

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):

AUTOMOTIVE WIRE HARNESSSES;
INSTRUMENT PANEL CLUSTERS;
FUEL SENDERS; OCCUPANT
SAFETY RESTRAINT SYSTEMS;
SWITCHES; STEERING ANGLE
SENSORS; HID BALLASTS,
ALTERNATORS, STARTERS,
IGNITION COILS, MOTOR
GENERATORS, INVERTERS, AIR
FLOW METERS, FUEL INJECTION
SYSTEMS, VALVE TIMING
CONTROL DEVICES, ELECTRONIC
THROTTLE BODIES, RADIATORS,
and ATF WARMERS

: Case No. 12-cv-00102
: Case No. 12-cv-00202
: Case No. 12-cv-00302
: Case No. 12-cv-00602
: Case No. 13-cv-00702
: Case No. 13-cv-01002
: Case No. 13-cv-01102
: Case No. 13-cv-01302
: Case No. 13-cv-01402
: Case No. 13-cv-01502
: Case No. 13-cv-01602
: Case No. 13-cv-01702
: Case No. 13-cv-01802
: Case No. 13-cv-02002
: Case No. 13-cv-02202
: Case No. 13-cv-02402
: Case No. 13-cv-02502
: Case No. 13-cv-02602

This Document Relates to:

: Hon. Marianne O. Battani

ALL DEALERSHIP ACTIONS

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**INTERIM CO-LEAD COUNSEL FOR THE AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND SERVICE AWARDS**

Interim Co-Lead Counsel for the Auto Dealers hereby move the Court, pursuant to Fed. R. Civ. P. 23(h) and 54(d)(2), for an award of attorneys' fees of one-third of the nearly \$59 million in settlement funds (after deduction of a fund future litigation expense and class notice and claims administration expenses), reimbursement of out-of-pocket expenses, the creation of a future litigation expense fund, and service awards for the class representative automobile dealerships.

Dated: October 14, 2015

By: /s/ Gerard V. Mantese
Gerard V. Mantese (P34424)
MANTESE HONIGMAN -, P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203 Facsimile: (248)
457-9201
gmantese@manteselaw.com
dhansma@manteselaw.com
jlushnat@manteselaw.com

Interim Liaison Counsel for the Automobile Dealer Plaintiffs

Jonathan W. Cuneo
Joel Davidow
Victoria Romanenko
Yifei Li
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
jonc@cuneolaw.com
Joel@cuneolaw.com
Vicky@cuneolaw.com
evelyn@cuneolaw.com

Don Barrett
David McMullan
Brian Herrington
BARRETT LAW GROUP, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
Facsimile: (662) 834.2628
dbarrett@barrettlawgroup.com
bherrington@barrettlawgroup.com
dmcmullan@barrettlawgroup.com

Shawn M. Raiter
LARSON KING, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
Facsimile: (651) 312-6618
sraiter@larsonking.com

Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs

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ALL DEALERSHIP ACTIONS	: : :

**AUTO DEALERS' MEMORANDUM IN SUPPORT OF
MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND SERVICE AWARDS**

Gerard V. Mantese (P34424)
Mantese Honigman, P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203
gmantese@manteselaw.com
dhansma@manteselaw.com
jlushnat@manteselaw.com
*Interim Liaison Counsel For The Automobile
Dealer Plaintiffs*

Jonathan W. Cuneo
Joel Davidow
Victoria Romanenko
Yifei Li
Cuneo Gilbert & Laduca, LLP
507 C Street, N.E.
Washington, Dc 20002
Telephone: (202) 789-3960
jonc@cuneolaw.com
joel@cuneolaw.com
vicky@cuneolaw.com
evelyn@cuneolaw.com

Don Barrett
David McMullan
Brian Herrington
Barrett Law Group, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
dbarrett@barrettlawgroup.com
bherrington@barrettlawgroup.com
dmcmullan@barrettlawgroup.com

Shawn M. Raiter
Larson King, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
Facsimile: (651) 312-6618
sraiter@larsonking.com

*Interim Co-Lead Counsel For The Automobile
Dealer Plaintiffs*

Statement of the Issues Presented

1. Should counsel for the Auto Dealers, who have obtained nearly \$59 million in class settlements, be awarded a portion of those settlements for attorneys' fees?
2. Should counsel for the Auto Dealers be reimbursed for the out-of-pocket costs and expenses they have incurred in pursuing the claims in the cases in which settlements have been presented?
3. Should a portion of the settlement funds be used for future expenses incurred on behalf of the Auto Dealers in the cases involved in these settlements?
4. Should the Auto Dealer class representatives receive service awards for their efforts in the cases involved in these settlements?

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Background

After four years of hard-fought litigation, counsel for the Auto Dealers have negotiated and presented settlements totaling nearly \$59 million. While meaningful, these settlements resolve only a portion of the Auto Dealers' claims in this MDL litigation. The settlements provide significant cash and other benefits, like fulsome cooperation from the settling Defendants. All of the net proceeds from these settlements will be paid to eligible new car automobile dealerships—there is no *cy pres* reversion to Defendants or third-party charities.

Auto Dealer class representatives and their counsel have zealously pursued this complex antitrust litigation. Although some Defendants have settled, all Defendants have mounted a spirited defense. And while there were undoubtedly antitrust violations, the Defendants have argued that none of the Plaintiffs suffered an antitrust injury and that no litigation class can be certified. Defendants have admittedly focused on the Auto Dealers as key purchasers of the parts and vehicles that were targeted by the bid-rigging and price-fixing.

The settlements currently before the Court provide substantial benefits to Auto Dealers and are remarkable in light of the formidable opposition from Defendants—even those that pleaded guilty to criminal charges. The Court has seen first-hand much of the work done by the attorneys representing the Auto Dealers. As defense counsel recently noted during a Court status conference, Defendants have sharply focused their discovery efforts on the Auto Dealers. Responding to this discovery—and the discovery that remains ongoing—has consumed an enormous amount of time and resources for Auto Dealers and their counsel.

Auto Dealers and their counsel submit this motion in support of their request for: (1) reimbursement of litigation expenses already incurred in the cases involved in these settlements; (2) leave to establish a fund for future litigation expenses; (3) an award of attorneys' fees; and (4) service

awards for the class representatives. As discussed in this brief, the case law from the Sixth Circuit and other federal courts supports these requests.

Like the percentage-of-the-fund award the Court made for fees granted to the Direct Purchasers, counsel for the Auto Dealers seek a fee award based on a percentage of the nearly \$59 million in settlement funds currently available to eligible members of the Auto Dealer settlement classes. This approach is well-supported in the Sixth Circuit. *See Rawlings v. Prudential-Bache Properties, Inc.*, 9 F.3d 513, 516 (6th Cir. 1993). The award requested—one-third of the settlement fund after certain costs have been deducted—is within the range of fee awards made by courts in this and other Circuits. *See, e.g., In re Prandin Direct Purchaser Antitrust Litig.*, 2015 WL 1396473 (E.D. Mich. Jan. 20, 2015) (awarding one-third of the fund). A lodestar cross-check will confirm that the amount sought is reasonable.

Through the efforts of counsel for the Auto Dealers and the dealerships who serve as named plaintiffs, substantial cash settlements have been obtained. Counsel have pursued the litigation vigorously; succeeded in motion practice; reviewed, analyzed, and coded documents provided by the Defendants; obtained cooperation from certain Defendants; and negotiated beneficial settlements during the four years of litigation since the first Auto Dealer cases were filed. Counsel for the Auto Dealers have substantially advanced the claims of the Auto Dealers on a contingent fee basis.

None of the Auto Dealer settlements before the Court would have been possible without the efforts of the new car automobile dealers who stepped forward to serve as class representatives. Those dealers have advanced the claims of similarly situated dealerships in the face of relentless, and often unjustified, discovery demands. These dealers continue to spend considerable time and resources to respond to Defendants' demands for information about virtually every aspect of their business spanning 15 years. While class representative service awards are routinely made in class action settlements, they are particularly warranted here.

Background

A. Counsel for Auto Dealers Have Committed Significant Resources in this Litigation.

The Court has noted several times that this litigation is unique in its size and complexity. Antitrust litigation is inherently risky, with high stakes, and the outcome of this litigation has been far from certain. From the outset, counsel for the Auto Dealers worked on a contingent basis to advance the claims of automobile dealerships authorized by OEMs to sell new vehicles.

The Department of Justice has described its investigation of the bid-rigging and price-fixing conspiracies at issue here as the largest criminal investigation it has ever undertaken. The DOJ has collected approximately \$2.6 billion in fines from the Defendants. The conduct involves a staggering number of parts, affected models, and conspiring participants. Most of the Defendant groups have had one or more of their corporate affiliates convicted of serious crimes in the United States, Europe, and/or Asia. The list of settling and non-settling Defendants' includes well-known companies that are dominant players in their industries.

The Auto Dealers have asserted damage claims under laws of 30 states and the District of Columbia, as well as a federal claim for injunctive relief. Some states permit indirect purchaser actions under state antitrust laws; other permit them under state consumer protection laws; and others permit them under general laws of restitution. Nearly every Defendant brought a motion to dismiss the Auto Dealers' claims, while others challenged personal jurisdiction. For the most part, the Auto Dealers prevailed on those motions.

Since 2011, many of the attorneys for the Auto Dealers have worked nearly full-time on this litigation. It has been and will continue to be a huge undertaking. Our activities have included:

- Collecting information from a variety of sources, including the Department of Justice indictments, guilty pleas, and evidence that Defendants produced;
- Collecting and analyzing information and discovery;

- Extensive research on the various aspects of the laws of more than 30 states, and drafting and editing complaints;
- Consultation with economic and other liability and damages experts;
- 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 discovery motions and motions to quash;
- 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 approximately 700,000 pages of documents from class representative dealerships;
- Exchanging information and coordinating with end-payor, direct purchaser, truck dealers, City of Richmond, California, Florida, and Ford counsel regarding various issues;
- Attending calls and meetings to help formulate OEM 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;
- Attending MDL status conferences with Judge Battani;

- Performing all the tasks necessary to reach these 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;
- 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
- Drafting notice, claim forms, and other settlement-related documents and consult with the special allocation consultant and claims administrator

(*See generally*, Raiter Decl.)

B. The Auto Dealer Class Representatives Have Provided a Great Service to the Settlement Classes and Have Committed Significant Effort to Respond to Discovery and to Represent Settlement Class Members.

Defense counsel have stated during Court status conferences that the Auto Dealers are the primary target of Defendants' discovery efforts. The Auto Dealer class representatives have already shouldered a substantial burden representing the absent class members to assist in gaining the settlements before the Court. Defendants have made a coordinated effort to put an extreme strain on the dealerships who have acted as representatives of the automobile dealer community to protect the rights of the class members injured by the Defendants' criminal conduct.

Defendants have asked the class representative auto dealers 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. (Raiter Decl.) Defendants have sought documents and data located on any computer, database, or back-up tape anywhere in the dealership, as well as hard copy documents located all over the dealership. (*Id.*) Counsel for the Auto Dealers have had to negotiate these demands with Defendants and have brought and opposed numerous discovery motions.

Defendants have also sought documents and other electronic data from the automobile dealership class representatives, including: (1) 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 OEM 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. (Raiter Decl.)

Defendants pursued this information through the dealers rather than pursue it from their OEM customers, who were the targets of the bid-rigging conspiracies. The dealership class representatives face additional discovery demands and depositions in these cases. The dealership class representatives have met with and communicated with their lawyers many times and have actively participated in the litigation. (Raiter Decl.) They have opened their businesses, provided access to documents and data, have provided nearly 700,000 pages of documents that have been produced to-date, and have turned over sensitive business information. (*Id.*)

C. The Settlements Were Reached After Arms-Length Negotiation and Adversarial Proceedings.

The settlements before the Court were reached after litigation was well underway and were negotiated by experienced counsel on both sides. The settlements were reached through lengthy negotiations of the parties, some of which took many months. (Raiter Decl.) When necessary, the

parties engaged a mediator. (*Id.*) In each case, counsel was armed with transactional data, documents produced in discovery, and a strong understanding of the claims and defenses.

Attorneys' Fees and Expenses Standard of Review

Fed. R. Civ. P. 23(h) provides that “[i]n a certified class action, the court may award reasonable attorney’s fees and non-taxable costs that are authorized . . . by law.” District courts may award reasonable attorneys’ fees and expenses from the settlement of a class action upon motion under Fed. R. Civ. P. 54(d)(2) and 23(h). The court engages in a two-part analysis when assessing the reasonableness of a petition seeking an award of attorneys’ fees. *In re Cardinal Health Inc. Sec. Litig.*, 528 F. Supp. 2d 752, 760 (S.D. Ohio 2007). The court first determines the method of calculating the attorneys’ fees: it applies either the percentage of the fund approach or the lodestar method. *Id.*; *Van Horn v. Nationwide Prop. and Cas. Inc. Co.*, 436 F. App’x 496, 498 (6th Cir. 2011). The court has the discretion to select the appropriate method for calculating attorneys’ fees “in light of the unique characteristics of class actions in general, and of the unique circumstances of the actual cases before them.” *Rawlings*, 9 F.3d at 513, 516. In common fund cases, the award of attorneys’ fees need only “be reasonable under the circumstances.” *Rawlings*, 9 F.3d at 516. The court will then analyze and weigh the six factors described in *Ramey v. Cincinnati Enquirer, Inc.*, 508 F.2d 1188 (6th Cir. 1974). *Id.*

Argument

I. The Court Should Reimburse Class Counsel for Past Expenses and Should Approve the Creation of a Fund for Future Litigation Expenses.

For four years, counsel for the Auto Dealers funded the substantial expenses required to advance the litigation and did so without any guarantee of being reimbursed. Having achieved the settlements currently before the Court, counsel for the Auto Dealers should be returned the litigation expenses incurred to date in the settled cases. Auto Dealers also request that the Court authorize counsel to set aside five per cent of the current settlement proceeds to be used for future litigation expenses in the claims remaining against the non-settling Defendants (for only those

cases included in the current settlements).

A. Reimbursement of Costs Already Incurred.

The Court should award reimbursement the litigation expenses already incurred in the cases involved in the settlements. *See, e.g.*, Fed. R. Civ. P. 23(h); *In re Delphi Corp. Sec. Derivative & ERISA Litig.*, 248 F.R.D. 483, 504 (E.D. Mich. 2008) (“Under the common fund doctrine, class counsel are entitled to reimbursement of all reasonable out-of-pocket litigation expenses and costs in the prosecution of claims and in obtaining settlement, including expenses incurred in connection with document production, consulting with experts and consultants, travel and other litigation-related expenses.” (Citation and internal quotation marks omitted.)); *Cardizem*, 218 F.R.D. at 535; *B & H Med., L.L.C. v. ABP Admin., Inc.*, No. 02–73615, 2006 WL 123785, at *3 (E.D. Mich. Jan.13, 2006).

Counsel for the Auto Dealers have paid \$1,661,946.95 in litigation expenses for the benefit of the settlement class members in the cases with settlements currently before the Court. (*See* Raiter Decl.; Declarations of Don Barrett, Jon Cuneo, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, and Pierce Gore). These costs included experts, document review and hosting for the millions of pages produced in these cases, scanning and preparation of 700,000 pages of dealer documents, travel, and other reasonable litigation expenses. (*Id.*) Counsel for the Auto Dealers incurred these expenses without any guarantee of recovery and should be reimbursed from the settlement funds.

B. Future Litigation Expenses.

The Auto Dealers also request that they be permitted to use a portion of the settlements to create a fund to pay future expenses incurred in the ongoing litigation against the non-settling Defendants (to be used only in cases in which the settlements before the Court were reached). This Court has granted a similar request by the Direct Purchasers and allowing a portion of the settlement funds to be used for future expenses is well-accepted. *See, e.g., In re Packaged Ice Antitrust*

Litig., 08-MD-01952, 2011 WL 717519, at *13-14 (E.D. Mich. Feb. 22, 2011) (approving class counsel's request to use \$750,000 of proceeds from early settlement to pay litigation expenses); *see also* MANUAL (Fourth) at § 13.21 (“[p]artial settlements may provide funds needed to pursue the litigation”).

