experts, document review and hosting for the millions of pages produced in these cases, scanning and preparation of nearly 1 million pages of dealer documents, travel, extensive translations, and other reasonable litigation expenses. Counsel for the Auto Dealers incurred

these expenses in these cases without any guarantee of recovery and should be reimbursed from the settlement funds.

21. Interim Co-Lead Counsel for the Auto Dealers also issued assessments to the firms working working for the Auto Dealers to be used to pay certain large expenses. The Barrett Law Group has maintained that fund and representatives of that firm have submitted a separate declaration detailing the money paid into and out of that fund. The firms representing the Auto Dealers have not included those assessments in the declarations of Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore.

22. The size and complexity of this litigation requires the expenditure of significant expenses for domestic and international travel, scanning and preparation of documents for database entry, document review and database hosting of those documents, translation of foreign language documents, the retention of Japanese speaking counsel, and extensive economic expert analysis. In addition, ongoing expenses related to the hosting and retention of millions of pages of documents is a significant expense.

23. In a separate motion, Interim Co-Lead Counsel for the Auto Dealers will request that the Court allow them to set aside a portion of these settlements for potential service awards that the class representative dealerships may request in the future from the Round Four settlements. When such requests are made, motions and supporting information will be provided to the Court.

24. As set forth in the declarations of Marie Thomas, Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore submitted with this motion, counsel for the Auto Dealers have advanced **\$153,720.12** in unreimbursed litigation costs related to the cases in the settlements currently before the Court. These are reasonable litigation costs that were incurred to advance the cases involving

parts for which there were no prior settlements and therefore no future litigation funds set aside from prior settlements.

25. As set forth in the declarations of Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore, counsel for the Auto Dealers have worked for nearly eight years and have worked more than 100,624 attorney, paralegal, and professional hours in the cases with settlements currently before the Court and while doing work for the combined benefit of all Auto Dealer cases in this litigation.

26. Applying the rates customarily charged by those counsel to the hours expended yields a “lodestar” of \$64,032,447.25 through September 30, 2019 for work done related to the cases with settlements currently before the Court. For all Auto Dealer cases, the total lodestar of Auto Dealer counsel was at least \$86,502,565.17 through September 30, 2019.

27. The development, implementation, and delivery of the notice plan for the Round Four settlements and the administration of claims (if the the settlements are granted final approval) are expected to cost approximately \$350,000.00.

28. Interim Co-Lead Counsel for the Auto Dealers respectfully request a fee award equal to 30 percent of the funds available for the Round Four settlements, after the deduction of the cost of class notice and claims administration. That calculation is:

$$(\$87,586,196 - \$350,000.00) \times .30 = \$26,170,859.00.$$

29. The Court previously awarded \$76,764,245 in attorneys’ fees the first three rounds of Auto Dealer settlements.

30. The **\$26,170,859.00** fee award Interim Co-Lead Counsel for the Auto Dealers respectfully requests, when coupled with the Court’s fee awards in the first three settlement rounds, represents a multiplier of less than 1.19 of the current overall lodestar, using counsel’s current

customary rates, in the cases involved in these settlements and including the work that has been done for the combined benefit of the cases in this litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 9th day of November, 2019 St. Paul, Minnesota.

/s/ Shawn M. Raiter

Shawn M. Raiter

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
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ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :
:

**DECLARATION OF MARIE THOMAS IN SUPPORT OF AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FOR ROUND FOUR SETTLEMENTS**

I, Marie Thomas, declare as follows:

1. I am the Accounting Manager for Barrett Law Group, P.A. I submit this declaration in support of Automobile Dealers Interim Co-Lead Counsel's motion for an award of attorneys' fees in connection with the services rendered, and costs and expenses incurred, in the Round Four settlements for the cases listed above (the "Actions").

2. I have acted as treasurer of the group of attorneys representing the Automobile Dealers and in that capacity, under the direction of Interim Co-Lead Counsel for the Auto Dealers, have maintained and administered a litigation fund for all of the Auto Dealer cases in this MDL. In this capacity I make and receive assessments, as necessary, from the firms who are working together on behalf of the Automobile Dealer Plaintiffs, and use the collected money to pay expenses which are for the common benefit of the Automobile Dealer cases. Such common expenses relate to things like experts, e-discovery vendors, special master expenses, copy services, and translations/services.

3. The beginning balance of this litigation fund on July 1, 2018 was \$824,353.34. In addition to that balance, \$82,000.00 has been collected from counsel for the Auto Dealers through assessments. From July 1, 2018 until October 1, 2019, \$144,392.43 has been spent and paid by the litigation fund for common expenses in connection with the Actions and has not been reimbursed through a prior award of the Court. All of such expense payments were reasonable and necessary for the prosecution of the Actions.

4. Attached as Exhibit A is an itemization of the litigation fund expenses which have been paid for the Actions.

5. Attached as Exhibit B is an itemization of the amount totaling \$8,309.76 for the expenses reimbursed quarterly of Co-Counsel from the litigation fund.

6. I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed this 15th day of October, 2019.

Marie Thomas

Marie Thomas
BARRETT LAW GROUP, P.A.
404 Court Square
Lexington, MS 39095
Tel: 662-834-2488
Fax: 662-834-2628
mthomas@barrettlawgroup.com

STATE OF MISSISSIPPI
COUNTY OF HOLMES

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS THE 15th DAY OF OCTOBER, 2019.

Catherine E. Cain
NOTARY PUBLIC, State of Mississippi

My Commission Expires: Aug. 3, 2020



EXHIBIT A

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

UNREIMBURSED EXPENSES PAID BY THE AUTO DEALERS' LITIGATION FUND

Reporting Period: July 1, 2018 to October 1, 2019

EXPENSE	AMOUNT
Mediation	
Postage Charges	
Translations	
Long Distance	
Expense reimbursement quarterly of Co-Counsel	\$8,309.76
Experts	
Travel (Transportation, lodging, meals, etc.)depositions	
Filing Fees	
Professional Fees (expert/investigators, etc.)	\$46,044.50
Document Hosting	
Court Reporter/Transcripts	
Document Production/Scanning	\$90,038.17
Miscellaneous (Describe)	
TOTAL	\$ 144,392.43

EXHIBIT B

**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION
EXPENSE REIMBURSEMENT QUARTERLY OF CO-COUNSEL**

Reporting Period: July 1, 2018 to October 1, 2019

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK.

Don Barrett, P.A.
Trust Account
P.O. Box 927
Lexington, MS 39096
662-834-2486

BankPlus
210 E. Broadway
Yazoo City, MS 39184-2547
662-246-0001

7814

DATE 1/10/2019

85-1947653

PAY TO THE ORDER OF Thrash Law Firm

\$ 8,309.76

Eight Thousand Three Hundred Nine and 76/100 DOLLARS

Thrash Law Firm
101 N. Main Street
Little Rock, AR 72201

MEMO

Don Barrett

⑈ 7814 ⑈

Don Barrett, P.A.

7814

Thrash Law Firm		1/10/2019	
215 · Trust Account Liability	1st Quarter 2018 - Auto - HCP		1,951.73
215 · Trust Account Liability	1st Quarter 2018 - Auto - OSS		3,029.74
215 · Trust Account Liability	1st Quarter 2018 - Auto - General		336.59
215 · Trust Account Liability	2nd Quarter 2018 - Auto - General		1,198.20
215 · Trust Account Liability	2nd Quarter 2018 - Auto - OSS		1,793.50

BankPlus Trust/IOLTA

8,309.76

Don Barrett, P.A.