Counsel for the Auto Dealers request that five per cent (\$2,947,395) be set aside from the settlements and be used to fund future litigation expenses in the cases that continue against non-settling Defendants. *See, e.g., Linerboard Antitrust Litig.*, 292 F. Supp. 2d at 643 (concluding that a partial “settlement provides class plaintiffs with an immediate financial recovery that ensures funding to pursue the litigation against the non-settling defendants”); *Newby v. Enron Corp.*, 394 F.3d 296, 302-03 (5th Cir. 2004) (affirming establishment of a \$15 million litigation expense fund from the proceeds of a partial settlement); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 584 F. Supp. 2d 697, 702 (M.D. Pa. 2008) (approving request for \$500,000 set aside to pay outstanding and future litigation costs); *In re WorldCom, Inc. Sec. Litig.*, 02-civ-3288 (DLC), 2004 WL 2591402, at *22 (S.D.N.Y. Nov. 12, 2004) (creating a \$5 million fund for the continuation of litigation against non-settling defendants).

II. The Court Should Award Attorneys’ Fees to Counsel for the Auto Dealers.

The Court has settlements before it totaling approximately \$59 million for the benefit of the Auto Dealers. Counsel for the Auto Dealers have been litigating these cases on a contingent basis for four years and have already spent thousands of hours in the cases in which settlements have been reached. Counsel for the Auto Dealers request an interim award of attorneys’ fees based on the work done to achieve these settlements.

Interim fee awards are appropriate in large-scale litigation in which settlements are reached periodically. *See In re Air Cargo Shipping Serv. Litig.*, No. 06-md-1775 (JG) (VVP), 2011 WL 2909162, at *5-7 (E.D.N.Y., Jul. 15, 2011) (interim fee award granted); *In re Sterling Foster & Company, Inc. Sec.*

Litig., 238 F. Supp. 2d 480, 484-85, 489-90 (E.D.N.Y. 2002) (interim attorneys' fees awarded). Counsel for the Auto Dealers have already litigated these cases for four years and will continue to vigorously represent the interests of dealerships. *See In re Diet Drugs Prod. Liab. Litig.*, 2002 WL 32154197, at *12 (E.D. Pa., Oct. 3, 2002) (awarding an interim fee after four years of litigation and noting "to make them wait any longer for at least some award would be grossly unfair").

A. The Court Should Use the Percentage-of-the-Fund Approach.

The Supreme Court recognizes that "a litigant or a lawyer who recovers a common fund for the benefit of persons other than himself or his client is entitled to a reasonable attorney's fee from the fund as a whole." *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980); *see also Delphi*, 248 F.R.D. at 502. When calculating attorneys' fees under the common fund doctrine, "a reasonable fee is based on a percentage of the fund bestowed on the class." *Blum v. Stenson*, 465 U.S. 886, 900 n.16 (1984).

The Court awarded fees to the Direct Purchasers using the percentage-of-the-fund approach. Counsel for the Auto Dealers seek the same approach here. Courts in this Circuit prefer this method of awarding attorneys' fees because it eliminates disputes about the reasonableness of rates and hours, conserves judicial resources, and aligns the interests of class counsel and the class members. *See, e.g., Rawlings*, 9 F.3d at 515; *Shane Group, Inc. v. Blue Cross Blue Shield of Michigan*, No. 10-cv-14360, 2015 WL 1498888 at * 15 (E.D. Mich. March 31, 2015) (Page Hood, J.); *In re Packaged Ice Antitrust Litig.*, 08-MDL-01952, 2011 WL 6209188, at *16 (E.D. Mich. Dec. 13, 2011); *Delphi*, 248 F.R.D. at 502; *Cardinal*, 528 F. Supp. 2d at 762 (the Sixth Circuit has "explicitly approved the percentage approach in common fund cases"); *In re Skelaxin (Metaxalone) Antitrust Litig.*, 2014 WL 2946459, *1 (E.D. Tenn. Jun. 30, 2014) ("the lodestar method is cumbersome; the percentage-of-the-fund approach more accurately reflects the result achieved; and the percentage-of-the-fund approach has the virtue of reducing the incentive for plaintiffs' attorneys to over-litigate or 'churn' cases.") (citations omitted).

The lodestar method, on the other hand, “has been criticized for being too time-consuming of scarce judicial resources,” as it requires that courts “pore over time sheets, arrive at a reasonable hourly rate, and consider numerous factors in deciding whether to award a multiplier.” *Rawlings*, 9 F.3d at 516-17. Moreover, “[w]ith the emphasis it places on the number of hours expended by counsel rather than the results obtained, it also provides incentives for overbilling and the avoidance of early settlement.” *Id.* at 517; *see also* Manual for Complex Litigation (Third) § 24.12 at 189 (West 1995). There is a “trend towards adoption of a percentage-of-the-fund method in [common fund] cases.” *Delphi*, 248 F.R.D. at 502 (quoting *Rawlings*, 9 F.3d at 516-517).

B. The Fee Requested by Counsel for the Auto Dealers is Appropriate.

The Court is well-versed with the complexity of this litigation. For only the cases at issue in these settlements, counsel for the Auto Dealers have worked for four years and dedicated more than 41,000 attorney hours and 6,000 hours for paralegals and law clerks.¹ Interim Co-Lead Counsel coordinated the efforts of counsel representing the Auto Dealers to maximize efficiency and to avoid duplication of effort and unnecessary billing. (Raiter Decl.) Interim Co-Lead Counsel for the Auto Dealers also monitored counsel to avoid unauthorized work. (*Id.*)

Counsel for the Auto Dealers request that the Court award fees totaling one-third of the settlement funds remaining after the deduction of: (1) the notice and administration costs, and (2) the costs set aside for future litigation expenses.² Reasonable fee awards range from 20 to 50 per cent of the common fund. *In re Telectronics Pacing Sys., Inc., Accufix Atrial “J” Leads Prods. Liab. Litig.*,

¹ *See* Declarations of Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, and Pierce Gore.

² Although not sought here, precedent supports applying the selected percentage to the settlement fund *before* deducting the litigation costs and expenses from the funds. *See, e.g., In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *17; *Delphi*, 248 F.R.D. at 505 (attorneys’ fees awarded on gross settlement fund); *In re Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 531-535 (E.D. Mich. 2003) (awarding costs in addition to percentage of the fund fee).

137 F.Supp.2d 1029, 1046 (S.D. Ohio 2001); *In re Cincinnati Gas & Elec. Co. Sec. Litig.*, 643 F. Supp. 148, 150 (S.D. Ohio 1986); Alba Conte & Herbert Newberg, *Newberg on Class Actions* (4th ed. 2002), §14:6 at 551 (“Empirical studies show that, regardless whether the percentage method or the lodestar method is used, fee awards in class actions average around one-third of the recovery.”).

Courts in this District routinely approve attorneys’ fees in antitrust class actions of one-third of the common fund created for the settlement class. *In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *19; *Thacker v. Chesapeake Appalachia, L.L.C.*, 695 F. Supp. 2d, 521, 528 (E.D. Ky. 2010); *Bessey v. Packerland Plainwell, Inc.*, No. 4:06-CV-95, 2007 WL 3173972, at *4 (W.D. Mich. 2007); *Delphi*, 248 F.R.D. at 502-03; *In re National Century Financial Enterprises, Inc. Investment Litig.*, 2009 WL 1473975 (S.D. Ohio, May 27, 2009); *Kogan v. AIMCO Fox Chase, L.P.*, 193 F.R.D. 496, 503 (E.D. Mich. 2000). In *Prandin*, the court awarded one-third of a \$19 million settlement fund and in *Skelaxin*, 2014 WL 2946459, at *1, the court awarded one-third of a \$73 million settlement fund, finding that a “counsel fee of one-third is fair and reasonable and fully justified” and “within the range of fees ordinarily awarded.” See also *In re Southeastern Milk Antitrust Litig.*, 2013 WL 2155387, at *8 (E.D. Tenn. May 17, 2013) (one-third fee from settlements totaling \$158.6 million).³

³ The same is true in other districts. See *Standard Iron Works v. Arcelormittal*, 2014 WL 77815572, at *1 (N.D. Ill. Oct. 22, 2014) (attorneys’ fee award of one-third of \$163.9 million settlement); *In re Fasteners Antitrust Litig.*, 2014 WL 296954, *7 (E.D. Pa. Jan. 27, 2014) (“Co-Lead Counsel’s request for one third of the settlement fund is consistent with other direct purchaser antitrust actions.”); *In re Titanium Dioxide Antitrust Litig.*, 2013 WL 6577029, at *1 (D. Md. Dec. 13, 2013) (one-third fee from \$163.5 million fund); *In re Flonase Antitrust Litig.*, 951 F. Supp. 2d 739, 748-52 (E.D. Pa. 2013) (noting that “in the last two-and-a-half years, courts in eight direct purchaser antitrust actions approved one-third fees” and awarding one-third fee from \$150 million fund); *Heekin v. Anthem, Inc.*, No. 05-cv-01908, 2012 WL 5878032 (S.D. Ind. Nov. 20, 2012) (awarding one-third fee from \$90 million settlement fund); *In re Ready-Mixed Concrete Antitrust Litig.*, 2010 WL 3282591, at *3 (S.D. Ind. Aug. 17, 2010) (approving one-third fee); *Williams v. Sprint/United Mgmt. Co.*, 2007 WL 2694029, at *6 (D. Kan., Sept. 11, 2007) (awarding fees equal to 35 per cent of \$57 million common fund); *Lewis v. Wal-Mart Stores, Inc.*, 2006 WL 3505851, at *1 (N.D. Okla., Dec. 4, 2006) (awarding one-third of the settlement fund and noting that a “one-third [fee] is relatively standard in lawsuits that settle before trial.”); *New England Health Care Employees Pension Fund v. Fruit of the Loom, Inc.*, 234 F.R.D. 627, 635 (W.D. Ky. 2006) (“[A] one-third fee from a common fund case has been found to be typical by several courts.”) (citations omitted), *aff’d*, 534 F.3d 508 (6th Cir. 2008); *In re AremisSoft Corp., Sec.*,

Fee awards of more than one-third are also common. *See, e.g., In re Combustion, Inc.*, 968 F. Supp. 1116, 1133, 1142 (W.D. La. 1997) (awarding fee of 36 per cent and noting that “50 percent of the fund is the upper limit on a reasonable fee award from a common fund . . . [D]istrict courts in the Fifth Circuit have awarded percentages of approximately one-third contingency fee”); *In re U.S. Bancorp Litig.*, 291 F.3d 1035, 1038 (8th Cir. 2002) (fee of 36 per cent); *Waters v. Intern. Precious Metals Corp.*, 190 F.3d 1291, 1292-94 (11th Cir. 1999); *In re Vitamins Antitrust Litig.*, 2001 WL 34312839, at *10 (D.D.C. 2001) (awarding one third of \$359 million antitrust recovery, which is “within the fifteen to forty-five percent range established in other cases.”); *In re Ampicillin Antitrust Litig.*, 526 F. Supp. 494, 498 (D.D.C. 1981) (awarding fee of 45 per cent).

C. Consideration Of The Factors Used By The Sixth Circuit Supports The Requested Fees.

Once the Court has selected a method for awarding attorneys’ fees, it will consider the six *Ramey* factors in weighing a fee award in a common fund case: (1) the value of the benefits rendered to the class; (2) society’s stake in rewarding attorneys who produce such benefits in order to maintain an incentive to others; (3) whether the services were undertaken on a contingent fee basis; (4) the value of the services on an hourly basis [the lodestar cross-check]; (5) the complexity of the litigation; and (6) the professional skill and standing of counsel on both sides. *Ramey*, 508 F.2d at 1194-97. When applied here, these factors indicate that the fee requested is fair.

1. Counsel Secured Valuable Benefits For Auto Dealers.

The result achieved for the class members is a principal consideration. *Delphi*, 248 F.R.D. at 503. As discussed in the memoranda filed in support of the preliminary approval of the settlements, counsel for the Auto Dealers have achieved excellent recoveries. These are cash settlements coupled with meaningful cooperation and in some cases injunctive relief. The settlement funds totaling

Litig., 210 F.R.D. 109, 134 (D.N.J. 2002) (“Scores of cases exist where fees were awarded in the one-third to one-half of the settlement fund.”) (citations omitted); *Moore v. United States*, 63 Fed. Cl. 781, 787 (2005) (“one-third is a typical recovery”).

nearly \$59 million represent a significant recovery for automobile dealerships that sell new vehicles in the indirect purchaser states.

After the deduction of fees, notice and claims administration costs, and expenses, all of the net settlement funds will be paid to eligible dealerships that file claims. None of the money will revert to the settling Defendants or to a *cy pres* designee. Minimum payments of \$350 will be made to eligible dealerships that file a claim for new vehicles and parts purchased in the indirect purchaser states. In addition to the money benefits, the cooperation terms of these settlements provide significant value to Auto Dealers in their prosecution of the claims against the non-settling Defendants.

2. Society Has An Important Stake Rewarding Attorneys With Reasonable Fees In This Litigation.

There is a “need in making fee awards to encourage attorneys to bring class actions to vindicate public policy (e.g., the antitrust laws) as well as the specific rights of private individuals.” *In re Folding Carton Antitrust Litig.*, 84 F.R.D. 245, 260 (N.D. Ill. 1979). Courts in the Sixth Circuit weigh “society’s stake in rewarding attorneys who [win favorable outcomes in antitrust class actions] in order to maintain an incentive to others Society’s stake in rewarding attorneys who can produce such benefits in complex litigation such as in the case at bar counsels in favor of a generous fee Society also benefits from the prosecution and settlement of private antitrust litigation.” *In re Cardizem*, 218 F.R.D. at 534 (internal quotation marks omitted); *Delphi*, 248 F.R.D. at 504.

The Department of Justice did not seek restitution from the settling Defendants. Any recovery for Auto Dealers needed to come through the work of lawyers working on a contingent basis. The substantial recoveries counsel for the Auto Dealers have achieved have helped serve the public policy of holding accountable those who violate antitrust laws in the United States. Society benefits when those who have violated laws fostering fair competition and honest pricing are required to reimburse affected consumers in civil proceedings.

3. Counsel For The Auto Dealers Have Worked On A Contingent Basis.

Counsel for the Auto Dealers have and will continue to pursue this litigation on a contingent basis. The risk relating to doing so supports a reasonable fee award from a common fund. *See In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *19 (risk of non-payment a factor supporting the requested fee). The contingency factor “stands as a proxy for the risk that attorneys will not recover compensation for the work they put into a case.” *Cardinal*, 528 F. Supp. 2d at 766. Indeed, “some courts consider the risk of non-recovery as the most important factor in fee determination.” *Kritzer v. Safelite Solutions, LLC*, 2012 WL 1945144, at *9 (S.D. Ohio May 30, 2012) (quoting *Cardinal*, 528 F. Supp. 2d at 766). “[W]ithin the set of colorable legal claims, a higher risk of loss does argue for a higher fee.” *In re Trans Union Corp. Privacy Litig.*, 629 F. 3d 741, 746 (7th Cir. 2011).

Counsel for the Auto Dealers work on a contingent fee basis and advance funds and time associated with the litigation, risking not receiving payment for their work or reimbursement of the out-of-pocket expenses they paid. Being rewarded only for success in litigation this complex creates a high degree of risk. The substantial risk undertaken by counsel for the Auto Dealers further supports the requested attorneys’ fees. *Delphi*, 248 F.R.D. at 503-54.

4. A Lodestar Crosscheck Confirms That The Requested Fee Is Reasonable.

Some courts apply a lodestar “cross-check” on the reasonableness of the fee calculated as a percentage of the fund. *Cardinal*, 528 F. Supp. 2d at 764; *In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *18. A lodestar cross-check is optional, however, and the Court is not required to engage in a detailed scrutiny of time records. *Cardinal*, 528 F. Supp. 2d at 767. The time counsel for the Auto Dealers had to expend confirms that the fee requested is well “aligned with the amount of work the attorneys contributed” to the recovery, and does not constitute a “windfall.” *Id.*

To calculate a reasonable fee under the lodestar method, the court determines the base amount of the fee by multiplying the number of hours counsel reasonably expended by their hourly

rate. *Isabel v. City of Memphis*, 404 F.3d 404, 415 (6th Cir. 2005). The law firms that have worked to advance the claims of the Auto Dealers have done so under the direction of Interim Co-Lead Counsel for the Auto Dealers. There has been an enormous amount of work done. Discovery has been extensive and Defendants have been relentless in their pursuit of discovery and there has been extensive motion practice related to discovery directed at the Auto Dealers. Counsel for the Auto Dealers have received substantial cooperation provided by amnesty applicants and the settling Defendants and are using that information to prosecute the claims against the non-settling Defendants. All the while, counsel for the Auto Dealers have been preparing to certify classes and bring these cases to trial.

Counsel for the Auto Dealers have vigorously prosecuted these case but have done so while being efficient and avoiding duplication. As shown in the declarations submitted with this motion, counsel representing the Auto Dealers and their professional staff have worked more than 47,000 hours in the cases involved in these settlements (up to September 15, 2015). Applying the rates charged by counsel to the hours expended yields a “lodestar” of approximately \$26.1 million.⁴ The requested fee is \$18,500,158, which represents one-third of the funds remaining after deducting the fund for future litigation expenses and the costs of notice and claims administration. (*See* Raiter Decl.)

Whether analyzed as a “cross-check” on the percentage-of-the-fund method—or under the lodestar method—the requested fee is reasonable. The requested fee represents a negative .70 “multiplier” of the lodestar. A fee representing a negative multiplier is reasonable and much lower than the positive multipliers approved in other cases. *See, e.g., Cardinal*, 528 F. Supp. 2d at 767-68 (approving multiplier of 6, and observing that “[m]ost courts agree that the typical lodestar

⁴ The use of current rates is appropriate to compensate counsel for inflation and the delay in receipt of the funds. *Missouri v. Jenkins*, 491 U.S. 274, 282-84 (1989); *see also Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 483 U.S. 711, 716 (1987).

multiplier” on a large class action “ranges from 1.3 to 4.5”); *Prandin*, 2015 WL 1396473, at *4 (3.01 multiplier). The lodestar here is conservative because it does not include the time spent prosecuting these cases since September 15, 2015.⁵

While the hours worked are substantial, they are reasonable and reflect the challenging nature of the litigation. Defendants are represented by able counsel who have asserted vigorous defenses. Defendants’ efforts have required the Auto Dealers to expend considerable effort and skill in prosecuting these cases. Given the excellent results achieved, the complexity of the claims and defenses, the real risk of non-recovery, the formidable defense teams, the delay in receipt of payment, and the substantial experience and skill of counsel, the requested multiplier on the lodestar and the resulting fee is reasonable compensation for the work done by counsel for the Auto Dealers.

5. The Complexity Of The Litigation Supports The Requested Fee.

The Court is well-familiar that “[a]ntitrust class actions are inherently complex” *In re Cardizem*, 218 F.R.D. at 533; *In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *19; *In re Linerboard Antitrust Litig.*, 292 F. Supp. 2d 631, 639 (E.D. Pa. 2003) (“An antitrust class action is arguably the most complex action to prosecute. The legal and factual issues involved are always numerous and uncertain in outcome.”) (citations and internal quotation marks omitted). This litigation is decidedly complex given the numerous conspiracies and parts involved, the international Defendants, and the sheer magnitude of the conduct and regulatory investigations.

6. Skill And Experience Of Counsel.

The skill and experience of counsel on both sides of the litigation is a factor courts consider in determining a reasonable fee award. *In Re Polyurethane Foam Antitrust Litig.*, No. 1:10 MD 2196, 2015 WL 1639269 at * 7; *In re Packaged Ice Antitrust Litig.*, 2011 WL 6219188, at *19. The Court has

⁵ Auto Dealers recognize that this negative multiplier may change as work continues and additional settlements either are, or are not, reached with the non-settling Defendants. The lodestar multiplier may move more negative or may move to a net positive as these cases progress.

found Interim Co-Lead Counsel for the Auto Dealers to have the requisite skill and experience in class action and antitrust litigation to serve effectively as class counsel for the Auto Dealers. In assessing this *Ramey* factor, courts also look to the qualifications of the defense counsel opposing the class. Here, defense counsel are well-qualified and experienced antitrust and class action firms.

III. The Court Should Award Service Payments to the Auto Dealer Class Representatives.

Class representatives are “an essential ingredient of any class action” and incentive awards are appropriate to induce a business or consumer to participate in worthy class action lawsuits. *Cook v. Niedert*, 142 F.3d 1004, 1016 (7th Cir. 2008). “Such “[i]ncentive awards serve an important function, particularly where the named plaintiffs participated actively in the litigation.” *Allapattah Servs., Inc. v. Exxon Corp.*, 454 F. Supp. 2d 1185, 1218 (S.D. Fla. 2006) (citing *Denney v. Jenkins & Gilchrist*, 230 F.R.D. 317, 2005 WL 388562, at *31 (S.D.N.Y. Feb. 18, 2005)).

The Sixth Circuit has noted that incentive awards are typically awarded to class representatives for their extensive involvement with a lawsuit. *Hadix v. Johnson*, 322 F.3d 895, 897 (6th Cir. 2003). Awards encourage members of a class to become class representatives and reward their efforts taken on behalf of the class. *Id.* Payment of incentive awards to class representatives is a reasonable use of settlement funds. *Moulton v. U.S. Steel Corp.*, 581 F.3d 344, 351 (6th Cir. 2009). Larger incentive awards than those to individual plaintiffs have been approved for organizational class representatives because of the greater burden in the course of litigation by producing greater numbers of documents and participating in Rule 30(b)(6) depositions. *See In re Vitamin C Antitrust Litig.*, No. 06–MD–1738, 2012 WL 5289514, at *11 (E.D.N.Y. Oct. 23, 2012).

Interim Co-Lead Counsel for the Auto Dealers request a service award of \$50,000 for each class representative in the cases with settlements currently before the Court. Such an award is well within the Court’s discretion. *See Prandin*, 2015 WL 1396473, at *5 (in a \$19 million settlement, award of \$50,000 to each class representative); *Skelaxin*, 2014 WL 2946459 (settlement of direct

antitrust action, awarding \$50,000 to each class representative); *Connectivity Systems Inc. v. National City Bank*, 2011 WL 292008, at *20 (S.D. Ohio Jan. 26, 2011) (in \$10 million settlement, awarding \$50,000 each to three named plaintiffs); *Liberte Capital Group v. Capwill*, No. 5:99 cv 818, 2007 WL 2492461, at *3 (N.D. Ohio Aug. 29, 2007) (awarding \$97,133.83 and \$95,172.47 to two named plaintiffs representing subclasses that received \$11 million and \$7 million); *Hainey v. Parrott*, No. 1:02-cv-733, 2007 WL 3308027 (S.D. Ohio Nov. 6, 2007) (approving award of \$50,000 for each class representative); *Cardizem*, 218 F.R.D. at 535-36 (awarding \$75,000 to each class representative); *Brotherton v. Cleveland*, 141 F.Supp.2d 907, 913-14 (S.D. Ohio 2001) (granting a \$50,000 service award out of a \$5.25 million fund); *In re Revco Sec. Litig.*, 1992 WL 118800, *7 (N.D. Ohio May 6, 1992) (\$200,000 incentive award to named plaintiff); *Enter. Energy Corp. v. Columbia Gas Transmission Corp.*, 137 F.R.D. 240, 251 (S.D. Ohio 1991) (approving service awards of \$50,000 to six class representatives out of a settlement fund of \$56.6 million).

The class representative dealerships have already sustained a significant discovery burden and will continue to face depositions, additional document discovery for a considerable period of time, and potentially trial. The Auto Dealers have been the target of most of the Defendants' discovery to-date and have been deluged with requests for burdensome and commercially sensitive information. They have located and produced hundreds of thousands of documents during discovery, have shared their knowledge of the industry, and have already spent time and resources during the litigation. Without their efforts, there would be no settlements for Auto Dealers before the Court.

A significant amount of effort from the dealerships has been required to advance this litigation. Such effort requires the dealers to devote employee time away from the day-to-day demands of running their businesses. Service awards are intended to relieve some of this burden and are well-justified in litigation as lengthy and complex as the cases before the Court.

Conclusion

For the foregoing reasons, Interim Co-Lead Counsel for the Auto Dealers respectfully request that the Court grant their motion and award attorneys' fees, reimburse litigation expenses, allow the creation of a future litigation fund, and issue class representative service awards.

Dated: October 14, 2015

By: /s/ Gerard V. Mantese
Gerard V. Mantese (P34424)
MANTESE HONIGMAN -, P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203 Facsimile: (248) 457-9201
gmantese@manteselaw.com
dhansma@manteselaw.com
jlushnat@manteselaw.com

Interim Liaison Counsel for the Automobile Dealer Plaintiffs

Jonathan W. Cuneo
Joel Davidow
Victoria Romanenko
Yifei Li
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
jonc@cuneolaw.com
Joel@cuneolaw.com
Vicky@cuneolaw.com
evelyn@cuneolaw.com

Don Barrett
David McMullan
Brian Herrington
BARRETT LAW GROUP, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
Facsimile: (662) 834.2628
dbarrett@barrettlawgroup.com
bherrington@barrettlawgroup.com
dmcmullan@barrettlawgroup.com

Shawn M. Raiter
LARSON KING, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
Facsimile: (651) 312-6618
sraiter@larsonking.com

Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs

CERTIFICATE OF SERVICE

I, Gerard V. Mantese, hereby certify that I caused a true and correct copy of **INTERIM LEAD AND LIAISON COUNSEL'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION COSTS AND EXPENSES** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on October 14, 2015

/s/ Gerard V. Mantese
Gerard V. Mantese

**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
	:	
	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
PRODUCT(S):	:	Case No. 12-cv-00602
	:	Case No. 13-cv-00702
AUTOMOTIVE WIRE HARNESES;	:	Case No. 13-cv-01002
INSTRUMENT PANEL CLUSTERS;	:	Case No. 13-cv-01102
FUEL SENDERS; OCCUPANT SAFETY	:	Case No. 13-cv-01302
RESTRAINT SYSTEMS; SWITCHES;	:	Case No. 13-cv-01402
STEERING ANGLE SENSORS; HID	:	Case No. 13-cv-01502
BALLASTS, ALTERNATORS,	:	Case No. 13-cv-01602
STARTERS, IGNITION COILS, MOTOR	:	Case No. 13-cv-01702
GENERATORS, INVERTERS, AIR	:	Case No. 13-cv-01802
FLOW METERS, FUEL INJECTION	:	Case No. 13-cv-02002
SYSTEMS, VALVE TIMING CONTROL	:	Case No. 13-cv-02202
DEVICES, ELECTRONIC THROTTLE	:	Case No. 13-cv-02402
BODIES, RADIATORS, and ATF	:	Case No. 13-cv-02502
WARMERS	:	Case No. 13-cv-02602
	:	
	:	
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, REIMBURSEMENT OF
LITIGATION EXPENSES, AND SERVICE AWARDS**

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, Reimbursement of Litigation Expenses, and Service Awards. 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 firms representing the Auto Dealers has 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 millions of dollars of expenses and time devoted in the pursuit of the cases involved in the settlements currently before the Court.

3. This is a decidedly complex litigation, a point the Court itself has acknowledged. There are approximately 40 Auto Dealer class representatives who are pursuing money damage claims in 30 states and the District of Columbia. There are now dozens of different cases related to different parts (or type of part) involved in a bid-rigging and price-fixing conspiracy involving the Defendants. Just last week, the Department of Justice announced three new indictments of Japanese executives involving auto body sealing products installed in U.S. cars, parts which are not yet at issue in this litigation. See <http://www.justice.gov/opa/pr/three-japanese-auto-parts-executives-indicted-bid-rigging> conspiracy-involving-body-sealing.

4. Since 2011, a number of the attorneys working on behalf of the Auto Dealers have worked nearly full-time on this litigation. It has been and will continue to be a huge undertaking. To-date, our activities have included:

- Collecting information from a variety of sources, including the Department of Justice indictments, guilty pleas, and evidence that Defendants produced;
- Collecting and analyzing information and discovery in the cases with settlements;
- Extensive research on the various aspects of the laws of more than 30 states, drafting and editing complaints;
- Consultation with economic and other liability and damages experts;
- 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, attend 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 discovery motions and motions to quash;
- 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 approximately 700,000 pages of documents from class representative dealerships;
- Exchanging information and coordinating with end-payor, direct purchaser, truck dealers, City of Richmond, California, Florida, and Ford counsel regarding various issues;
- Attend calls and meetings to help formulate OEM subpoenas and discovery from third-parties;
- Respond 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;
- Attending MDL status conferences with Judge Battani;
- Perform all the tasks necessary to reach these settlements, including formulating demands, negotiating, in some cases mediation, dozens of in-person meetings, exchange of drafts, preparing escrow agreements;
- Draft settlement agreements, preliminary approval motions, and in some cases attend and argue preliminary approval motions;
- Receive 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
- Draft notice, claim forms, and other settlement-related documents and consult with the special allocation consultant and claims administrator

5. It is clear from both the actions of defense counsel and statements they have made in status conferences and other settings in this litigation that Defendants are focusing much of their discovery efforts at the Auto Dealers and the representative dealership plaintiffs.

6. Defendants have asked the class representative auto dealers 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 have sought documents and data located on any computer, database, or back-up tape anywhere in the dealership, as well as hard copy documents located all over the dealership. Counsel for the Auto Dealer have had to negotiate these demands with Defendants and have brought and opposed numerous discovery motions.

7. Defendants have 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 OEM 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.

8. Defendants have pursued this information from the Auto Dealers rather than pursuing it from Defendants' own OEM customers, who were the targets of the bid-rigging conspiracies.

9. The dealership class representatives face additional discovery demands and depositions in these cases. The dealership class representatives have met with and communicated

with their lawyers many times and have actively participated in the litigation. They have opened their businesses, provided access to documents and data, have provided nearly 700,000 pages of documents that have been produced to-date, and have turned over sensitive business information.

10. The discovery in these cases continues and the non-settling Defendants continue to issue new discovery demands. Non-settling Defendants in other cases are beginning to serve discovery on the Auto Dealers as well.

11. The Court has before it settlements totaling nearly \$59 million for the benefit of eligible Auto Dealers. The settlements were reached after litigation was well underway and 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 mediator. In each case 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.

12. The Court is well-versed with the complexity of this litigation. For only the cases at issue in these settlements, counsel for the Auto Dealers have dedicated thousands of attorney hours and hours for paralegals and law clerks. 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. Interim Co-Lead Counsel for the Auto Dealers also monitored the work to avoid unauthorized or unnecessary work.

13. 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.

14. The Declarations of Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, 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.

15. 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 have invested this time for four years and have not been paid for their work.

16. Counsel for the Auto Dealers have also invested approximately \$1,661,945 of their own money to pay for litigation expenses in 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 700,000 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.

17. 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 Don Barrett has 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 Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, and Pierce Gore. The firms do, however, request reimbursement of the assessments and their related expenses as part of this motion and those assessments are included in the requested \$1,661,945 reimbursement.

18. Interim Co-Lead Counsel for the Auto Dealers also request that the Court authorize them to set aside five per cent of the current settlement proceeds (\$2,947,395) to be used for future litigation expenses in the claims remaining against the non-settling Defendants (to be used only in those cases included in the current settlements). Having this money available to help adequately fund the litigation against the non-settling Defendants will maximize the likelihood of success for the Auto Dealers.

19. Interim Co-Lead Counsel for the Auto Dealers also request that the Court grant service awards of \$50,000 to each of the class representative dealerships in the operative complaints in the cases with settlements currently before the Court. These dealerships have already sustained a significant discovery burden and will continue to face depositions and additional document discovery for a considerable period of time. The Auto Dealer plaintiffs have been the target of most of the Defendants' discovery to-date and have been deluged with requests for burdensome and commercially sensitive information. They have located and produced hundreds of thousands of documents during discovery, have shared their knowledge of the industry, and have already spent a great deal of time and resources during the litigation. Without their efforts, there would be no settlements for Auto Dealers before the Court.