7814

Thrash Law Firm		1/10/2019	
215 · Trust Account Liability	1st Quarter 2018 - Auto - HCP		1,951.73
215 · Trust Account Liability	1st Quarter 2018 - Auto - OSS		3,029.74
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215 · Trust Account Liability	2nd Quarter 2018 - Auto - OSS		1,793.50

BankPlus Trust/IOLTA

8,309.76

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.
Case: Heater Control Panels (HCP)
Reporting Period: January 1, 2018 – March 31, 2018

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers (FedEx)	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$1,842.44
Long Distance Telephone Expense	\$
Meals	\$109.29
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$1,951.73

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.
Case: Occupant Safety Systems (OSS)
Reporting Period: January 1, 2018 – March 31, 2018

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$2,898.71
Long Distance Telephone Expense	\$
Meals	\$131.03
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$ -
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$3,029.74

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: General

Reporting Period: January 1, 2018 – March 31, 2018

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers (FedEx)	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$
Long Distance Telephone Expense	\$
Meals	\$336.59
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$336.59

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: General

Reporting Period: April 1, 2018 – June 30, 2018

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$
Long Distance Telephone Expense	\$
Meals	\$
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense (5,991 BW Copies)	\$1,198.20
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$1,198.20

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.
Case: Occupant Safety Systems (OSS)
Reporting Period: April 1, 2018 – June 30, 2018

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$1,693.47
Long Distance Telephone Expense	\$
Meals	\$100.03
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$1,793.50

AUTO PARTS EXPENSES
1st QUARTER 2018

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
1/16/18	Taxi (HCP)	\$24.23
1/16/18	Sports (Meal – HCP)	\$32.27
1/16/18	Burger King (Meal – HCP)	\$7.74
1/16/18	Central Michel (Meal – HCP)	\$53.45
1/17/18	Southwest (HCP)	\$299.70
1/17/18	Hyatt Place (HCP)	\$184.94
1/18/18	Taxi (HCP)	\$20.65
1/18/18	Clinton Airport Parking (HCP)	\$32.70
1/18/18	Pasta House (Meal – HCP)	\$15.83
1/18/18	Hyatt Place (HCP)	\$256.56
1/16/18	Southwest (HCP)	\$661.66
1/4/18	Southwest (HCP)	\$362.00
1/22/18	Uniguest Inc. (OSS)	\$6.52
1/22/18	Chick-fil-A (Meal – OSS)	\$6.70
1/22/18	Cabo Cantina West (Meal – OSS)	\$20.15
1/22/18	Taxi (OSS)	\$59.04
1/23/18	Boingo Wireless (OSS)	\$7.95
1/23/18	Southwest Airlines WIFI (OSS)	\$8.00
1/23/18	Taxi (OSS)	\$32.94
1/23/18	Taxi (OSS)	\$26.82
1/24/18	Taxi (OSS)	\$37.62
1/24/18	Taxi (OSS)	\$35.89
1/25/18	Taxi (OSS)	\$38.44
1/26/18	Pono Burger (Meal – OSS)	\$34.09
1/26/18	Taxi (OSS)	\$37.25
1/26/18	Taxi (OSS)	\$15.40
1/27/18	Cabo Cantina West (Meal – OSS)	\$19.90
1/27/18	Hollywood Hyatt (Hotel – OSS)	\$1,768.81
1/31/18	Clinton Airport (Parking – OSS)	\$54.50
1/24/18	Taxi (OSS)	\$36.19
1/22/18	World Duty Free (Meal – OSS)	\$3.11
1/22/18	Andaz West Hollywood (Meal – OSS)	\$40.56
1/12/18	Southwest Airlines (OSS)	\$251.00
1/12/18	American Airlines (OSS)	\$87.65
1/5/18	Southwest Airlines (OSS)	\$342.21
2/10/18	Doe's Eat Place (Meal – General)	\$336.59
2/26/18	Southwest Airlines (OSS)	\$36.00
3/20/18	Southwest Airlines (OSS)	\$23.00
	TOTAL	\$5,318.06

AUTO PARTS EXPENSES
2nd QUARTER 2018

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
4/17/18	Taxi (OSS)	\$20.60
4/17/18	Burger King (Meal – OSS)	\$7.74
4/17/18	Kirwan's on the Wharf (Meal – OSS)	\$44.30
4/18/18	Cucina Pizzeria (Meal – OSS)	\$12.65
4/19/18	Jennys's at the Wharf (Meal – OSS)	\$22.69
4/19/18	Cucina Pizzeria (Meal – OSS)	\$12.65
4/20/18	Hyatt (Hotel – OSS)	\$1,507.18
4/20/18	Clinton Airport (Parking – OSS)	\$43.60
4/20/18	Taxi (OSS)	\$16.19
4/23/18	Taxi (OSS)	\$18.89
5/2/18	Southwest Airlines (OSS)	\$87.01
6/30/18	Photocopies – 5991 BW Copies @ \$0.20 per copy	\$1,198.20
	TOTAL	\$2,991.70

AUTO PARTS EXPENSES
3rd QUARTER 2018

ZERO EXPENSES

AUTO PARTS EXPENSES
4th QUARTER 2018

ZERO EXPENSES

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
IGNITION COILS : 2:13-cv-01402
STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF MARIE THOMAS IN SUPPORT OF AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FOR ROUND FOUR SETTLEMENTS**

I, Marie Thomas, declare as follows:

1. I am the Accounting Manager for Barrett Law Group, P.A. I submit this declaration in support of Automobile Dealers Interim Co-Lead Counsel's motion for an award of attorneys' fees in connection with the services rendered, and costs and expenses incurred, in the Round Four settlements for the cases listed above (the "Actions").

2. On December 7, 2015, the Court entered an order granting the Auto Dealers' request to establish a fund for future litigation expenses in the amount of \$2,947,395.00 to be used for future litigation expenses in the cases at issue in the Round One settlements before the Court at that time. 2:12-cv-00102-MOB-MKM, ECF No. 401.

3. I have acted as treasurer of the Automobile Dealer Plaintiffs' Class Counsel and in that capacity have maintained said fund, called by Auto Dealer Class Counsel the "Round One Court-Restricted Fund."

4. From the original amount of \$2,947,395.00, the Round One Court-Restricted Fund has received additions of interest of \$135.22, a reimbursement from Barrett Law Group of \$54,426.10, and \$450,046.88 from money the Court awarded for past litigation expenses related to the Round One settlements. A total of \$2,610,217.24 has been expended from the Round One Court-Restricted Fund in accordance with the directions of the Court in its Order of December 7, 2015, and a total of \$841,785.96 remains in this fund. All of such expenditures were reasonable and necessary for the prosecution of the cases at issue in the Round One settlements.

5. Attached as Exhibit A is an itemization of the expenditures of the Round One Court-Restricted Fund from inception to October 1, 2019.

6. I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed this 15th day of October, 2019.

Marie Thomas

Marie Thomas
BARRETT LAW GROUP, P.A.
404 Court Square
Lexington, MS 39095
Tel: 662-834-2488
Fax: 662-834-2628
mthomas@barrettlawgroup.com

STATE OF MISSISSIPPI
COUNTY OF HOLMES

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS THE 15th DAY OF OCTOBER, 2019.