20. As set forth in the declarations of Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, and Pierce Gore, counsel for the Auto Dealers have advanced \$1,661,945.95 in litigation costs in the cases with settlements currently before the Court.

21. As set forth in the declarations of Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, and Pierce Gore, counsel for the Auto Dealers have worked for four years and have worked more than 41,000 attorney hours and more than 6,000 hours for paralegals and law clerks in the cases with settlements currently

before the Court. Applying the rates charged by counsel to the hours expended yields a “lodestar” of approximately \$26.1 million through September 15, 2015.

22. The development, implementation, and delivery of the notice plan for the settlements before the Court and the administration of claims (if the the settlements are granted final approval) are expected to cost approximately \$500,000.

23. Interim Co-Lead Counsel for the Auto Dealers respectfully request a fee award equal to one-third of the settlements, after the deduction of the fund for future litigation expense and the cost of class notice and claims administration. That calculation is: $(58,947,900 - 2,947,395 - 500,000) / 3 = 18,500,168$.

24. The \$18,500,168 fee award Interim Co-Lead Counsel for the Auto Dealers respectfully requests represents approximately .70 of the the current lodestar in the cases involved in these settlements and 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 14th day of October, 2015 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):

AUTOMOTIVE WIRE HARNESSSES;
INSTRUMENT PANEL CLUSTERS;
FUEL SENDERS; OCCUPANT
SAFETY RESTRAINT SYSTEMS;
SWITCHES; STEERING ANGLE
SENSORS; HID BALLASTS,
ALTERNATORS, STARTERS,
IGNITION COILS, MOTOR
GENERATORS, INVERTERS, AIR
FLOW METERS, FUEL INJECTION
SYSTEMS, VALVE TIMING
CONTROL DEVICES, ELECTRONIC
THROTTLE BODIES, RADIATORS,
and ATF WARMERS

: Case No. 12-cv-00102
: Case No. 12-cv-00202
: Case No. 12-cv-00302
: Case No. 12-cv-00602
: Case No. 13-cv-00702
: Case No. 13-cv-01002
: Case No. 13-cv-01102
: Case No. 13-cv-01302
Case No. 13-cv-01402
Case No. 13-cv-01502
Case No. 13-cv-01602
Case No. 13-cv-01702
Case No. 13-cv-01802
Case No. 13-cv-02002
Case No. 13-cv-02202
Case No. 13-cv-02402
Case No. 13-cv-02502
Case No. 13-cv-02602

This Document Relates to:

:
: Hon. Marianne O. Battani
:
:

ALL DEALERSHIP ACTIONS

:

**DECLARATION OF DON BARRETT IN SUPPORT OF
AUTOMOBILE DEALERS INTERIM LEAD COUNSEL'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Don Barrett, declare as follows:

1. I am the senior and managing partner of Barrett Law Group, P.A. I submit this declaration in support of Automobile Dealers Interim Lead Counsel's motion for an award of attorneys' fees in connection with the services rendered, and costs and expenses incurred, in the above styled and numbered cases (the "Actions").
2. I am one of the Co-Lead Interim Class Counsel for the Automobile Dealer Plaintiffs in the Actions.
3. I have acted as treasurer of the Automobile Dealer Plaintiffs Class Counsel and in that capacity have maintained and administered a litigation fund for the Automobile Dealer Plaintiffs for all of the cases in this MDL. In this capacity I make 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 as for experts, e-discovery vendors, special master expenses, copy services, and translations services.
4. To date a total of \$1,168,794.56 has been collected for this litigation fund. Of that amount, a total of \$983,635.30 has been spent by the litigation fund for common expenses in connections with the Actions. All of such expense payments were reasonable and necessary for the prosecution of the Actions.
5. Attached as Exhibit A is an itemization of the litigation fund expenses which have been paid for the Actions.
6. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 30th day of September, 2015.



Don Barrett
BARRETT LAW GROUP, PA
404 Court Square North
Lexington, MS 39095
Office 662.834.9168
Home 662.834.3044
Cell 850.797.2574
donbarrettpa@gmail.com

EXHIBIT A

		Auto Wire Specific Case Expense			
Fuel Senders					
5/24/2013	5787	Consultant	Translations		\$6,025.00
12/12/2013	6005	Epiq eDiscovery	hosting database		\$134.40
1/13/2014	6050	Epiq eDiscovery	hosting database		\$134.40
1/22/2014	6054	Epiq eDiscovery	hosting database		\$134.40
2/26/2014	6094	Epiq eDiscovery	hosting database		\$134.40
3/12/2014	6106	Epiq eDiscovery	hosting database		\$134.40
5/29/2014	6185	Epiq eDiscovery	hosting database		\$89.60
6/19/2014	6203	Epiq eDiscovery	hosting database		\$89.60
7/14/2014	6227	Epiq eDiscovery	hosting database		\$3.78
9/4/2015	6267	Epiq eDiscovery	hosting database		\$3.78
10/1/2014	6303	Epiq eDiscovery	hosting database		\$3.78
12/18/2014	6392	Epiq E Discovery	hosting database		\$3.78
2/9/2015	6430	Epiq eDiscovery	4 invoices hosting database		\$145.74
2/16/2015	6448	Epiq eDiscovery	hosting database		\$3.78
3/30/2001	6500	Epiq eDiscovery	hosting database		\$5.86
4/16/2015	6517	Epiq eDiscovery	hosting database		\$3.78
7/2/2015	6596	Epiq eDiscovery	hosting database		\$7.56
9/29/2015	6715	Epiq eDiscovery	hosting database		\$7.56
		Total Fuel Senders			\$7,065.60

General					
03/27/12	5455	Cuneo, Gilbert, Laduca	reimb for transcript		\$125.00
05/25/12	5541	Cuneo, Gilbert, Laduca	reimburse for translation		\$1,215.00
11/29/12	5649	Consultant	Hosting database		\$5,197.95
01/03/13	5686	Expert	retainer		\$2,500.00
01/17/13	5690	Consultant	Hosting database		\$5,455.70
03/11/13	5718	Consultant	Translations		\$9,272.80
03/18/13	5725	Consultant	Translations		\$825.00
5/24/2013	5787	Consultant	Translations		\$9,272.80
9/13/2013	5893	Kohn, Swift & Graf	direct purchaser reimbursement - cost of analytics		\$12,618.75
9/13/2013	5894	Cotchett, Pitre & McCarthy	direct purchaser reimbursement - cost of analytics		\$12,618.75
4/17/2014	6134	Cotchett, Pitre & McCarthy	Mediation fee		\$3,550.97
5/30/2014	6187	SecurShred	copying documents Acura and Honda dealer in VT		\$7,775.50

6/9/2014	6196	Computing Source	scanning and copying documents Patsy Lou Chevrolet		\$6,254.61
7/2/2014	6218	Merrill Communications	ESI processing and hosting		\$1,847.39
7/14/2014	6225	SecurShred	copying documents VT		\$3,449.05
8/1/2014	6242	Lee Toyota of Topsham	copying documents		\$5,895.77
10/9/2015	6316	Pryntcomm	scanning documents Beck Motors		\$1,568.80
10/9/2014	6317	Abbott Nicholson	1/3 Special Master		\$416.66
10/23/2014	6325	Robert Half Legal	scanning documents		\$4,424.99
11/5/2014	6340	Abbott Nicholson	Special Master		\$2,125.00
11/6/2014		Abbott Nicholson	refund		-\$104.16
11/12/2014	wire	Expert	retainer		\$3,000.00
12/18/2014	6391	Merrill Communications	ESI processing and hosting		\$29,837.02
12/18/2014	6393	Bonneville & Son	scanning and copying documents		\$3,483.25
12/29/2014	6396	Aoha Data Services	scanning - Windward		\$18,110.86
1/6/2015	6401	Abbott Nicholson			\$3,875.00
2/9/2015	6429	Merrill Communications	ESI processing and hosting		\$28,417.55
2/16/2015	6448	Epiq eDiscovery	Hosting database		\$4,934.06
2/16/2015	6449	Merrill Communications	ESI processing and hosting		\$1,993.17
5/28/2015	6555	Reno Dodge Sales Inc.	copying documents		\$5,300.00
6/8/2015	6564	Abbott Nicholson			\$3,925.00
6/17/2015		Cotchett, Pitre & McCarthey	refund Esshaki bill fro Depo Protocol		-\$1,962.50
6/23/2015	6591	Expert			\$4,250.00

6/30/2015	6594	Aloha Data Services	Honda Windward scanning and copying documents		\$600.31
7/9/2015	6604	Expert	retainer \$10,000.00 invoices \$3026.00		\$13,026.00
7/14/2015	6631	Consultant			\$40,000.00
7/14/2015	6632	LEE GMC Honda	scanning and copying documents		\$631.80
7/14/2015	6633	Lee Management Co	scanning and copying documents		\$1,037.50
7/23/2015	wire	Abbott Nicholson			\$12,000.00
7/23/2015	6650	John Greene Chyrsler	scanning and copying documents		\$200.00
9/3/2015	6688	Naegeli	scanning and copying documents		\$2,956.95
9/3/2015	6689	Abbott Nicholson			\$7,650.00
9/3/2015	6690	Cotchett, Pitre & McCarthy	Reimburse for Translations		\$13,025.25
9/3/2015	6691	RAC & Associates	copying documents - Dale Martens Nissan- Suburu		\$498.84
		Total General			\$293,096.39
Instrument Panel Clusters					
12/12/2013	6005	Epiq eDiscovery Solutions	hosting database		\$1,071.00
1/13/2014	6050	Epiq eDiscovery Solutions	hosting database		\$1,071.00

1/22/2014	6054	Epiq eDiscovery Solutions	hosting database		\$1,071.00
2/26/2014	6094	Epiq eDiscovery Solutions	hosting database		\$1,071.00
3/12/2014	6106	Epiq eDiscovery Solutions	hosting database		\$1,071.00
5/29/2014	6185	Epiq eDiscovery Solutions	hosting database		\$1,237.20
6/19/2014	6203	Epiq eDiscovery Solutions	hosting database		\$1,237.20
7/14/2014	6227	Epiq eDiscovery Solutions	hosting database		\$304.80
9/4/2014	6267	Epiq eDiscovery Solutions	hosting database		\$304.80
10/1/2014	6303	Epiq eDiscovery Solutions	hosting database		\$305.18
12/18/2014	6392	Epiq eDiscovery Solutions	hosting database		\$305.18
2/9/2015	6430	Epiq eDiscovery Solutions	4 invoices		\$1,986.52
2/16/2015	6448	Epiq eDiscovery Solutions	hosting database		\$305.16
3/30/2015	6500	Epiq eDiscovery Solutions	hosting database		\$328.70
4/16/2015	6517	Epiq eDiscovery Solutions	hosting database		\$305.16
7/2/2015	6596	Epiq eDiscovery Solutions	hosting database		\$610.32
9/29/2015	6715	Epiq eDiscovery Solutions	hosting database		\$610.32
		Total Instrument Panel Cluster			\$13,195.54

Occupant Safety					
04/09/13	5743	Expert	Occupant Safety		\$6,443.00
12/19/12	5668	Consultant	Translations		\$19,358.51
05/07/13	5771	Expert	Occupant Safety		\$1,689.12
07/16/13	5834	Consultant	Translations		\$12,586.51
02/09/15	6430	Epiq eDiscovery	4 invoices		\$280.59
02/16/15	6448	Epiq eDiscovery	hosting database		\$283.45
04/16/15	6517	Epiq eDiscovery	hosting database		\$283.45
07/02/15	6596	Epiq eDiscovery	hosting database		\$579.08
		Total Occupant Safety			\$41,503.71
Wire Harness Systems					
04/16/13	5756	Epiq eDiscovery Solutions, Inc.	hosting database		\$5,667.80
06/10/13	5803	Expert	Wire Harness Systems		\$2,280.00
6/14/2013	5805	Epiq eDiscovery Solutions, Inc.	hosting database		\$24,856.24

6/14/2013	5806	Expert	Wire Harness Systems		\$1,500.00
7/2/2013	5817	Epiq eDiscovery Solutions, Inc.	hosting database		\$6,826.60
7/22/2013	5843	Epiq eDiscovery Solutions, Inc.	hosting database		\$6,826.60
8/13/2013	5872	Epiq eDiscovery Solutions, Inc.	hosting database		\$6,826.00
10/9/2013	5953	Expert	Wire Harness Systems		\$10,749.21
10/9/2013	5960	Epiq eDiscovery Solutions, Inc.	hosting database		\$7,034.40
11/11/2013	5980	Expert	Wire Harness Systems		\$1,566.00
12/13/2013	6005	Epiq eDiscovery Solutions, Inc.	hosting database		\$7,126.30
12/13/2013	6007	Expert	Wire Harness Systems		\$2,577.67
1/13/2014	6050	Epiq eDiscovery Solutions	hosting database		\$7,435.60
1/22/2014	6054	Epiq eDiscovery Solutions	hosting database		\$14,400.85
02/26/14	6094	Epiq eDiscovery Solutions, Inc.	hosting database		\$7,520.60
03/12/14	6105	Merrill Communications	Wire Harness Systems		\$5,974.39
03/12/14	6106	Epiq eDiscovery Solutions, Inc.	hosting database		\$7,520.60
3/12/2014	6108	Expert	Wire Harness Systems		\$5,524.50
4/3/2014	6121	Merrill Communications	ESI processing and hosting		\$44,033.74

4/3/2014	6122	Lee GMC Honda	Wire Harness Systems copying and scanning documetns		\$1,485.00
4/3/2014	6123	Prolegal Copies, inc	copying and scanning documents Hudson Nissan		\$722.88
5/12/2014	6170	Expert	Wire Harness Systems		\$4,676.25
5/29/2014	6184	Merrill Communications	Wire Harness Hudson \$1041.93; Wire Harness \$2663.27 ESI processing and hosting		\$3,705.20
5/29/2014	6185	Epiq eDiscovery Solutions, Inc.	hosting database		\$7,933.90
6/19/2014	6201	Merrill Communications	ESI processing and hosting		\$6,762.85
6/19/2014	6203	Epiq eDiscovery	hosting database		\$3,472.40
6/19/2014	6203	Epiq eDiscovery	hosting database		\$2,540.00
6/19/2014	6203	Epiq eDiscovery	hosting database		\$1,782.00
7/14/2014	6227	Epiq eDiscovery	hosting database		\$3,472.40
7/14/2014	6227	Epiq eDiscovery	hosting database		\$1,782.00
7/14/2014	6227	Epiq eDiscovery	hosting database		\$3,258.50
8/11/2014	6252	Computing Source	scanning documents Patsy Lou Chevrolet		\$6,684.67
9/3/2014	6269	Merrill Communications	ESI processing and hosting		\$2,256.07
9/4/2014	6267	Epiq Ediscovery	hosting database		\$3,472.40
9/4/2014	6267	Epiq Ediscovery	hosting database		\$1,782.00
9/4/2014	6267	Epiq eDiscovery	hosting database		\$2,594.00
9/10/2014	6279	Expert			\$19,523.25

10/1/2014	6303	Epiq eDiscovery Solutions, Inc.	hosting database		\$3,472.40
10/1/2014	6303	Epiq eDiscovery Solutions, Inc.	hosting database		\$1,782.00
10/1/2014	6303	Epiq eDiscovery	hosting database		\$440.00
10/1/2014	6303	Epiq eDiscovery	hosting database		\$2,573.00
10/1/2014	6304	Consultant	scanning, fields and load file creations and upload data for Merrill communications		\$9,422.15
10/29/2014	6334	Merrill Communications	ESI processing and hosting		\$1,781.04
11/11/2014	6354	Expert			\$3,483.63
11/11/2014	6355	Merrill Communications	ESI processing and hosting		\$20,668.78
11/19/2014	6362	Robert Half Legal	scanning and copying documents		\$12,816.30
12/1/2014	6373	Prolegal Copies, inc	copying and scanning documents Hudson Nissan		\$9,965.62
12/18/2014	6392	Epiq eDiscovery	hosting database		\$7,502.20
2/9/2015	6430	Epiq eDiscovery	hosting database		\$32,178.24
2/16/2015	6448	Epiq eDiscovery Solutions, Inc.	hosting database		\$3,525.03
2/16/2015	6449	Merrill Communications	ESI processing and hosting		\$106.58
2/16/2015	6449	Merrill Communications	ESI processing and hosting		\$8,566.65
3/23/2015	6486	Consultant			\$770.00
3/23/2015	6487	Cotchett, Pitre & McCarthey	reimbursement for Master Esshaki invoice		\$518.75

3/23/2015	6488	Robert A Cash	copying and scanning documents for Frank Honda		\$10,240.20
3/23/2015	6489	Merrill Communications	ESI processing and hosting		\$3,390.00
3/30/2015	6500	Epiq eDiscovery	hosting database		\$9,459.22
4/16/2015	6517	epiq eDiscovery	hosting database		\$8,956.68
6/15/2015		Merrill Communications	refund overpaymetn		-\$8,566.65
7/2/2015	6596	Epiq eDiscovery			\$19,078.14
7/9/2015	6601	Bill Pearce Courtsey Honda	copying and scanning documents		\$3,500.00
7/9/2015	6602	Merrill Communications	ESI processing and hosting		\$12,774.55
7/9/2015	6603	Expert			\$61,002.71
7/14/2015	6634	Expert			\$5,097.75
8/3/2015	6665	JAMS			\$5,303.40
9/3/2015	6686	Consultant	video editing		\$1,007.00
9/3/2015	6692	Frank Ancona Honda	scanning and copying document		\$2,655.38
9/16/2015	6707	Expert			\$21,032.47
9/29/2015	6711	Computing Source	Hodges Subaru Documents		\$6,989.74
9/29/2015	6712	Consultant	data processing		\$2,625.00
9/29/2015	6713	DTI	hosting, scanning		\$35,852.52
9/29/2015	6714	Expert			\$942.00
9/29/2015	6715	Epiq eDiscovery Solutions, Inc.	hosting database		\$44,489.21
		Total Wire Harness			\$619,554.56
ALTERNATORS					

8/12/2013	5867	Consultant	Translations		\$2,122.50
		Total Alternators			\$2,122.50
Radiators					
8/12/2013	5867	Consultant	Translations		\$2,122.50
10/23/2014	6326	Expert			\$2,852.00
		Total Radiators			\$4,974.50
Starters					
8/12/2013	5867	Consultant	Translations		\$2,122.50
		Total Starters			\$2,122.50
			Total		\$983,635.30

**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

: Case No. 12-cv-00102

: Case No. 12-cv-00202

: Case No. 12-cv-00302

PRODUCT(S):

: Case No. 12-cv-00602

: Case No. 13-cv-00702

AUTOMOTIVE WIRE HARNESSSES;

: Case No. 13-cv-01002

INSTRUMENT PANEL CLUSTERS;

: Case No. 13-cv-01102

FUEL SENDERS; OCCUPANT

: Case No. 13-cv-01302

SAFETY RESTRAINT SYSTEMS;

: Case No. 13-cv-01402

SWITCHES; STEERING ANGLE

: Case No. 13-cv-01502

SENSORS; HID BALLASTS,

Case No. 13-cv-01602

ALTERNATORS, STARTERS,

Case No. 13-cv-01702

IGNITION COILS, MOTOR

Case No. 13-cv-01802

GENERATORS, INVERTERS, AIR

Case No. 13-cv-02002

FLOW METERS, FUEL INJECTION

Case No. 13-cv-02202

SYSTEMS, VALVE TIMING

Case No. 13-cv-02402

CONTROL DEVICES, ELECTRONIC

Case No. 13-cv-02502

THROTTLE BODIES, RADIATORS,

Case No. 13-cv-02602

and ATF WARMERS

This Document Relates to:

: Hon. Marianne O. Battani

ALL DEALERSHIP ACTIONS

:

**DECLARATION OF GERARD 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 Honigman, PC and am currently Interim

Liason Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership

Plaintiffs"). I submit this declaration in support of Interim 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 in this Autoparts Antitrust Litigation ("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, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim 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 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 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. 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.

5. My firm has expended a total of \$34,258.60 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 2,277.05 hours. The total lodestar for my firm for this period using current hourly billing rates is \$951,245.00

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

Executed this the 8th day of October, 2015 in Troy, Michigan.


/s/ GERARD MANTESE

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: MANTESE HONIGMAN, PC****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Gerard Mantese	P	509.2	\$650.00	\$330,980.00
David Honigman	P	18.6	\$650.00	\$12,090.00
Mark Rossman	P	0.7	\$425.00	\$297.50
Ian Williamson	P	0.8	\$425.00	\$340.00
Theresamarie Mantese	P	7	\$425.00	\$2,975.00
Brian Saxe	P	4.1	\$350.00	\$1,435.00
David Hansma	A	121.45	\$350.00	\$42,507.50
Joshua Lushnat	A	184.65	\$350.00	\$64,627.50
Brenden Frey	A	1085.45	\$350.00	\$379,907.50
Kathryn Eisenstein	A	125.2	\$350.00	\$43,820.00
Alex Blum	A	113.6	\$350.00	\$39,760.00
Krista Hosmer	A	5.2	\$350.00	\$1,820.00
Fatima Mansour	A	5	\$350.00	\$1,750.00
Tishia Browning	A	50.6	\$350.00	\$17,710.00
James Buster	LC	10	\$250.00	\$2,500.00
Jonathan Ajlouny	LC	34	\$250.00	\$8,500.00
Paralegal	PL	1.5	\$150.00	\$225.00
TOTALS		2,277.05		\$951,245.00

P = Partner
C = Counsel
A = Associate
LC = Law Clerk
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: MANTESE HONIGMAN, PC

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$1,515.84
Postage Charges	\$1,211.82
Facsimile Charges	0
Long Distance	\$
In-House Photocopying	\$8,220.15
Outside Photocopying	0
Travel (Transporation, lodging, meals, etc.)	\$4,884.04
Court Fees (filing, etc.)	\$14,486.00
Professional Fees (expert/investigators, etc.)	0
Witness/Service Fees	0
Court Reporter/Transcripts	\$160.05
Computer Research	\$2,069.02
Miscellaneous (Describe)	\$1,711.68
TOTAL	\$34,258.60

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

LODESTAR SUMMARY

Firm: Mantese Honigman, PC
Case: Air Flow Meters
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650		
Brian Saxe	P	\$350		
Brendan Frey	A	\$350		
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Air Flow Meters
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	1.8
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$401.80

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.50	325
Brendan Frey	A	\$350	5.20	1,820
Kate Eisenstein	A	\$350	1.0	350
Joshua Lushnat	A	\$350		
TOTALS				\$2,495

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Alternators
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	350
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	.80
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$350.80

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **ATF Warmers**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650		
Brian Saxe	P	\$350		
Brendan Frey	A	\$350	.30	105
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				\$105

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: ATF Warmers
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
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	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$400

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650		
Brian Saxe	P	\$350		
Brendan Frey	A	\$350		
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
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	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	400

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Fuel Injection Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650		
Brian Saxe	P	\$350		
Brendan Frey	A	\$350	8.10	2,835
David Hansma	A	\$350	1.0	350
Joshua Lushnat	A	\$350	.40	140
TOTALS				\$3,325

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Fuel Injection Systems
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
Delivery Services/Messengers	225.40
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	74.70
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	3.60
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$703.70

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Fuel Senders**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	2.8	1,820
Brendan Frey	A	\$350	31.50	11,025
David Hansma	A	\$350	5.0	1,750
Kate Eisenstein	A	\$350	.50	175
TOTALS				\$14,770

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Fuel Senders**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	1200
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	32.74
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	11.90
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$1,244.64

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Auto Parts General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	296.50	192,725.00
David Honigman	P	\$650	18.60	12,090.00
Mark Rossman	P	\$425	.70	297.50
Ian Williamson	P	\$425	.80	340.00
Brian Saxe	P	\$350	1.90	665.00
Alex Blum	A	\$350	29.10	10,185.00
Brendan Frey	A	\$350	414.50	145,075.00
David Hansma	A	\$350	35.10	12,285.00
Joshua Lushnat	A	\$350	91.45	32,007.50
Kate Eisenstein	A	\$350	48.10	16,835.00
Tishia Browning	A	\$350	6.7	2,345.00
Fatima Mansour	A	\$350	1	350.00
Jennifer Brennan	PL	\$150	1.5	150.00
TOTALS				\$425,350.00

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Auto Parts General
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	4336.00
Delivery Services/Messengers	437.38
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	432.07
Litigation Support Vendors	
Local Counsel	
Travel	4314.91
Long Distance Telephone Expense	
Meals	331.22
Online Research	1355.13
Other	56.68
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	7384.15
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	18,647.54

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **HID Ballasts**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.30	195
Brendan Frey	A	\$350	1.40	490
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				\$685

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **HID Ballasts**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	800
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	98.22
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	898.22

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Motor Generators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.20	130
Brian Saxe	P	\$350		
Brendan Frey	A	\$350	19.50	6,825
Kate Eisenstein	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				\$6,955

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Motor Generators**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	800
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	48.75
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	26.40
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$875.15

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Ignition Coils**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	1.0	650
Brian Saxe	P	\$350	1.50	525
Brendan Frey	A	\$350	6.70	2,345
Kate Eisenstein	A	\$350	1.0	350
Joshua Lushnat	A	\$350		
TOTALS				\$3,870

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Ignition Coils**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
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	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$400

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Inverters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650		
Brian Saxe	P	\$350		
Brendan Frey	A	\$350	16.80	5,880
David Hansma	A	\$350	1	350
Joshua Lushnat	A	\$350	.2	70
TOTALS				\$6,300

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Inverters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	23
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$423.00

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	8.20	5,330.00
Brendan Frey	A	\$350	142.55	49,892.50
David Hansma	A	\$350	28.25	9,887.50
Joshua Lushnat	A	\$350	40.60	14,210.00
TOTALS				\$79,320

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Instrument Panel Clusters
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	400.00
Court Fees	
Delivery Services/Messengers	35.00
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	16.37
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	64.56
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$515.93

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Occupant Safety Restraint Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	16.40	10,660
Brendan Frey	A	\$350	60.90	21,315
David Hansma	A	\$350	2.30	805
Joshua Lushnat	A	\$350	.8	280
TOTALS				\$33,060

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Occupant Safety Restraint Systems**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	400
Delivery Services/Messengers	38
Deposition / Court Transcripts	160.05
Experts	
In-House Postage Expense	84.74
Litigation Support Vendors	
Local Counsel	
Travel	18
Long Distance Telephone Expense	
Meals	
Online Research	8.95
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$709.74

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Radiators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.3	135
Brian Saxe	P	\$350		
Brendan Frey	A	\$350	9.4	3,290
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				\$3,425

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Radiators
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	350
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	65.48
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	16.30
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$431.78

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Starters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.3	195
Brendan Frey	A	\$350	2.8	980
Kate Eisenstein	A	\$350	1.0	350
Joshua Lushnat	A	\$350		
TOTALS				\$1,525

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Starters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	350
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	1.10
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$351.10

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Steering Angle Sensors**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.10	65
Brendan Frey	A	\$350	1.20	420
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				\$485

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Steering Angle Sensors** Reporting Period: **Inception to**
September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	800
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	32.74
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$832.74

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Switches**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.60	390
Brendan Frey	A	\$350	5.3	1,855
David Hansma	A	\$350		
Joshua Lushnat	A	\$350		
TOTALS				\$2,245

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Switches**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	800
Delivery Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	49.11
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	7.11
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$856.22

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Valve Timing Control Devices**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	.10	65
Brian Saxe	P	\$350		
Brendan Frey	A	\$350	4.8	1,680
David Hansma	A	\$350	1.0	350
Joshua Lushnat	A	\$350	.30	105
TOTALS				\$2,200

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Mantese Honigman, PC
Case: Valve Timing Control Devices
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	
Court Fees	800
Delivery Services/Messengers	70
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	62.09
Litigation Support Vendors	
Local Counsel	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	13.60
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	

Disbursement	Total Amount To Date
Trial Transcripts	
Witness Fees	
TOTAL	\$945.69

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

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Wire Harness**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	\$650	181.9	\$ 118,235
Theresamarie Mantese	P	\$425	7	\$ 2,975
Brian Saxe	P	\$350	.7	\$ 245
Alex Blum	A	\$350	84.5	\$ 29,575
Brendan Frey	A	\$350	354.5	\$ 124,075
David Hansma	A	\$350	47.8	\$ 16,730
Joshua Lushnat	A	\$350	50.9	\$ 17,815
Kate Eisenstein	A	\$350	73.6	\$ 25,760
Krista Hosmer	A	\$350	5.2	\$ 1,820
Tishia Browning	A	\$350	43.9	\$ 15,365
Fatima Mansour	A	\$350	4	\$ 1,400
James Buster	LC	\$250	10	\$ 2,500
Jonathan Ajlouny	LC	\$250	34	\$ 8,500
TOTALS				\$364,995

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

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: **Wire Harness**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$700.00
Delivery Services/Messengers	\$710.06
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$214.81
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$219.91
Long Distance Telephone Expense	\$
Meals	\$
Online Research	\$534.77
Other	\$1655.00
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$836.00
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$4,870.55

**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

: Case No. 12-cv-00102

: Case No. 12-cv-00202

: Case No. 12-cv-00302

PRODUCT(S):

: Case No. 12-cv-00602

: Case No. 13-cv-00702

AUTOMOTIVE WIRE HARNESSSES;

: Case No. 13-cv-01002

INSTRUMENT PANEL CLUSTERS;

: Case No. 13-cv-01102

FUEL SENDERS; OCCUPANT

: Case No. 13-cv-01302

SAFETY RESTRAINT SYSTEMS;

: Case No. 13-cv-01402

SWITCHES; STEERING ANGLE

: Case No. 13-cv-01502

SENSORS; HID BALLASTS,

Case No. 13-cv-01602

ALTERNATORS, STARTERS,

Case No. 13-cv-01702

IGNITION COILS, MOTOR

Case No. 13-cv-01802

GENERATORS, INVERTERS, AIR

Case No. 13-cv-02002

FLOW METERS, FUEL INJECTION

Case No. 13-cv-02202

SYSTEMS, VALVE TIMING

Case No. 13-cv-02402

CONTROL DEVICES, ELECTRONIC

Case No. 13-cv-02502

THROTTLE BODIES, RADIATORS,

Case No. 13-cv-02602

and ATF WARMERS

This Document Relates to:

: Hon. Marianne O. Battani

ALL DEALERSHIP ACTIONS

**DECLARATION OF DON BARRETT
CONCERNING TIME AND EXPENSES INCURRED BY BARRETT LAW GROUP, PA**

I, Don Barrett, declare as follows:

1. I am a Partner at the law firm of Barrett Law Group, PA and am currently Interim

Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership

Plaintiffs"). I submit this declaration in support of Interim 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 in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the 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, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 and historic billing rates, from the inception of the cases through September 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim 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 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 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. 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, PA in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of \$232,192.03 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 6,058.90 hours. The total lodestar for my firm for this period using current hourly billing rates is \$2,871,687.25.

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

Executed this the 7th day of October, 2015 in Lexington, MS.