Catherine E. Cain

NOTARY PUBLIC, State of Mississippi

My Commission Expires: Aug. 3, 2020

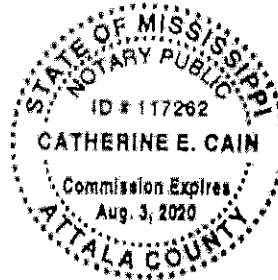


EXHIBIT A

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

UNREIMBURSED EXPENSES PAID BY THE AUTO DEALERS' LITIGATION FUND

Reporting Period: Inception to October 1, 2019

EXPENSE	AMOUNT
Mediation	\$31,794.98
Postage Charges	\$4,778.47
Translations	\$41,806.54
Long Distance	
Expense reimbursement quarterly of Co-Counsel	\$494,273.19
Experts	\$125,043.32
Travel (Transportation, lodging, meals, etc.)depositions	\$132,435.81
Filing Fees	
Professional Fees (expert/investigators, etc.)	
Document Hosting	\$952,816.45
Court Reporter/Transcripts	\$131,947.82
Document Production/Scanning	\$70,320.66
Miscellaneous: Purchase Price of Dataset	\$625,000.00
TOTAL	\$2,610,217.24

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
IGNITION COILS : 2:13-cv-01402
STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF MARIE THOMAS IN SUPPORT OF AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FOR ROUND FOUR SETTLEMENTS**

I, Marie Thomas, declare as follows:

1. I am the Accounting Manager for Barrett Law Group, P.A. I submit this declaration in support of Automobile Dealers Interim Co-Lead Counsel's motion for an award of attorneys' fees in connection with the services rendered, and costs and expenses incurred, in the Round Four settlements for the cases listed above (the "Actions").

2. On December 2, 2016, the Court entered an order granting the Auto Dealers' request to establish a fund for future litigation expenses in the amount of \$9,978,474.16 to be used for future litigation expenses in the cases at issue in the Round Two settlements before the Court at that time. 2:12-cv-00802-MOB-MKM, ECF No. 188.

3. I have acted as treasurer of the Automobile Dealer Plaintiffs' Class Counsel and in that capacity have maintained said fund, called by Auto Dealer Class Counsel the "Round Two Court-Restricted Fund."

4. From the original amount of \$9,978,474.16, a total of \$1,599,075.76 has been expended from the Round Two Court-Restricted Fund in accordance with the directions of the Court in its Order of December 2, 2016, of which \$181,636.77 has not been reimbursed, and a total of and a total of \$8,379,398.40 remains in this fund. All of such expenditures were reasonable and necessary for the prosecution of the cases at issue in the Round Two settlements.

5. Attached as Exhibit A is an itemization of the expenditures of the Round Two Court-Restricted Fund.

6. Attached as Exhibit B is an itemization of unreimbursed expenditures of the Round Two Court Restricted Fund.

7. Attached as Exhibit C is an itemization of the amount totaling \$1,834.47 for the expenses reimbursed to Auto Dealer counsel from the Round Two Court-Restricted Fund.

8. I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed this ^{21st}~~15th~~ day of October, 2019.

Marie Thomas
Marie Thomas
BARRETT LAW GROUP, P.A.
404 Court Square
Lexington, MS 39095
Tel: 662-834-2488
Fax: 662-834-2628
mthomas@barrettlawgroup.com

STATE OF MISSISSIPPI
COUNTY OF HOLMES

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS THE ST 21 DAY OF OCTOBER, 2019.

Mary Anne Alexander
NOTARY PUBLIC, State of Mississippi
My Commission Expires: 06/14/2023

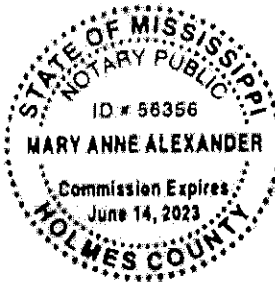


EXHIBIT A

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

UNREIMBURSED EXPENSES PAID BY THE AUTO DEALERS' LITIGATION FUND

Reporting Period: Inception to October 1, 2019

EXPENSE	AMOUNT
Mediation	\$297,680.90
Postage Charges	
Translations	\$38,489.40
Long Distance	
Expense reimbursement quarterly of Co-Counsel	\$238,606.00
Experts	
Travel (Transportation, lodging, meals, etc.) depositions	\$45,042.17
Filing Fees	
Professional Fees (expert/investigators, etc.)	\$246,964.00
Document Hosting	\$470,854.65
Court Reporter/Transcripts	\$75,590.16
Document Production/Scanning	\$185,848.48
Miscellaneous (Describe)	
TOTAL	\$1,599,075.76

EXHIBIT B

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

UNREIMBURSED EXPENSES PAID BY THE AUTO DEALERS' LITIGATION FUND

Reporting Period: Inception to October 1, 2019 (unreimbursed)

EXPENSE	AMOUNT
Mediation	20,442.50
Postage Charges	
Translations	
Long Distance	
Expense reimbursement quarterly of Co-Counsel	1,834.47
Experts	
Travel (Transportation, lodging, meals, etc.) depositions	
Filing Fees	
Professional Fees (expert/investigators, etc.)	12,112.50
Document Hosting	144,012.22
Court Reporter/Transcripts	
Document Production/Scanning	3,235.08
Miscellaneous (Describe)	
TOTAL	\$181,636.77

EXHIBIT C

**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION
EXPENSE REIMBURSEMENT QUARTERLY OF CO-COUNSEL**

Reporting Period: Inception to October 1, 2019

Don Barrett, P.A.
Trust Account
P.O. Box 927
Lexington, MS 39095
662-834-2488

BankPlus
210 E Broadway
Yazoo City, MS 39194-4547
662-746-0654
85-194/853

7854

DATE 3/4/2019

PAY TO THE ORDER OF

Cuneo, Gilbert & LaDuca LLP

\$ 1,834.47

One Thousand Eight Hundred Thirty-Four and 47/100

DOLLARS

Cuneo, Gilbert & LaDuca LLP
4725 Wisconsin Ave, NW, Ste 200
Washington, DC 20016

MEMO

Marie Thomas

⑈ 7854 ⑈ ⑆065

Don Barrett, P.A.		7854
Cuneo, Gilbert & LaDuca LLP	3/4/2019	
215 Trust Account Liability	Auto - Ct #2 08/31/2016 expense reimbursement	1,834.47



BankPlus Trust/IOLTA 1,834.47

Don Barrett, P.A.		7854
Cuneo, Gilbert & LaDuca LLP	3/4/2019	
215 Trust Account Liability	Auto - Ct #2 08/31/2016 expense reimbursement	1,834.47

BankPlus Trust/IOLTA 1,834.47

**In Re: Auto Parts Antitrust Litigation
MDL 2311**

LODESTAR SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Auto Parts Settling Cases
Reporting Period: Inception - Dec 31, 2018

Case	Round I 9/15/15	Round II 8/31/16	Round III 6/30/18
Anti-Vibrational Rubber Parts			\$7,739.02
Automotive Brake Hoses			\$339.07
Auto Parts General			\$69,942.62
Body Sealing Products			\$607.31
Constant Velocity Joint Boots			\$5.38
Heater Control Panels			\$330.81
Wire Harness		\$1,834.47	\$0.00
TOTAL	\$0.00	\$1,834.47	\$78,964.21