DON BARRETT

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: BARRETT LAW GROUP, P.A.****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Don Barrett	P	1,938.90	*See Exhibit 1 for current and historic rates	\$1,569,982.50
David McMullan	P	112.60	*See Exhibit 1 for current and historic rates	\$48,020.00
Brian Herrington	P	801.4	*See Exhibit 1 for current and historic rates	\$362,157.50
Richard Barrett	P	174.30	*See Exhibit 1 for current and historic rates	\$74,205.00
Katherine Riley	P	152.80	*See Exhibit 1 for current and historic rates	\$65,365.00
Sterling Starns	A	421.30	*See Exhibit 1 for current and historic rates	\$130,717.25
Ben White	A	865.20	*See Exhibit 1 for current and historic rates	\$376,210.00
Cary Littlejohn	A	16.10	*See Exhibit 1 for current and historic rates	\$4,830.00
Brandi Hamilton	PL	21.60	*See Exhibit 1 for current and historic rates	\$4,320.00

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: BARRETT LAW GROUP, PA

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Arbitrators/Mediators	
Court Fees	\$1,308.00
Delivery Services/Messengers	\$2,604.87
Deposition/Court Transcripts	
Experts	\$1,025.00
In-House Postage Expense	\$259.15
Litigation Support Vendors	
Local Counsel	
Travel/Meals	\$167,343.24
Long Distance Telephone Expense	\$893.47
Meals	
Online Research	\$990.44
Other/facsimile charges	\$0.60
Temporary Professionals	\$52,984.16
Document/Database Hosting	
Outside Printing	\$4,142.50
Photocopy Expense	\$640.60
Subpoena Fees	
Trial Transcripts	
Witness Fees	
TOTAL	\$232,192.03

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Air Flow Meters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Richard Barrett	P	\$425	.4	\$170.00
TOTALS			.4	\$170.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Barrett Law Group, PA
Case: Air Flow Meters
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Alternators- Lead Case No.: 2:13-cv-00702**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	800	.6	\$480.00
Don Barrett	P	825	1	\$825.00
TOTALS			1.6	\$1,305.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Alternators**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Fuel Senders**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	4.7	\$3,760.00
Don Barrett	P	\$825	.6	\$ 495.00
TOTALS			5.3	\$4,255.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Fuel Senders**
Reporting Period: **Inception to September 15, 2105**

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	\$35.10
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$35.10

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Auto Parts General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	402	\$321,600.00
Don Barrett	P	\$825	335.7	\$276,952.5
David McMullan	P	\$400	15	\$6,000.00
David McMullan	P	\$425	36.3	\$15,427.50
David McMullan	P	\$475	15.8	\$7,505.00
Brian Herrington	P	\$425	2.3	\$977.50
Brian Herrington	P	\$475	19.8	\$9,405.50
Richard Barrett	P	\$400	11.9	\$4,760.00
Richard Barrett	P	\$425	27.1	\$11,517.50
Richard Barrett	P	\$475	16.5	\$7,837.50
Katherine B. Riley	P	\$425	18.27	\$7,764.75
Sterling Starns	PL	\$250	18.5	\$4,625.00
Sterling Starns	P	\$300	60.50	\$18,150.00
Sterling Starns	P	\$350	149.6	\$52,360.00
Ben White	A	\$425	594.20	\$252,535.00
Ben White	A	\$475	170	\$80,750.00
Cary Littlejohn		\$300	6.6	\$1,980.00
Brandi Hamilton	PL	\$200	14.3	\$2,860.00
Carolyn Mirick	PL	\$100	40.	\$4,000.00

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Carolyn Mirick	PL	\$150	95.2	14,280.00
Nanci Maddux	PL	\$150	896.40	\$134,460.00
Zach Schutz	PL	\$150	245.4	\$36,810.00
Cate Barnes	PL	\$150	20	\$3,000.00
Christy Maddux	PL	\$150	3	\$450.00
Melanie Davis	PL	\$150	72	\$10,800.00
TOTALS			3,286.70	\$1,286,807.75

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**

Firm: **Barrett Law Group, PA**
Case: **Auto Parts General**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$1,308.00
Delivery Services/Messengers	\$2,385.58
Deposition / Court Transcripts	\$
Experts	\$1,025.00
In-House Postage Expense	\$257.75
Litigation Support Vendors	\$
Local Counsel	\$
Travel/ Meals	\$152,165.09
Long Distance Telephone Expense	\$893.47
Meals	\$
Online Research	\$752.64
Other/facsimile charges	\$.60
Temporary Professionals	\$52,984.16
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$640.60
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$212,412.89

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

LODESTAR SUMMARY

Revised

Firm: **Barrett Law Group, PA**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	23.9	\$19,120.00
Don Barrett	P	\$825	3.5	2,887.5
David McMullan	P	\$425	34	\$14,450.00
Brian Herrington	P	\$400	2.7	\$1,080.00
Richard Barrett	P	\$400	.7	\$280.00
Richard Barrett	P	\$425	32.2	13,685.
Katherine B. Riley	P	\$425	99.1	\$42,117.50
Sterling Starns	PL	\$250	45.50	\$11,375.00
Sterling Starns	P	\$300	8.50	2,550.00
Ben White	A	\$425	87	\$36,975.00
Rob McGill	OC	\$425	17	\$7,225.00
TOTALS			354.1	\$151,745.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Ignition Coils**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	38.50	\$30,800.00
Richard Barrett	P	\$425	1.5	637.50
TOTALS			40	\$31,437.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Ignition Coils**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Generators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	1.3	\$1,040.00
Don Barrett	P	\$825	1.4	1,155.00
TOTALS			2.7	\$2,195.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Generators**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Inverters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	1.2	\$960.00
Don Barrett	P	\$825	1.7	\$1,402.50
Richard Barrett	P	\$425	1.2	\$510.00
Sterling Starns	PL	\$250	2.5	\$625.00
TOTALS			6.6	\$3,497.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Inverters**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$

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

LODESTAR SUMMARY

Revised

Firm: **Barrett Law Group, PA**
Case: **Occupant Safety Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	20.40	\$16,320.00
Don Barrett	P	\$825	6.8	\$5,610.00
Richard Barrett	P	\$400	1.1	\$440.00
Richard Barrett	P	\$425	24.5	\$10,412.5
TOTALS			52.8	\$32,782.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Occupant Safety Systems**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: Barrett Law Group, PA
Case: Starters
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$825	23.3	\$19,222.50
TOTALS			23.3	\$19,222.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Starters**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Steering Angle Sensors**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	.4	\$320.00
Richard Barrett	P	\$425	1.7	\$722.50
Sterling Starns	PL	\$250	6.6	\$1,650.00
TOTALS			8.7	\$2,692.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Steering Angle Sensors**
Reporting Period: **Inception to September 15, 2105**

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Switches**
Reporting Period: **Inception -- September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	.4	\$320.00
Don Barrett	P	\$825	.6	\$495.00
Richard Barrett	P	\$425	.7	297.50
TOTALS			1.70	\$1,112.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Barrett Law Group, PA
Case: Switches
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$ No Expenses

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

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Wire Harness**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	\$800	691	\$552,800.00
Don Barrett	P	\$825	380.5	313,912.00
David McMullan	P	\$400	10	\$4,000.00
David McMullan	P	\$425	1.5	637.5
Brian Herrington	P	\$400	162.8	\$65,120.00
Brian Herrington	P	\$425	119.6	\$50,830.00
Brian Herrington	P	\$475	494.2	\$234,745.00
Richard Barrett	P	\$400	21.20	\$8,480.00
Richard Barrett	P	\$425	13.60	5,780.00
Richard Barrett	P	\$475	20	9,500.00
Katherine B. Riley	P	\$425	26.5	\$11,262.5
Katherine B. Riley	P	\$475	8.5	\$4,037.50
Sterling Starns	PL	\$250	42.9	\$10,725.00
Sterling Starns	P	\$300	53	15,900.00
Sterling Starns	P	\$350	33.20	11,620.00
Ben White	A	\$425	14	\$5,950.00
Cary Littlejohn		\$300	9.5	\$2,850.00
Brandi Hamilton	LC	\$200	7.3	\$1,460.00
Nanci Maddux	PL	\$150	139.7	\$20,955.00

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Cate Barnes	PL	\$150	26	\$3,900.00
TOTALS			2,275	\$1,334,464.50

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**

Firm: **Barrett Law Group, PA**
Case: **Wire Harness**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$219.29
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$1.40
Litigation Support Vendors	\$
Local Counsel	\$
Travel/Meals	\$15,178.15
Long Distance Telephone Expense	\$
Meals	\$
Online Research	\$202.70
Other	\$
Temporary Professionals(Scanning docs)	\$4,142.50
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$

Disbursement	Total Amount To Date
TOTAL	\$19,744.04

**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

: Case No. 12-cv-00102

Case No. 12-cv-00202

: Case No. 12-cv-00302

PRODUCT(S):

: Case No. 12-cv-00602

: Case No. 13-cv-00702

AUTOMOTIVE WIRE HARNESES;

: Case No. 13-cv-01002

INSTRUMENT PANEL CLUSTERS;

: Case No. 13-cv-01102

FUEL SENDERS; OCCUPANT

: Case No. 13-cv-01302

SAFETY RESTRAINT SYSTEMS;

: Case No. 13-cv-01402

SWITCHES; STEERING ANGLE

: Case No. 13-cv-01502

SENSORS; HID BALLASTS,

Case No. 13-cv-01602

ALTERNATORS, STARTERS,

Case No. 13-cv-01702

IGNITION COILS, MOTOR

Case No. 13-cv-01802

GENERATORS, INVERTERS, AIR

Case No. 13-cv-02002

FLOW METERS, FUEL INJECTION

Case No. 13-cv-02202

SYSTEMS, VALVE TIMING

Case No. 13-cv-02402

CONTROL DEVICES, ELECTRONIC

Case No. 13-cv-02502

THROTTLE BODIES, RADIATORS,
and ATF WARMERS

Case No. 13-cv-02602

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, in the cases listed above in this Autoparts Antitrust Litigation ("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:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for 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 does

not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. 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.

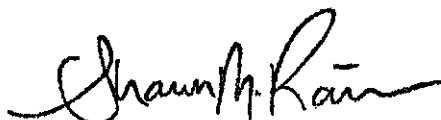
5. My firm has expended a total of \$115,811.08 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

6. 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.

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 7,091.7 hours. The total lodestar for my firm for this period using current hourly billing rates is \$2,807,681.50.

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

Executed this the 8th day of October, 2015 in St. Paul, Minnesota.



SHAWN M. RAITER

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: LARSON KING, LLP****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Shawn M. Raiter	P	1,867.60	\$705.00	\$1,316,658.00
T. Joseph Snodgrass	P	29.4	\$705.00	\$20,727.00
Kelly A. Lelo	P	281.1	\$425.00	\$119,467.50
Melissa M. Mulloy	P	52.10	\$425.00	\$22,142.50
Paul A. Sand	A	1371.6	\$325.00	\$445,770.00
Paul M. Shapiro	A	307.6	\$325.00	\$99,970.00
Cassandra F. Fortin	A	37.80	\$325.00	\$12,285.00
Rence L Fossen	A	747.60	\$325.00	\$242,970.00
Hilary J. Palazzolo	A	179.6	\$325.00	\$58,370.00
Jennifer L. Young	A	116.9	\$325.00	\$37,992.50
David P. McKinney	A	41.00	\$325.00	\$13,325.00
Andrew M. Hart	A	500.5	\$325.00	\$162,662.50
Stephanie L. Chandler	A	29.90	\$325.00	\$9,717.50
Gretchen A. Touchette	PL	581.60	\$180.00	\$104,688.00
Diane M. Schreifels	PL	140.4	\$180.00	\$25,272.00
Louise Bautch-Holton	PL	6.6	\$175.00	\$1,155.00
Anne Rodriguez	PL	134.00	\$150.00	\$20,100.00
Bjorn Hedstrom	PL	131.5	\$150.00	\$19,725.00

John Sievers	PL	285.4	\$150.00	\$42,810.00
Ian D. Wright	PL	211.3	\$140.00	\$29,582.00
Laurie C. Burks	LAA	38.2	\$60.00	\$2,292.00
TOTALS		7,091.70		\$2,807,681.50

P = Partner

C = Counsel

A = Associate

PL = Paralegal

LAA = Legal Administrative Assistant

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: LARSON KING, LLP

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$9,121.14
Postage Charges	\$163.52
Facsimile Charges	0
Long Distance	\$1,544.29
In-House Photocopying	\$1,227.40
Outside Photocopying	\$4,791.50
Travel (Transportation, lodging, meals, etc.)	\$67,736.81
Court Fees (filing, etc.)	\$612.00
Professional Fees (expert/investigators, etc.)	0
Witness/Service Fees	\$751.74
Court Reporter/Transcripts	\$114.85
Computer Research	\$26,567.74
Miscellaneous (Describe)(external hard drives/flash drives for document productions in WH)	\$3,180.09
TOTAL	\$115,811.08

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Air Flow Meters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Air Flow Meters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paul A. Sand	A	\$325.00	10.70	\$3,477.50
Louise Bautch-Holton	PL	\$175.00	.60	\$105.00
TOTALS				\$3,582.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Alternators**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other Litigation Fund Assessments	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00

Disbursement	Total Amount To Date
Subpoena Fees	\$0.00
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Automatic Transmission Fluid Warmers**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Andrew M. Hart	A	\$325.00	2.80	\$910.00
TOTALS				\$910.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Automatic Transmission Fluid Warmers**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Fuel Injection Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Fuel Injection Systems**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Fuel Senders**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	3.80	\$2,679.00
Paul A. Sand	A	\$325.00	53.70	\$17,452.50
Louise Bautch-Holton	PL	\$175.00	.70	\$122.50
TOTALS				\$20,254.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Fuel Senders**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$841.60
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$21.50

Disbursement	Total Amount To Date
Subpoena Fees	\$0.00
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 863.10

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **General Matters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	387.00	\$272,835.00
T. Joseph Snodgrass	P	\$705.00	1.00	\$705.00
Kelly A. Lelo	P	\$425.00	1.00	\$425.00
Paul A. Sand	A	\$325.00	213.80	\$69,485.00
Paul M. Shapiro	A	\$325.00	44.10	\$14,332.50
Louise Bautch-Holton	PL	\$175.00	1.10	\$192.50
TOTALS			648.00	\$357,975.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **General Matters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$47.47
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.48
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$20,016.66
Long Distance Telephone Expense	\$22.42
Meals	\$2,291.57
Online Research	\$459.70
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$84.30
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$22,922.60

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **HID Ballasts**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **HID Ballasts**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Ignition Coils**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	.60	\$423.00
TOTALS				\$423.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Ignition Coils**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	30.80	\$21,714.00
T. Joseph Snodgrass	P	\$705.00	.80	\$564.00
Kelly A. Lelo	P	\$425.00	154.80	\$65,790.00
Paul A. Sand	A	\$325.00	256.80	\$83,460.00
Paul M. Shapiro	A	\$325.00	263.50	\$85,637.50
Louise Bautch-Holton	PL	\$175.00	1.00	\$175.00
TOTALS				\$257,340.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$17.02
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$441.17
Long Distance Telephone Expense	\$19.65
Meals	\$159.02
Online Research	\$3,275.92
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$49.40

Disbursement	Total Amount To Date
Subpoena Fees	\$0.00
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$3,962.18

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Inverters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Inverters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Motor Generators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Motor Generators**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Occupant Safety Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	77.70	\$54,778.50
Paul A. Sand	A	\$325.00	34.30	\$11,147.50
Andrew M. Hart	A	\$325.00	7.20	\$2,340.00
Louise Bautch-Holton	PL	\$175.00	.60	\$105.00
TOTALS				\$68,371.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Occupant Safety Systems**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$1,770.65
Long Distance Telephone Expense	\$0.00
Meals	\$20.51
Online Research	\$672.30
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$13.90
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$2,477.36

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Radiators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paul A. Sand	A	\$325.00	.70	\$227.50
Andrew M. Hart	A	\$325.00	5.3	\$1,722.50
Louise Bautch-Holton	PL	\$175.00	.60	\$105.00
TOTALS				\$2,055.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Radiators**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Starters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paul A. Sand	A	\$325.00	4.40	\$1,430.00
Louise Bautch-Holton	PL	\$175.00	.60	\$105.00
TOTALS				\$1,535.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Starters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Steering Angle Sensors**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Steering Angle Sensors**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Switches**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
N/A				\$0.00
TOTALS				\$0.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Switches**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Valve Timing Control Devices**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	.50	\$352.50
TOTALS				\$352.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Valve Timing Control Devices**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$0.00
Delivery Services/Messengers	\$0.00
Deposition / Court Transcripts	\$0.00
Experts	\$0.00
In-House Postage Expense	\$0.00
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$0.00
Long Distance Telephone Expense	\$0.00
Meals	\$0.00
Online Research	\$0.00
Other	\$0.00
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$0.00
Photocopy Expense	\$0.00
Subpoena Fees	\$0.00

Disbursement	Total Amount To Date
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$ 0.00