WIRE HARNESS LITIGATION - EXPENSES

Firm Name: Cuneo Gilbert & LaDuca, LLP

Month Ended: Inception thru December 31, 2018 Wire Harness

DESCRIPTION	CURRENT AMOUNT
Assessment Payment	
Federal Express, Local Courier, etc.	\$87.58
Postage Charges	
Facsimile Charges	
Long Distance	\$25.00
In-House Photocopying	
Outside Photocopying	
Travel (transportation, lodging, meals, etc.)	\$858.69
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$883.20
Miscellaneous Mediation	
CURRENT TOTAL	\$1,834.47

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S): :
: :
INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
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AUTOMOTIVE HOSES : 2:15-cv-03202
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ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

DECLARATION OF JONATHAN W. CUNEO
CONCERNING TIME AND EXPENSES
INCURRED BY CUNEO GILBERT & LADUCA, LLP

I, Jonathan W. Cuneo, declare as follows:

1. I am a partner at the law firm of Cuneo Gilbert & LaDuca, LLP and am currently Interim Co-Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”). I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. (“the Actions”).

2. I have personal knowledge of the matters set forth herein, and if called upon to testify thereto, could do so competently. I make this declaration pursuant to 28 U.S.C. § 1746.

3. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”) in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and

- Travel related to the above tasks.

4. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

5. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

6. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Cuneo Gilbert & LaDuca, LLP in similar complex class action matters and are similar to rates approved for our work by other courts.

7. My firm has expended a total of \$7,583.33 in costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September

30, 2019. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

8. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be submitted to the Court in a separate declaration.

9. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 47,200.32 hours. The total lodestar for my firm for this period using current hourly billing rates is \$31,211,778.50.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th day of October 2019 in Washington, DC.

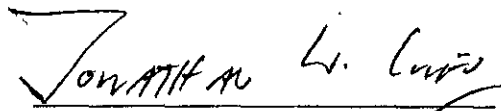

Jonathan W. Cuneo (DC #939389)

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: Cuneo Gilbert & LaDuca, LLP

Reporting Period: Inception – September 30, 2019

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	\$950	4,947.55	\$4,700,172.50
Pamela Gilbert	P	\$575	18.10	\$10,407.50
Charles LaDuca	P	\$825	9.10	\$7,507.50
Joel Davidow	P	\$995	1,495.15	\$1,487,674.25
Charles Tiefer	OC	\$895	341.85	\$305,955.75
Robert Cynkar	P	\$775	3.35	\$2,596.25
Michael Flannery	P	\$895	45.10	\$40,364.50
Monica E. Miller	P	\$895	262.55	\$234,982.25
David W. Stanley	P	\$800	1.50	\$1,200.00
Sandra Cuneo	P	\$725	104.00	\$75,400.00
Matthew Wiener	P	\$700	0.35	\$245.00
Daniel Cohen	P	\$705	2,883.77	\$2,033,055.50
Alexandra Warren	P	\$725	2.85	\$2,066.25
William Anderson	P	\$675	2.50	\$1,687.50
Preetpal Grewal	-	\$575	2.00	\$1,150.00
Katie Van Dyck	P	\$725	417.45	\$302,651.25
Jennifer Kelly	P	\$700	4,083.90	\$2,858,730.00
Victoria Sims	P	\$675	16,917.15	\$11,419,076.25
Brendan Thompson	P	\$700	3.75	\$2,625.00
Taylor Asen	A	\$550	808.75	\$444,812.50
Evelyn Li	A	\$650	8,655.00	\$5,625,750.00
Beatrice Yakubu	A	\$675	238.00	\$160,650.00
Blaine Finley	A	\$600	1,118.30	\$670,980.00
Peter Gil-Montllor	A	\$600	16.80	\$10,080.00
Julie Sorenson	A	\$500	5.00	\$2,500.00
Benjamin Elga	A	\$450	359.50	\$161,775.00
Anthony Carter	A	\$375	17.25	\$6,468.75
Tim Powell	PL	\$225	74.00	\$16,650.00
Daniel Black	PL	\$200	209.90	\$41,980.00

Laura Cheek	PL	\$200	1.25	\$250.00
Ben Elga	PL	\$200	0.25	\$50.00
Dasha Gorlov	PL	\$200	2.60	\$520.00
Dasha Gorlov	PL	\$175	3.00	\$525.00
Daniel Howick	PL	\$200	6.45	\$1,290.00
Tess Illos	PL	\$200	11.00	\$2,200.00
Vasiliki Katsarou	PL	\$200	0.25	\$50.00
Kyle Lambrecht	PL	\$200	128.25	\$25,650.00
Matthew Laps	PL	\$200	28.25	\$5,456.25
Claire Peters	PL	\$200	22.00	\$4,400.00
Annie Reiner	PL	\$200	40.00	\$8,000.00
Gabe Stutman	PL	\$200	16.00	\$3,200.00
Eleanor Anthony	PL	\$175	94.75	\$16,581.25
Melisa Azak	PL	\$175	408.50	\$71,487.50
Nadia Belkin	PL	\$175	552.25	\$96,643.75
Gteg Heeren	PL	\$175	2.00	\$350.00
Ava Mehta	PL	\$175	29.25	\$5,118.75
Alexandra Peck	PL	\$175	596.10	\$104,317.50
Marie Schenk	PL	\$175	731.35	\$127,986.25
Camille Trotter	PL	\$175	86.10	\$15,067.50
Natasha Vij	PL	\$175	63.00	\$11,025.00
John Yuill	PL	\$175	5.75	\$1,006.25
Annie Zanobini	PL	\$175	0.50	\$87.50
Aaron Zoelick	PL	\$175	63.50	\$11,112.50
Chris Fisher		\$120	100.50	\$12,060.00
Billy Czerwiniski	PL	\$50	1,163.00	\$58,150.00
TOTALS			47,200.32	\$31,211,778.50

Partner (P)
 Associate (A)
 Paralegal (PL)
 Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: Cuneo Gilbert & LaDuca, LLP
Reporting Period: Inception – September 30, 2019

DESCRIPTION	CURRENT AMOUNT
Assessment Payment	
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (transportation, lodging, meals, etc.)	\$7,051.35
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$531.98
Miscellaneous	
CURRENT TOTAL	\$7,583.33

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

- INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
- HEATER CONTROL PANELS : 2:12-cv-00402
- BEARINGS : 2:12-cv-00502
- OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
- RADIATORS : 2:13-cv-01002
- AUTOMOTIVE LAMPS : 2:13-cv-01202
- SWITCHES : 2:13-cv-01302
- IGNITION COILS : 2:13-cv-01402
- STEERING ANGLE SENSORS : 2:13-cv-01602
- HID BALLASTS : 2:13-cv-01702
- ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
- FUEL INJECTION SYSTEMS : 2:13-cv-02202
- AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
- VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
- AIR CONDITIONING SYSTEMS : 2:13-cv-02702
- CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
- SPARK PLUGS : 2:15-cv-03002
- AUTOMOTIVE HOSES : 2:15-cv-03202
- SHOCK ABSORBERS : 2:16-cv-03302
- BODY SEALING PRODUCTS : 2:16-cv-03402
- INTERIOR TRIM PRODUCTS : 2:16-cv-03502
- BRAKE HOSES : 2:16-cv-03602
- EXHAUST SYSTEMS : 2:16-cv-03702
- CERAMIC SUBSTRATES : 2:16-cv-03802
- POWER WINDOW SWITCHES : 2:16-cv-03902
- AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
- ACCESS MECHANISMS : 2:16-cv-04102
- SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

DECLARATION OF DON BARRETT
CONCERNING TIME AND EXPENSES INCURRED BY
BARRETT LAW GROUP, P.A.

I, Don Barrett, declare as follows:

1. I am a partner at the law firm of Barrett Law Group, P.A., and am currently Interim Co-Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”). I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. (“the Actions”).

2. I have personal knowledge of the matters set forth herein, and if called upon to testify thereto, could do so competently. I make this declaration pursuant to 28 U.S.C. § 1746.

3. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”) in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and

- Travel related to the above tasks.

4. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

5. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

6. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Barrett Law Group, P.A. in similar complex class action matters and are similar to rates approved for our work by other courts.

7. My firm has expended a total of \$98,414.78 in unreimbursed costs and expenses in connection with the prosecution of the Actions from Round Two settlements through

September 30, 2019. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

8. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be submitted to the Court in a separate declaration.

9. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 14,166 hours. The total lodestar for my firm for this period using current hourly billing rates is \$11,929,075.50.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th day of October, 2019 in Lexington, Mississippi.



Don Barrett

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: Barrett Law Group, P.A.

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Don Barrett	P	7,279.4	\$1,250.00	\$9,099,250.00
Richard Barrett	P	149.8	\$575.00	\$86,135.00
Katherine Riley	P	128.4	\$575.00	\$73,830.00
Charles Barrett	P	3.0	\$575.00	\$1,725.00
Brian Herrington	A	120.3	\$575.00	\$69,172.50
David McMullan	A	166.2	\$575.00	\$77,953.00
Sterling Starns	A	627.0	\$575.00	\$360,525.00
Ben White	A	1,400.7	\$575.00	\$805,402.50
Don Foose	A	866.2	\$575.00	\$498,065.00
Brandi Hamilton	A	407.1	\$575.00	\$234,082.50
Cary Littlejohn	A	17.2	\$575.00	\$9,890.00
Rob McGill	A	17.0	\$575.00	\$9,775.00
Nanci-Taylor Maddux	PL	2,076.2	\$225.00	\$467,145.00
Marie Thomas	PL	304.0	\$150.00	\$45,600.00
Carolyn Mirick	PL	140.0	\$150.00	\$21,000.00
Cate Barnes	PL	135.3	\$150.00	\$20,295.00
Zach Schutz	PL	245.4	\$150.00	\$36,810.00
Melanie Davis	PL	72	\$150.00	\$10,800.00
Christy Maddux	PL	10.8	\$150.00	\$1,620.00
TOTALS		14,166.0		\$11,929,075.50

Partner (P)

Associate (A)

Paralegal (PL)

Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: Barrett Law Group, P.A.

Reporting Period: September 1, 2016 – September 30, 2019

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$320.45
Postage Charges	\$0.93
Facsimile Charges	
Long Distance	\$1,077.21
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	\$96,468.71
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$47.48
Miscellaneous (Describe)	\$500.00
TOTAL	\$98,414.78

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

- INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
- HEATER CONTROL PANELS : 2:12-cv-00402
- BEARINGS : 2:12-cv-00502
- OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
- RADIATORS : 2:13-cv-01002
- AUTOMOTIVE LAMPS : 2:13-cv-01202
- SWITCHES : 2:13-cv-01302
- IGNITION COILS : 2:13-cv-01402
- STEERING ANGLE SENSORS : 2:13-cv-01602
- HID BALLASTS : 2:13-cv-01702
- ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
- FUEL INJECTION SYSTEMS : 2:13-cv-02202
- AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
- VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
- AIR CONDITIONING SYSTEMS : 2:13-cv-02702
- CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
- SPARK PLUGS : 2:15-cv-03002
- AUTOMOTIVE HOSES : 2:15-cv-03202
- SHOCK ABSORBERS : 2:16-cv-03302
- BODY SEALING PRODUCTS : 2:16-cv-03402
- INTERIOR TRIM PRODUCTS : 2:16-cv-03502
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- POWER WINDOW SWITCHES : 2:16-cv-03902
- AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
- ACCESS MECHANISMS : 2:16-cv-04102
- SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF SHAWN M. RAITER
CONCERNING TIME AND EXPENSES INCURRED BY LARSON • KING, LLP**

I, Shawn M. Raiter, declare as follows:

1. I am a partner at the law firm of Larson • King, LLP and am currently Interim Co-Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”). I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, for the benefit of the cases listed above and for which settlements have been presented for final approval. (“the Actions”).

2. I have personal knowledge of the matters set forth herein, and if called upon to testify thereto, could do so competently. I make this declaration pursuant to 28 U.S.C. § 1746.

3. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”) in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

4. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

5. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent for the benefit of cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

6. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Larson • King, LLP in similar complex class action matters and are similar to rates approved for our work by other courts.

7. My firm has expended a total of **\$18,994.90** in costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 30, 2019. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement

class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

8. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be described to the Court in a separate declaration.

9. The Law Offices of George A. Barton ("Barton Firm") provided work for the benefit of Dealership Plaintiffs and incurred expenses that have been submitted to Interim Co-Lead Class Counsel for reimbursement. The Barton Firm was previously reimbursed \$24,490.20 for expenses but has not been reimbursed for **\$9,327.69** in costs and expenses that Interim Co-Lead Class Counsel believe should be reimbursed from the current settlements. These costs generally related to the gathering and production of Auto Dealership Plaintiff documents requested by Defendants in discovery.

10. From inception through September 30, 2019, the total number of hours my firm has spent representing Auto Dealership Plaintiffs in the Actions, including work done to benefit the Actions, is **19200.4 hours**. The total lodestar for my firm for this period using current hourly billing rates is **\$9,066,970.50**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 8th day of November, 2019 in St. Paul, Minnesota.

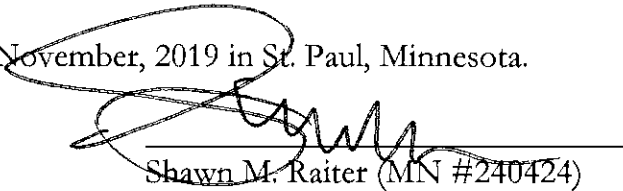

Shawn M. Raiter (MN #240424)