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

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Wire Harness**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$705.00	1367.20	\$963,876.00
T. Joseph Snodgrass	P	\$705.00	27.60	\$19,458.00
Kelly A. Lelo	P	\$425.00	125.30	\$53,252.50
Melissa M. Mulloy	P	\$425.00	52.10	\$22,142.50
Paul A. Sand	A	\$325.00	797.20	\$259,090.00
Cassandra F. Fortin	A	\$325.00	37.80	\$12,285.00
Renee I. Fossen	A	\$325.00	747.60	\$242,970.00
Hilary J. Palazzolo	A	\$325.00	179.60	\$58,370.00
Jennifer L. Young	A	\$325.00	116.90	\$37,992.50
David P. McKinney	A	\$325.00	41.00	\$13,325.00
Andrew M. Hart	A	\$325.00	485.20	\$157,690.00
Stephanie L. Chandler	A	\$325.00	29.90	\$9,717.50
Gretchen A. Touchette	PL	\$180.00	581.60	\$104,688.00
Diane M. Schreifels	PL	\$180.00	140.40	\$25,272.00
Louise Bautch-Holton	PL	\$175.00	1.40	\$245.00
Anne Rodriguez	PL	\$150.00	134.00	\$20,100.00

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Bjorn Hedstrom	PL	\$150.00	131.50	\$19,725.00
John Sievers	PL	\$150.00	285.40	\$42,810.00
Ian D. Wright	PL	\$140.00	211.30	\$29,582.00
Laurie C. Burks	LAA	\$60.00	38.20	\$2,292.00
TOTALS			5,531.20	\$2,094,883.00

Partner (P)
 Associate (A)
 Paralegal (PL)
 Of Counsel (OC)
 Law Clerk (LC)
 Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: **Wire Harness**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0.00
Court Fees	\$612.00
Delivery Services/Messengers	\$9,056.65
Deposition / Court Transcripts	\$114.85
Experts	\$0.00
In-House Postage Expense	\$163.04
Litigation Support Vendors	\$0.00
Local Counsel	\$0.00
Travel	\$41,611.85
Long Distance Telephone Expense	\$1,502.22
Meals	\$1,425.38
Online Research	\$21,318.22
Other External hard drives / flash drives for document productions	\$3,180.09
Temporary Professionals	\$0.00
Document / Database Hosting	\$0.00
Outside Printing	\$4,791.50
Photocopy Expense	\$1,058.30

Disbursement	Total Amount To Date
Subpoena Fees	\$751.74
Trial Transcripts	\$0.00
Witness Fees	\$0.00
TOTAL	\$85,585.84

**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
	:	
	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
PRODUCT(S):	:	Case No. 12-cv-00602
	:	Case No. 13-cv-00702
AUTOMOTIVE WIRE HARNESSES;	:	Case No. 13-cv-01002
INSTRUMENT PANEL CLUSTERS;	:	Case No. 13-cv-01102
FUEL SENDERS; OCCUPANT	:	Case No. 13-cv-01302
SAFETY RESTRAINT SYSTEMS;	:	Case No. 13-cv-01402
SWITCHES; STEERING ANGLE	:	Case No. 13-cv-01502
SENSORS; HID BALLASTS,	:	Case No. 13-cv-01602
ALTERNATORS, STARTERS,	:	Case No. 13-cv-01702
IGNITION COILS, MOTOR	:	Case No. 13-cv-01802
GENERATORS, INVERTERS, AIR	:	Case No. 13-cv-02002
FLOW METERS, FUEL INJECTION	:	Case No. 13-cv-02202
SYSTEMS, VALVE TIMING	:	Case No. 13-cv-02402
CONTROL DEVICES, ELECTRONIC	:	Case No. 13-cv-02502
THROTTLE BODIES, RADIATORS,	:	Case No. 13-cv-02602
and ATF WARMERS		
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 Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs"). I submit this declaration in support of Interim 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 in this Autoparts Antitrust Litigation ("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, in consultation with the other Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 15, 2015. The summary was prepared at my request from contemporaneous, records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim 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 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 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 is 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.

5. My firm has expended a total of \$252,242.90 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 26,126.03 hours. The total lodestar for my firm for this period using current hourly billing rates is \$16,156,576.42.

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

Executed this the 14th day of October, 2015 in Washington, DC.

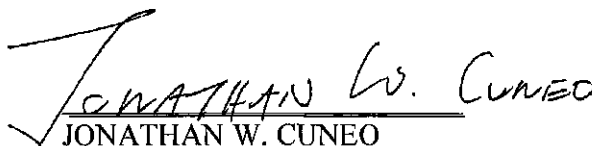

JONATHAN W. CUNEO

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: CUNEO, GILBERT AND LADUCA, LLP****Reporting Period: Inception– September 15, 2015**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	\$895	3,407.45	\$3,049,667.75
Pamela Gilbert	P	\$575	19.45	\$11,183.75
Charles LaDuca	P	\$695	16.95	\$11,780.25
Joel Davidow	P	\$895	1,956.25	\$1,750,843.75
Charles Tiefer	OC	\$800	187.50	\$150,000.00
Robert Cynkar	P	\$775	7.95	\$6,161.25
Michael Flannery	P	\$775	246.50	\$191,037.50
Matthew E. Miller	P	\$775	191.40	\$148,335.00
David W. Stanley	P	\$750	1.75	\$1,312.50
Sandra Cuneo	P	\$725	256.00	\$185,600.00
Matthew Wiener	P	\$700	1.70	\$1,190.00
Daniel Cohen	P	\$695	1,562.82	\$1,086,157.58
Alexandra Warren	P	\$650	7.70	\$5,005.00
William Anderson	P	\$650	12.00	\$7,800.00
Preetpal Grewal	-	\$575	18.95	\$10,896.25
Katie Van Dyck	P	\$650	308.80	\$200,720.00
Taylor Asen	A	\$500	192.00	\$96,000.00
Evelyn Li	A	\$500	3,450.75	\$1,725,375.00
Jennifer Kelly	A	\$575	736.90	\$423,717.50
Victoria Romanenko	A	\$575	11,520.91	\$6,624,527.09
Brendan Thompson	A	\$575	7.75	\$4,456.25
Julie Sorenson	A	\$500	5.00	\$2,500.00
Beatrice Yakubu	A	\$500	190.25	\$95,125.00
Benjamin Elga	A	\$425	126.50	\$53,762.50
Anthony Carter	A	\$375	17.25	\$6,468.75
Daniel Black	PL	\$200	187.15	\$37,430.00
Laura Cheek	PL	\$200	3.75	\$750.00

Ben Elga	PL	\$200	5.00	\$1,000.00
Dasha Gorlov	PL	\$200	8.35	\$1,670.00
Molly Green	PL	\$200	0.25	\$50.00
Daniel Howick	PL	\$200	9.70	\$1,940.00
Tess Illos	PL	\$200	11.35	\$2,270.00
Vasiliki Katsarou	PL	\$200	44.50	\$8,900.00
Kyle Lambrecht	PL	\$200	129.00	\$25,800.00
Matthew Laps	PL	\$200	21.50	\$4,300.00
Claire Peters	PL	\$200	48.50	\$9,700.00
Annie Reiner	PL	\$200	58.35	\$11,670.00
Gabe Stutman	PL	\$200	21.90	\$4,380.00
Nadia Belkin	PL	\$175	336.00	\$58,800.00
Ava Mehta	PL	\$175	79.75	\$13,956.25
Alexandra Peck	PL	\$175	54.00	\$9,450.00
Tim Powell	PL	\$175	84.25	\$14,743.75
Marie Schenk	PL	\$175	571.75	\$100,056.25
Annie Zanolini	PL	\$175	0.50	\$87.50
TOTALS			26,126.03	\$16,156,576.42

P = Partner

OC = Of Counsel

A = Associate

PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: CUNEO, GILBERT AND LADUCA, LLP

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$1,289.47
Postage Charges	\$431.58
Facsimile Charges	0
Long Distance	\$2,420.39
In-House Photocopying	\$17.00
Outside Photocopying	\$3,453.69
Travel (Transportation, lodging, meals, etc.)	\$182,859.95
Court Fees (filing, etc.)	\$1,247.82
Professional Fees (expert/investigators, etc.)	\$1,482.53
Witness/Service Fees	0
Court Reporter/Transcripts	\$1,051.20
Computer Research	\$24,768.85
Miscellaneous (Describe) Express Mail	\$7,459.92
Miscellaneous (Describe) Place Holding	\$130.50
Miscellaneous (Describe) Press Release	\$1,235.00
Miscellaneous (Describe) Translation	\$24,395.00
TOTAL	\$252,242.90

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Air Flow Meters
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Victoria Romanenko	A	\$575	18.50	\$10,637.50
TOTALS			18.50	\$10,637.50

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: **Air Flow Meters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Federal Express	
Other: Translation	
TOTAL	

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

LODESTAR SUMMARY

Firm: **Cuneo Gilbert & LaDuca**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	76.25	\$68,243.75
Joel Davidow	P	\$895	3.50	\$3,132.50
Victoria Romanenko	A	\$575	56.63	\$32,564.17
Evelyn Li	A	\$500	6.75	\$3,375.00
Ben Elga	A	\$425	0.50	\$212.50
Dan Black	PL	\$200	1.00	\$200.00
TOTALS			144.63	\$107,727.92

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: **Alternators**
Reporting Period: **Inception to September 15, 2105**

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	\$532.74
Long Distance Telephone Expense	
Meals	\$152.43
Online Research	
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	
Trial Transcripts	
Witness Fees	
TOTAL	\$685.17

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

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Auto Parts General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan W. Cuneo	P	\$895	1,562.00	\$1,397,990.00
Pamela Gilbert	P	\$575	13.75	\$7,906.25
Charles LaDuca	P	\$695	8.50	\$5,907.50
Joel Davidow	P	\$895	700.55	\$626,992.25
Charles Tiefer	OC	\$800	187.50	\$150,000.00
Robert Cynkar	P	\$775	2.75	\$2,131.25
Michael Flannery	P	\$775	31.15	\$24,141.25
Matthew E. Miller	P	\$775	172.75	\$133,881.25
David W. Stanley	P	\$750	1.50	\$1,125.00
Sandra Cuneo	P	\$725	27.50	\$19,937.50
Matthew Wiener	P	\$700	0.25	\$175.00
Daniel Cohen	P	\$695	1,401.75	\$974,216.25
Alexandra Warren	A	\$650	2.50	\$1,625.00
William Anderson	P	\$650	2.25	\$1,462.50
Preetpal Grewal	-	\$575	2.00	\$1,150.00
Katie Van Dyck	A	\$650	101.70	\$66,105.00
Taylor Asen	A	\$500	192.00	\$96,000.00
Evelyn Li	A	\$500	822.50	\$411,250.00
Jennifer Kelly	A	\$575	350.85	\$201,738.75
Victoria Romanenko	A	\$575	3,682.500	\$2,117,437.50
Brendan Thompson	A	\$575	3.50	\$2,012.50
Julie Sorenson	A	500	5.00	\$2,500.00
Beatrice Yakubu	A	\$500	37.50	\$18,750.00
Benjamin Elga	A	\$425	77.25	\$32,831.25
Anthony Carter	A	\$375	17.25	\$6,468.75
Daniel Black	PL	\$200	93.00	\$18,600.00
Laura Cheek	PL	\$200	1.00	\$200.00

Professional	Status	Hourly Rate	Total Hours to Date	Total Lodestar to Date
Dasha Gorlov	PL	\$200	2.00	\$400.00
Daniel Howick	PL	\$200	3.75	\$750.00
Tess Illos	PL	\$200	10.00	\$2,000.00
Vasiliki Katsarou	PL	\$200	0.50	\$100.00
Kyle Lambrecht	PL	\$200	128.00	\$25,600.00
Matthew Laps	PL	\$200	12.50	\$2,500.00
Claire Peters	PL	\$200	21.75	\$4,350.00
Annie Reiner	PL	\$200	33.50	\$6,700.00
Gabe Stutman	PL	\$200	6.75	\$1,350.00
Nadia Belkin	PL	\$175	294.25	\$51,493.75
Ava Mehta	PL	\$175	29.25	\$5,118.75
Alexandra Peck	PL	\$175	54.00	\$9,450.00
Tim Powell	PL	\$175	56.50	\$9,887.50
Marie Schenk	PL	\$175	419.50	\$73,412.50
Annie Zanolini	PL	\$175	0.50	\$87.50
TOTALS			10,573.50	\$6,515,734.75

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Auto Parts General
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	\$731.00
Delivery Services/Messengers	\$295.42
Deposition / Court Transcripts	\$1,023.90
Experts	\$1,100.00
In-House Postage Expense	\$376.27
Travel	\$100,932.69
Long Distance Telephone Expense	\$1,699.83
Meals	\$20,573.83
Online Research	\$9,968.29
Other: Express Mail	\$3,688.41
Other: Place Holding	\$130.50
Outside Printing	\$2,684.43
Photocopy Expense	\$13.75
TOTAL	\$143,218.32

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **ATF Warmer Component**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
			0	0
TOTALS			0	0

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: ATF Warmer Component
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Express Mail	
Other: Translation	
TOTAL	\$0.00

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

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Victoria Romanenko	A	\$575	5.75	\$3,306.25
TOTALS			5.75	\$3,306.25

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Federal Express	
Other: Translation	
TOTAL	

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Fuel Injection System
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	895	2.75	\$2,461.25
Victoria Romanenko	A	\$575	67.75	\$38,956.25
Evelyn Li	A	\$500	46.00	\$23,000.00
TOTALS			116.50	\$64,417.50

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Fuel Injection System
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	\$38.37
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Express Mail	
Other: Translation	
TOTAL	\$38.37

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Fuel Senders
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan W. Cuneo	P	\$895	70.05	\$62,694.75
Pamela Gilbert	P	\$575	0.35	\$201.25
Charles LaDuca	P	\$695	0.35	\$243.25
Joel Davidow	P	\$895	14.65	\$13,111.75
Robert Cynkar	P	\$775	0.35	\$271.25
Michael Flannery	P	\$775	4.50	\$3,487.50
Matthew E. Miller	P	\$775	1.20	\$930.00
Matthew Wiener	P	\$700	0.10	\$70.00
Daniel Cohen	P	\$695	22.65	\$15,741.75
Alexandra Warren	A	\$650	0.10	\$65.00
Katie Van Dyck	A	\$650	8.25	\$5,362.50
Jennifer Kelly	A	\$575	15.10	\$8,682.50
Victoria Romanenko	A	\$575	491.25	\$282,468.75
Brendan Thompson	A	\$575	0.25	\$143.75
Evelyn Li	A	\$500	141.25	\$70,625.00
Beatrice Yakubu	A	\$500	0.25	\$125.00
Benjamin Elga	A	\$425	0.75	\$318.75
Daniel Black	PL	\$200	1.20	\$240.00
Laura Cheek	PL	\$200	0.25	\$50.00
Benjamin Elga	PL	\$200	0.25	\$50.00
Dasha Gorlov	PL	\$200	0.35	\$70.00
Daniel Howick	PL	\$200	0.10	\$20.00
Tess Illos	PL	\$200	0.55	\$110.00
Kyle Lambrecht	PL	\$200	0.25	\$50.00
Claire Peters	PL	\$200	0.25	\$50.00
Annie Reiner	PL	\$200	3.60	\$720.00
Gabe Stutman	PL	\$200	5.20	\$1,040.00
Tim Powell	PL	\$175	1.50	\$262.50
Marie Schenk	PL	\$175	21.00	\$3,675.00
TOTALS			805.90	\$470,880.25

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: **Fuel Senders**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Court Fees	\$191.99
Deliver Services/Messengers	\$275.00
Deposition / Court Transcripts	\$13.65
Experts	\$166.67
In-House Postage Expense	\$2.26
Travel	\$5,220.35
Long Distance Telephone Expense	\$12.26
Meals	\$491.05
Online Research	\$1,892.07
Other: Express Mail	\$362.14
Other: Translation	\$1,685.00
TOTAL	\$10,312.44

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

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **HID Ballasts**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Joel Davidow	P	\$895	16.00	\$14,320.00
Victoria Romanenko	A	\$575	14.50	\$8,337.50
Evelyn Li	A	\$500	2.50	\$1,250.00
Nadia Belkin	PL	\$175	19.00	\$3,325.00
TOTALS			52.00	\$27,232.50