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: Larson · King, LLP

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Shawn M Raiter	P	6197.6	\$805.00	\$4,989,068.00
T. Joseph Snodgrass	P	29.7	\$805.00	\$23,908.50
Melissa M. Mulloy	P	56.5	\$445.00	\$25,142.50
Kelly A. Lelo	P	304.0	\$445.00	\$135,280.00
Paul A. Sand	A	1367.1	\$345.00	\$471,649.50
Bradley R Prowant	A	103.1	\$345.00	\$35,569.50
Andrew M. Hart	A	1146.2	\$345.00	\$395,439.00
Paul Shapiro	A	307.6	\$345.00	\$106,122.00
Cassandra F. Fortin	A	37.8	\$345.00	\$13,041.00
Renee I. Fossen	A	2033.1	\$345.00	\$701,419.50
David P. McKinney	A	41.0	\$345.00	\$14,145.00
Hilary J. Palazzolo	A	194.2	\$345.00	\$66,999.00
Jennifer L. Young	A	116.9	\$345.00	\$40,330.50
Stephanie L. Chandler	A	31.1	\$345.00	\$10,729.50
Kimberly J. King	A	59.6	\$345.00	\$20,562.00
Mary E. Relhsen	A	166.1	\$345.00	\$57,304.50
Michael K. Carlson	A	1851.4	\$345.00	\$638,733.00
Cindy L. Lambing	A	421.0	\$345.00	\$145,245.00
Andrea B. Mosher	A	37.0	\$345.00	\$12,765.00
Alyssa G. Smith	A	196.1	\$345.00	\$67,654.50
Heather M. Follensbee	A	51.0	\$345.00	\$17,595.00
Jan R. Jeske	A	47.2	\$345.00	\$16,284.00
Gregg J. Cavanagh	A	56.9	\$345.00	\$19,630.50
Marcia A. Miller	A	71.0	\$345.00	\$24,495.00
Elizabeth K. Elling	A	1528.2	\$345.00	\$527,229.00
Diane M. Schreifels	PL	140.4	\$200.00	\$28,080.00
Gretchen A. Touchette	PL	861.4	\$200.00	\$172,280.00
Louise Bautch-Holton	PL	5.5	\$195.00	\$1,072.50
Anne Rodriguez	PL	158.0	\$170.00	\$26,860.00
Bjorn Hedstrom	PL	131.5	\$170.00	\$22,355.00
John Sievers	PL	382.2	\$170.00	\$64,974.00
Lauren M. Yates	PL	220.1	\$170.00	\$37,417.00
Wendy J. Welsh	PL	32.0	\$170.00	\$5,440.00

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Michael Mobley	PL	24.0	\$170.00	\$4,080.00
Darya O. Lucas	PL	24.0	\$170.00	\$4,080.00
Michelle T. Foster	PL	11.0	\$170.00	\$1,870.00
Rachel I. Farhi	PL	52.4	\$170.00	\$8,908.00
Heidi J. Rude	PL	72.0	\$170.00	\$12,240.00
Niquaise Y. Moore	PL	57.4	\$170.00	\$9,758.00
Lee A. Miller	PL	53.5	\$170.00	\$9,095.00
Latonya S. Irvin	PL	46.5	\$170.00	\$7,905.00
Tanya M. Baker	PL	58.6	\$170.00	\$9,962.00
Jay C. Clifton	PL	15.5	\$170.00	\$2,635.00
Sarah C. Rogers	PL	57.0	\$170.00	\$9,690.00
Lauren E. Pearson	PL	41.1	\$170.00	\$6,987.00
Linda J. Bell	PL	40.5	\$170.00	\$6,885.00
Ian D. Wright	PL	211.3	\$160.00	\$33,808.00
Laurie Burks	LAA	53.1	\$80.00	\$4,248.00
TOTALS		19,200.40		\$9,066,970.50

Partner (P)
 Associate (A)
 Paralegal (PL)
 Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: Larson • King, LLP

Reporting Period: Inception – September 30, 2019

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$174.15
Postage Charges	\$0.00
Facsimile Charges	\$0.00
Long Distance	\$279.07
In-House Photocopying	\$0.00
Outside Photocopying	\$0.00
Travel (Transportation, lodging, meals, etc.)	\$1,370.41
Court Fees (filing, etc.)	\$0.00
Professional Fees (expert/investigators, etc.)	\$0.00
Witness/Service Fees	\$0.00
Court Reporter/Transcripts	\$0.00
Computer Research	\$17,171.27
Miscellaneous (Describe)	\$0.00
TOTAL	\$18,994.90

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
IGNITION COILS : 2:13-cv-01402
STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

DECLARATION OF GERARD V. MANTESE
CONCERNING TIME AND EXPENSES INCURRED BY MANTESE
HONIGMAN PC

I, Gerard Mantese, declare as follows:

1. I am a partner at the law firm of Mantese Hongiman, PC and am currently Liason Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”). I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. (“the Actions”).

2. I have personal knowledge of the matters set forth herein, and if called upon to testify thereto, could do so competently. I make this declaration pursuant to 28 U.S.C. § 1746.

3. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”) in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

4. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

5. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

6. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Mantese Honigman, PC in similar complex class action matters and are similar to rates approved for our work by other courts.

7. My firm has expended a total of \$5,263.12 in costs and expenses in which the Court has yet to issue an order on reimbursement in connection with the prosecution of the Actions through September 30, 2019. My firm advanced these costs with no guarantee that

the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

8. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be submitted to the Court in a separate declaration.

9. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 7,170.50 hours. The total lodestar for my firm for this period using current hourly billing rates is \$4,165,544.00

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th day of October, 2019 in Oakland County, Michigan.

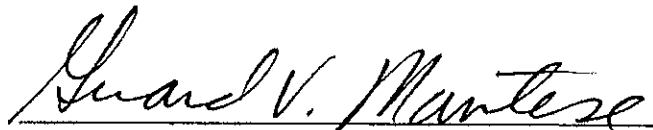

Gerard V. Mantese (P34424)

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: Mantese Honigman, PC

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Gerard Mantese	P	693.3	\$775	\$537,307.50
David Honigman	P	45.05	\$775	\$34,913.75
Douglas Toering	P	13.60	\$775	\$10,540.00
Theresamarie Mantese	P	1596.45	\$775	1,237,248.75
Ian Williamson	P	1.30	\$775	\$1,007.50
Mark Rossman	P	.70	\$775	\$542.50
Sara MacWilliams	P	.90	\$775	\$697.50
Alex Blum	A	1008.65	\$495	\$499,281.75
Brendan Frey	A	853.05	\$495	\$422,259.75
Brian Saxe	A	3.4	\$495	\$1,683.00
David Hansma	A	80.45	\$495	\$39,822.75
Emily Fields	A	28.8	\$495	\$14,256.00
Fatima Bolyea	A	3.5	\$495	\$1,732.50
James Buster	A	360.90	\$495	\$178,645.50
Jonathan Ajlouny	A	.5	\$495	\$247.50
Jordan Segal	A	830	\$495	\$410,850.00
Joshua Lushnat	A	138.65	\$495	\$68,631.75
Kate Eisenstein	A	683.55	\$495	\$338,357.25
Krista Hosmer	A	671.45	\$495	\$332,367.75
Terry Osgood	A	36.10	\$495	\$17,869.50
Tishia Browning	A	7.70	\$495	\$3,811.50
Law Clerk	LC	20	\$120	\$2,400.00
Paralegal	PL	1.5	\$100	\$150
Sherri Sikorski	LAA	89.50	\$120	\$10,740.00
Leah Jackson	LAA	1.5	\$120	\$180.00
Total		7170.50		\$4,165,544.00

Partner (P)
 Associate (A)
 Paralegal (PL)
 Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: Mantese Honigman, PC
Reporting Period: Inception – September 30, 2019

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$70.00
Postage Charges	\$257.09
Facsimile Charges	
Long Distance	\$.85
In-House Photocopying	\$85.10
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	\$969.88
Court Fees (filing, etc.)	\$2,800.00
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$1,080.20
Miscellaneous (Office supplies of CDs to send out)	
TOTAL	\$5,263.12

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATHER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
IGNITION COILS : 2:13-cv-01402
STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

DECLARATION OF DEWITT M. LOVELACE
CONCERNING TIME AND EXPENSES INCURRED BY
LOVELACE AND ASSOCIATES, P.A.

I, Dewitt M. Lovelace, declare as follows:

1. I am a partner at the law firm of Lovelace and Associates, P.A. I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the

lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

5. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Lovelace and Associates, P.A. in similar complex class action matters and are similar to rates approved for our work by other courts.

6. My firm has expended a total of \$1,604.80 in costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 30, 2019. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to

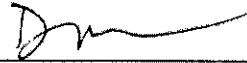
this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

7. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be submitted to the Court in a separate declaration.

8. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 3,124.7 hours. The total lodestar for my firm for this period using current hourly billing rates is **\$1,290,707.50**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th day of October, 2019 in Miramar Beach, Florida.



Dewitt M. Lovelace

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

**Firm Name: Lovelace and Associates, P.A.
Reporting Period: Inception – September 30, 2019**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Dewitt M. Lovelace	P	654.8	\$850.00	\$556,580.00
Valerie M. Lauro	A	330.3	\$400.00	\$132,120.00
Marshall Smith	A	97.9	\$675.00	\$66,082.50
Gary Yarborough	A	268.6	\$675.00	\$181,305.00
Sandy Rosenthal	PL	1,521.9	\$200.00	\$304,380.00
Tammy Turley	PL	251.2	\$200.00	\$50,240.00
TOTALS		3,124.7		\$1,290,707.5

Partner (P)
Associate (A)
Paralegal (PL)
Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: Lovelace and Associates, P.A.

Reporting Period: Inception – September 30, 2019

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	\$913.05
In-House Photocopying	\$691.75
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	\$ 1,604.80

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

- INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
- HEATER CONTROL PANELS : 2:12-cv-00402
- BEARINGS : 2:12-cv-00502
- OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
- RADIATORS : 2:13-cv-01002
- AUTOMOTIVE LAMPS : 2:13-cv-01202
- SWITCHES : 2:13-cv-01302
- IGNITION COILS : 2:13-cv-01402
- STEERING ANGLE SENSORS : 2:13-cv-01602
- HID BALLASTS : 2:13-cv-01702
- ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
- FUEL INJECTION SYSTEMS : 2:13-cv-02202
- AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
- VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
- AIR CONDITIONING SYSTEMS : 2:13-cv-02702
- CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
- SPARK PLUGS : 2:15-cv-03002
- AUTOMOTIVE HOSES : 2:15-cv-03202
- SHOCK ABSORBERS : 2:16-cv-03302
- BODY SEALING PRODUCTS : 2:16-cv-03402
- INTERIOR TRIM PRODUCTS : 2:16-cv-03502
- BRAKE HOSES : 2:16-cv-03602
- EXHAUST SYSTEMS : 2:16-cv-03702
- CERAMIC SUBSTRATES : 2:16-cv-03802
- POWER WINDOW SWITCHES : 2:16-cv-03902
- AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
- ACCESS MECHANISMS : 2:16-cv-04102
- SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF THOMAS P. THRASH
CONCERNING TIME AND EXPENSES INCURRED
BY THRASH LAW FIRM, P.A.**

I, Thomas P. Thrash, declare as follows:

1. I am a partner at the law firm of Thrash Law Firm, P.A. and am currently one of the attorneys for the the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”). I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers’ motion for an award of attorneys’ fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. (“the Actions”).

2. I have personal knowledge of the matters set forth herein, and if called upon to testify thereto, could do so competently. I make this declaration pursuant to 28 U.S.C. § 1746.

3. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs (“Dealership Plaintiffs”) in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

4. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

5. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

6. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Thrash Law Firm, P.A. in similar complex class action matters and are similar to rates approved for our work by other courts.

7. My firm has expended a total of \$57.80 in costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 30, 2019. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement

class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

8. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be submitted to the Court in a separate declaration.

9. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 3,717.40 hours. The total lodestar for my firm for this period using current hourly billing rates is **\$2,508,645.00**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th day of October, 2019 in Little Rock, Arkansas.

/s/Thomas P. Thrash
Thomas P. Thrash (#80147)

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: Thrash Law Firm, P.A.

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Thomas P. Thrash	P	1290.80	\$850.00	\$1,097,180.00
Marcus N. Bozeman	A	1243.90	\$750.00	\$932,925.00
James Hollensworth	A	605.00	\$600.00	\$363,000.00
Cydni Arterbury	PL	577.70	\$200.00	\$115,540.00
TOTALS		3717.40		\$2,508,645.00

Partner (P)

Associate (A)

Paralegal (PL)

Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: Thrash Law Firm, P.A.

Reporting Period: Inception – September 30, 2019

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	\$57.40
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$.40
Miscellaneous (Describe)	
TOTAL	\$ 57.80

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
IGNITION COILS : 2:13-cv-01402
STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF JOHN C. KAKINUKI
CONCERNING TIME AND EXPENSES INCURRED BY KAKINUKI LAW
OFFICE, PC**

I, John C. Kakinuki, declare as follows:

1. I am the sole shareholder, CEO and an attorney at the law firm of Kakinuki Law Office, PC. I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, in English and in Japanese, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions, in English and in Japanese;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

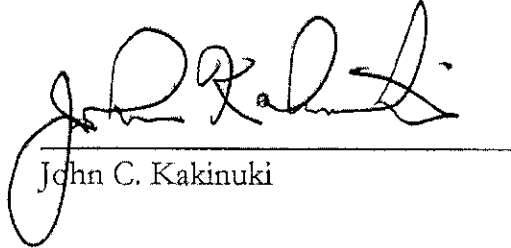
4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

5. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Kakinuki Law Office, PC in similar complex class action matters and are similar to rates approved for our work by other courts.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 3,543.8 hours. The total lodestar for my firm for this period using current hourly billing rates is **\$2,498,640.00**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 17th day of October, 2019 in San Rafael, California.



John C. Kakinuki

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: **KAKINUKI LAW OFFICE, PC**

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
JOHN C. KAKINUKI	P	2,702.8	\$800.00	\$2,162,240.00
KENTON KNOP	O	841.0	\$400.00	\$336,400.00
TOTALS		3,543.8		\$2,498,640.00

- Partner (P)
- Of Counsel (O)
- Associate (A)
- Paralegal (PL)
- Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
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STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF CHARLES BARRETT
CONCERNING TIME AND EXPENSES INCURRED BY
NEAL & HARWELL, PLC**

I, Charles Barrett, declare as follows:

1. I am a partner at the law firm of Neal & Harwell, PLC. I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. ("the Actions").

2. I have personal knowledge of the matters set forth herein, and if called upon to testify thereto, could do so competently. I make this declaration pursuant to 28 U.S.C. § 1746.

3. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

4. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

5. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

6. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Neal & Harwell PLC in similar complex class action matters and are similar to rates approved for our work by other courts.

7. My firm also paid assessments to a litigation fund maintained by Interim Co-Lead Class Counsel. Those assessments are not reflected in Exhibit 2 and will be submitted to the Court in a separate declaration.

8. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 688.20 hours. The total lodestar for my firm for this period using current hourly billing rates is \$213,133.75.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 15th day of October, 2019 in Nashville, Tennessee.

s/Charles Barrett
Charles Barrett

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: NEAL & HARWELL, PLC

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Charles Barrett	P	57.80	\$425.00	\$24,565.00
Charles Barrett	P	203.70	\$400.00	\$81,480.00
Elizabeth Tipping	P	10.75	\$375.00	\$4,031.25
Blind Akrawi	P	93.00	\$300.00	\$27,900.00
Megan Deardorff	A	45.25	\$300.00	\$13,575.00
William J. Harbison II	A	187.75	\$225.00	\$42,243.75
Jeffrey Zager	A	67.00	\$225.00	\$15,075.00
Marie Scott	A	9.50	\$225.00	\$2,137.50
Mariam Stockton	A	6.25	\$225.00	\$1,406.25
Dawn Garrison	PL	7.2	\$100.00	\$720.00
TOTALS		688.20		\$213,133.75

Partner (P)

Associate (A)

Paralegal (PL)

Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
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PRODUCT(S):	:	
AUTOMOTIVE WIRE HARNESSSES	:	2:12-cv-00102
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
ANTI-VIBRATION RUBBER PARTS	:	2:13-cv-00802
WINDSHIELD WIPERS	:	2:13-cv-00902
RADIATORS	:	2:13-cv-01002
STARTERS	:	2:13-cv-01102
AUTOMOTIVE LAMPS	:	2:12-cv-01202
IGNITION COILS	:	2:13-cv-01402
HID BALLASTS	:	2:12-cv-01702
ELECTRONIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FAN MOTORS	:	2:13-cv-02102
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
POWER WINDOW MOTORS	:	2:13-cv-02302
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
WINDSHIELD WASHERS	:	2:13-cv-02802
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
MINIMODULES	:	2:17-cv-04302
SIDE DOOR LATCHES	:	2:17-cv-13005
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This Document Relates to:	:	Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS	:	
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DECLARATION OF BRIAN HERRINGTON
CONCERNING TIME AND EXPENSES INCURRED BY HERRINGTON LAW,
P.A.

I, Brian Herrington, declare as follows:

1. I am a partner at the law firm of Herrington Law P.A. I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases

through June 30, 2018. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

5. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Herrington Law P.A. in similar complex class action matters and are similar to rates approved for our work by other courts.


6. My firm has expended a total of \$33,533.41 in costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through June 30, 2018. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to represent and benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the

schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions.

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through June 30, 2018 is 1,431.30 hours. The total lodestar for my firm for this period using current hourly billing rates is \$822,997.50.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this the 1st day of August, 2018 in Jackson, MS.



Brian Herrington

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: HERRINGTON LAW P.A.

Reporting Period: Inception – June 30, 2018

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
BRIAN HERRINGTON	P	1,431.3	\$575.00	\$822,997.50
	P		\$	\$
	P		\$	\$
	P			\$
	A		\$	\$
	A		\$	\$
	PL		\$	\$
	PL		\$	\$
	PL		\$	\$
	LAA		\$	\$
TOTALS		1,431.3		\$822,997.50

Partner (P)

Associate (A)

Paralegal (PL)

Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Expenses

Firm Name: HERRINGTON LAW P.A.

Reporting Period: Inception – June 30, 2018

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$
Postage Charges	\$
Facsimile Charges	\$
Long Distance	\$
In-House Photocopying	\$
Outside Photocopying	\$
Travel (Transportation, lodging, meals, etc.)	\$33,533.41
Court Fees (filing, etc.)	\$
Professional Fees (expert/investigators, etc.)	\$
Witness/Service Fees	\$
Court Reporter/Transcripts	\$
Computer Research	\$
Miscellaneous (Describe)	\$
TOTAL	\$33,533.41

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS :
ANTITRUST LITIGATION : Master File No. 12-md-02311

PRODUCT(S): :

INSTRUMENT PANEL CLUSTERS : 2:12-cv-00202
HEATER CONTROL PANELS : 2:12-cv-00402
BEARINGS : 2:12-cv-00502
OCCUPANT SAFETY RESTRAINT SYSTEMS : 2:12-cv-00602
RADIATORS : 2:13-cv-01002
AUTOMOTIVE LAMPS : 2:13-cv-01202
SWITCHES : 2:13-cv-01302
IGNITION COILS : 2:13-cv-01402
STEERING ANGLE SENSORS : 2:13-cv-01602
HID BALLASTS : 2:13-cv-01702
ELECTRIC POWERED STEERING ASSEMBLIES : 2:13-cv-01902
FUEL INJECTION SYSTEMS : 2:13-cv-02202
AUTOMATIC TRANSMISSION FLUID WARMERS : 2:13-cv-02402
VALVE TIMING CONTROL DEVICES : 2:13-cv-02502
AIR CONDITIONING SYSTEMS : 2:13-cv-02702
CONSTANT VELOCITY JOINT BOOT PRODUCTS : 2:14-cv-02902
SPARK PLUGS : 2:15-cv-03002
AUTOMOTIVE HOSES : 2:15-cv-03202
SHOCK ABSORBERS : 2:16-cv-03302
BODY SEALING PRODUCTS : 2:16-cv-03402
INTERIOR TRIM PRODUCTS : 2:16-cv-03502
BRAKE HOSES : 2:16-cv-03602
EXHAUST SYSTEMS : 2:16-cv-03702
CERAMIC SUBSTRATES : 2:16-cv-03802
POWER WINDOW SWITCHES : 2:16-cv-03902
AUTOMOTIVE STEEL TUBES : 2:16-cv-04002
ACCESS MECHANISMS : 2:16-cv-04102
SIDE DOOR LATCHES : 2:17-cv-04302

This Document Relates to: : Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS :

**DECLARATION OF PIERCE GORE
CONCERNING TIME AND EXPENSES INCURRED BY PRATT AND
ASSOCIATES, P.A.**

I, Pierce Gore, declare as follows:

1. I am Of Counsel at the law firm of Pratt and Associates, P.A. I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above and for which settlements have been presented for final approval. ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities necessary to represent the interests of the Dealership Plaintiffs through the conclusion of this multi-district litigation:

- Claim investigation, legal and factual research, and client communications;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Gathering and producing documents requested by Defendants;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Expert analysis and opinions;
- Class certification;
- Trial preparation;
- Preparation for and court appearances;
- Appeals to the Special Master;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel related to the above tasks.

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the

lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 30, 2019. The summary was prepared at my request from contemporaneous time records regularly prepared and maintained by my firm. Those records are an accurate reflection of the time spent to advance the interests of the Dealership Plaintiffs and have been supplied to Interim Co-Lead Class Counsel pursuant to the billing and expense practices they established at the outset of this litigation.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 includes time spent on cases in this MDL litigation that involve a part for which a settlement has been reached and submitted to the Court for approval.

5. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Pratt and Associates, P.A. in similar complex class action matters and are similar to rates approved for our work by other courts.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 30, 2019 is 382.3 hours. The total lodestar for my firm for this period using current hourly billing rates is **\$324,955.00**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this _____ day of October, 2019 in Novato, California.

DocuSigned by: 10/9/2019
Pierre Gore
[BA657E0A013F480e]
Pierre Gore

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: Pratt and Associates, P.A.

Reporting Period: Inception – September 30, 2019

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Pierce Gore	P	382.3	850.00	\$324,955.00
TOTALS				\$324,955.00

- Partner (P)
- Associate (A)
- Paralegal (PL)
- Legal Administrative Assistant (LAA)

*Lodestar calculated based on current hourly rates.