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: **HID Ballasts**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Federal Express	
Other: Translation	
TOTAL	

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Ignition Coils
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	7.50	\$6,712.50
Joel Davidow	P	\$895	3.50	\$3,132.50
Daniel Cohen	P	\$695	2.50	\$1,737.50
Katie Van Dyck	A	\$650	3.25	\$2,112.50
Victoria Romanenko	A	\$575	38.50	\$22,137.50
Evelyn Li	A	\$500	27.50	\$13,750.00
Marie Schenk	PL	\$175	0.50	\$87.50
TOTALS			83.25	\$49,670.00

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Ignition Coils
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	\$469.29
Long Distance Telephone Expense	
Meals	\$32.16
Online Research	
Other: Federal Express	
Other: Translation	
TOTAL	\$501.45

In Re: Auto Parts Antitrust Litigation**MDL 2311****LODESTAR SUMMARY**Firm: **Cuneo, Gilbert & LaDuca, LLP**Case: **Inverters**Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Victoria Romanenko	A	\$575	57.25	\$32,918.75
Evelyn Li	A	\$500	21.75	\$10,875.00
TOTALS			79.00	\$43,793.75

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Inverters
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	\$11.63
Long Distance Telephone Expense	
Meals	\$8.38
Online Research	
Other: Express Mail	
Other: Translation	
TOTAL	\$20.01

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Instrument Panel Clusters
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan W. Cuneo	P	\$895	222.80	\$199,406.00
Pamela Gilbert	P	\$575	0.60	\$345.00
Charles LaDuca	P	\$695	0.60	\$417.00
Joel Davidow	P	\$895	110.65	\$99,031.75
Robert Cynkar	P	\$775	0.60	\$465.00
Michael Flannery	P	\$775	5.20	\$4,030.00
Matthew E. Miller	P	\$775	1.45	\$1,123.75
Sandra Cuneo	P	\$725	76.25	\$55,281.25
Matthew Wiener	P	\$700	0.10	\$70.00
Daniel Cohen	P	\$695	22.92	\$15,927.08
Alexandra Warren	A	\$650	0.35	\$227.50
William Anderson	P	\$650	0.25	\$162.50
Katie Van Dyck	A	\$650	89.75	\$58,337.50
Jennifer Kelly	A	\$575	112.35	\$64,601.25
Victoria Romanenko	A	\$575	1,070.70	\$615,652.50
Brendan Thompson	A	\$575	0.50	\$287.50
Evelyn Li	A	\$500	175.75	\$87,875.00
Beatrice Yakubu	A	\$500	129.00	\$64,500.00
Daniel Black	PL	\$200	46.70	\$9,340.00
Laura Cheek	PL	\$200	0.25	\$50.00
Benjamin Elga	PL	\$200	0.25	\$50.00
Dasha Gorlov	PL	\$200	0.50	\$100.00
Daniel Howick	PL	\$200	2.60	\$520.00
Tess Illos	PL	\$200	0.55	\$110.00
Kyle Lambrecht	PL	\$200	0.25	\$50.00
Matthew Laps	PL	\$200	3.25	\$650.00
Claire Peters	PL	\$200	0.25	\$50.00
Annie Reiner	PL	\$200	3.00	\$600.00
Gabe Stutman	PL	\$200	4.70	\$940.00
Marie Schenk	PL	\$175	9.50	\$1,662.50
TOTALS			2,091.62	\$1,281,863.08

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Instrument Panel Clusters
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	192.01
Deliver Services/Messengers	\$325.00
Deposition / Court Transcripts	\$13.65
Experts	\$215.86
In-House Postage Expense	\$2.27
Travel	\$10,808.06
Long Distance Telephone Expense	\$68.85
Meals	\$1,547.44
Online Research	\$3,008.61
Other: Express Mail	287.80
Other: Translation	\$11,485.00
TOTAL	\$27,954.55

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Motor Generators
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	0.50	\$447.50
Victoria Romanenko	A	\$575	42.75	\$24,581.25
Evelyn Li	A	\$500	1.50	\$750.00
Marie Schenk	PL	\$175	1.00	\$175.00
TOTALS			45.75	\$25,953.75

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: **Motor Generators**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	\$38.24
Online Research	
Other: Federal Express	\$157.34
Other: Translation	
TOTAL	\$195.58

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

LODESTAR SUMMARY

Firm: **Cuneo Gilbert & LaDuca**
Case: **Occupant Safety Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan W. Cuneo	P	\$895	180.50	\$161,547.50
Pamela Gilbert	P	\$575	0.25	\$143.75
Charles LaDuca	P	\$695	0.25	\$173.75
Joel Davidow	P	\$895	85.20	\$76,254.00
Robert Cynkar	P	\$775	0.25	\$193.75
Michael Flannery	P	\$775	0.80	\$620.00
Matthew E. Miller	P	\$775	0.25	\$193.75
Sandra Cuneo	P	\$725	0.25	\$181.25
Alexandra Warren	A	\$650	0.25	\$162.50
William Anderson	P	\$650	0.25	\$162.50
Katie Van Dyck	A	\$650	12.00	\$7,800.00
Victoria Romanenko	A	\$575	427.25	\$245,668.75
Evelyn Li	A	\$500	194.50	\$97,250.00
Benjamin Elga	A	\$425	8.50	\$3,612.50
Daniel Black	PL	\$200	8.5	\$1,700.00
Matthew Laps	PL	\$200	4.75	\$950.00
Marie Schenk	PL	\$175	4.00	\$700.00
TOTALS			927.75	\$597,314.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: **Occupant Safety Systems**
Reporting Period: **Inception to September 15, 2105**

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	\$4,586.88
Long Distance Telephone Expense	
Meals	\$948.38
Online Research	\$745.00
Other: Express Mail	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	
Trial Transcripts	
Witness Fees	
TOTAL	\$6,280.26

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Radiators
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	49.35	\$44,168.25
Joel Davidow	P	\$895	1.00	\$895.00
Katie Van Dyck	A	\$650	13.25	\$8,612.50
Victoria Romanenko	A	\$575	18.38	\$10,570.42
Evelyn Li	A	\$500	4.00	\$2,000.00
Nadia Belkin	PL	\$175	0.25	\$43.75
Marie Schenk	PL	\$175	0.25	\$43.75
TOTALS			86.48	\$66,333.67

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Radiators
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	\$16.35
Long Distance Telephone Expense	
Meals	
Online Research	\$14.00
Other: Federal Express	
Other: Translation	
TOTAL	\$30.35

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo Gilbert & LaDuca
Case: Starters/Generators
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	62.25	\$55,713.75
Joel Davidow	P	\$895	1.50	\$1,342.50
Victoria Romanenko	A	\$575	52.25	\$30,043.75
Evelyn Li	A	\$500	6.00	\$3,000.00
Dan Black	PL	\$200	1.00	200.00
Tim Powell	PL	\$175	2.50	\$437.50
Marie Schenk	PL	\$175	1.50	\$262.50
TOTALS			127.00	\$91,000.00

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: **Starters**
Reporting Period: **Inception to September 15, 2105**

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	\$703.53
Long Distance Telephone Expense	
Meals	\$169.20
Online Research	
Other	
Temporary Professionals	
Document / Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	
Trial Transcripts	
Witness Fees	
TOTAL	\$872.73

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Steering Angle Sensors
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	41.75	\$37,366.25
Victoria Romanenko	A	\$575	1.25	\$718.75
Evelyn Li	A	\$500	0.50	\$250.00
TOTALS			43.50	\$38,335.00

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: **Steering Angle Sensors**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Federal Express	
Other: Translation	
TOTAL	

In Re: Auto Parts Antitrust Litigation

MDL 2311

LODESTAR SUMMARY

Firm: Cuneo, Gilbert & LaDuca, LLP
Case: Switches
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	2.00	\$1,790.00
Katie Van Dyck	A	\$650	10.50	\$6,825.00
Victoria Romanenko	A	\$575	30.00	\$17,250.00
Evelyn Li	A	\$500	23.50	\$11,750.00
TOTALS			66.00	\$37,615.00

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Switches
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	
Long Distance Telephone Expense	
Meals	
Online Research	
Other: Federal Express	
Other: Translation	
TOTAL	

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

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Valve Timing Controls**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$895	9.00	\$8,055.00
Victoria Romanenko	A	\$575	46.25	\$26,593.75
Evelyn Li	A	\$500	41.75	\$20,875.00
Benjamin Elga	A	\$425	1.50	\$637.50
TOTALS			98.50	\$56,161.25

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Valve Timing Controls
Reporting Period: Inception to September 15, 2015

Disbursement	Total Amount To Date
Court Fees	
Deliver Services/Messengers	
Deposition / Court Transcripts	
Experts	
In-House Postage Expense	
Travel	\$360.94
Long Distance Telephone Expense	
Meals	\$13.19
Online Research	
Other: Express Mail	
Other: Translation	
TOTAL	\$374.13

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

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Wire Harness**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan W. Cuneo	P	\$895	1,120.75	\$1,003,071.25
Pamela Gilbert	P	\$575	4.50	\$2,587.50
Charles LaDuca	P	\$695	7.25	\$5,038.75
Joel Davidow	P	\$895	1,019.70	\$912,631.50
Robert Cynkar	P	\$775	4.00	\$3,100.00
Michael Flannery	P	\$775	204.85	\$158,758.75
Matthew E. Miller	P	\$775	15.75	\$12,206.25
David W. Stanley	P	\$750	0.25	\$187.50
Sandra Cuneo	P	\$725	152.00	\$110,200.00
Matthew Wiener	P	\$700	1.25	\$875.00
Daniel Cohen	P	\$695	113.00	\$78,535.00
Alexandra Warren	A	\$650	4.50	\$2,925.00
William Anderson	P	\$650	9.25	\$6,012.50
Preetpal Grewal		\$575	16.95	\$9,746.25
Katie Van Dyck	A	\$650	70.10	\$45,565.00
Jennifer Kelly	A	\$575	258.60	\$148,695.00
Victoria Romanenko	A	\$575	5,399.45	\$3,104,683.75
Brendan Thompson	A	\$575	3.50	\$2,012.50
Evelyn Li	A	\$500	1,935.00	\$967,500.00
Beatrice Yakubu	A	\$500	23.50	\$11,750.00
Benjamin Elga	A	\$425	38.00	\$16,150.00
Daniel Black	PL	\$200	35.75	\$7,150.00
Laura Cheek	PL	\$200	2.25	\$450.00
Benjamin Elga	PL	\$200	4.50	\$900.00
Dasha Gorlov	PL	\$200	5.50	\$1,100.00
Molly Green	PL	\$200	0.25	\$50.00

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Cuneo Gilbert & LaDuca, LLP
Case: Wire Harness
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Court Fees	\$132.82
Deposition / Court Transcripts	\$394.05
In-House Postage Expense	\$50.78
Travel	\$33,968.32
Long Distance Telephone Expense	\$639.45
Meals	\$1,236.50
Online Research	\$9,140.88
Other: Express Mail	\$2,964.23
Other: Translation	\$11,225.00
Other: Press Release	\$1,235.00
Outside Printing	\$769.26
Photocopy Expense	\$3.25
TOTAL	\$61,759.54

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

IN RE: AUTOMOTIVE PARTS	:	Master File No. 12-md-02311
ANTITRUST LITIGATION	:	
	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
PRODUCT(S):	:	Case No. 12-cv-00602
	:	Case No. 13-cv-00702
AUTOMOTIVE WIRE HARNESES;	:	Case No. 13-cv-01002
INSTRUMENT PANEL CLUSTERS;	:	Case No. 13-cv-01102
FUEL SENDERS; OCCUPANT	:	Case No. 13-cv-01302
SAFETY RESTRAINT SYSTEMS;	:	Case No. 13-cv-01402
SWITCHES; STEERING ANGLE	:	Case No. 13-cv-01502
SENSORS; HID BALLASTS,	:	Case No. 13-cv-01602
ALTERNATORS, STARTERS,	:	Case No. 13-cv-01702
IGNITION COILS, MOTOR	:	Case No. 13-cv-01802
GENERATORS, INVERTERS, AIR	:	Case No. 13-cv-02002
FLOW METERS, FUEL INJECTION	:	Case No. 13-cv-02202
SYSTEMS, VALVE TIMING	:	Case No. 13-cv-02402
CONTROL DEVICES, ELECTRONIC	:	Case No. 13-cv-02502
THROTTLE BODIES, RADIATORS,	:	Case No. 13-cv-02602
and ATF WARMERS	:	

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 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 in this Autoparts Antitrust Litigation ("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, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim 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 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 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. 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, PA in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of \$17,163.65 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 2,424.9 hours. The total lodestar for my firm for this period using current hourly billing rates is \$915,265.00.

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

Executed this the 7th day of October, 2015 in Miramar Beach, Florida.

/s/ 
DEWITT M. LOVELACE

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: LOVELACE AND ASSOCIATES, P.A.****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Dewitt M. Lovelace	P	643.00	\$800.00	\$514,400.00
Valerie Lauro	A	667.9	\$350.00	\$233,765.00
Sandy Rosenthal	PL	1,114.00	\$150.00	\$167,100.00
TOTALS		2,424.9		\$915,265.00

P = Partner

C = Counsel

A = Associate

PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: LOVELACE AND ASSOCIATES, PA

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$71.18
Postage Charges	\$91.82
Facsimile Charges	0
Long Distance	\$2,333.66
In-House Photocopying	\$3,726.56
Outside Photocopying	0
Travel (Transportation, lodging, meals, etc.)	\$5,531.78
Court Fees (filing, etc.)	\$226.00
Professional Fees (expert/investigators, etc.)	0
Witness/Service Fees	0
Court Reporter/Transcripts	0
Computer Research	\$5,182.65
Miscellaneous (Describe)	0
TOTAL	\$17,163.65

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Air Flow Meters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	1.90	\$1,520.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	6.40	\$960.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$2,480.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Air Flow Meters
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	1.80	\$1,440.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	11.00	\$1,650.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$3,090.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Alternators
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: ATF Warmers
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	0.00	\$0.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	3.00	\$450.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$450.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: ATF Warmers
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Fuel Injectors
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	2.40	\$1,920.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	22.80	\$3,420.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$5,340.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Fuel Injectors
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Fuel Senders**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	4.00	\$3,200.00
Valerie M. Lauro	A	\$350.00	1.40	\$490.00
Sandy L. Rosenthal	PL	\$150.00	12.30	\$1,845.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$5,535.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Fuel Senders
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **HID Ballasts**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	.50	\$400.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	20.00	\$3,000.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$3,400.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: HID Ballasts
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Ignition Coils**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	2.50	\$2,000.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	11.90	\$1,785.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$3,785.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Ignition Coils
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Inverters
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	1.60	\$1,280.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	11.30	\$1,695.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$2,975.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Inverters
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	26.80	\$21,440.00
Valerie M. Lauro	A	\$350.00	78.10	\$27,335.00
Sandy L. Rosenthal	PL	\$150.00	60.50	\$9,075.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$57,850.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Instrument Panel Clusters
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	141.90	\$113,520.00
Valerie M. Lauro	A	\$350.00	111.10	\$38,885.00
Sandy L. Rosenthal	PL	\$150.00	205.00	\$30,750.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$183,155.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: General
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$16.91
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$40.27
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$1,899.38
Long Distance Telephone Expense	\$2,092.27
Meals	\$
Online Research	\$612.20
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$2,239.56
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$6,900.59

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Motor Generators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	2.3	\$1,840.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	10.10	\$1,515.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$3,355.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Motor Generators
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Occupant Safety Restraint Systems
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	23.40	\$18,720.00
Valerie M. Lauro	A	\$350.00	10.60	\$3,710.00
Sandy L. Rosenthal	PL	\$150.00	21.90	\$3,285.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$25,715.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Occupant Safety Restraint Systems
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Radiators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	0.00	\$0.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	15.10	\$2,265.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$2,265.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Radiators
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Starters
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	6.20	\$4,960.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	20.70	\$3,105.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$8,065.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Starters
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Steering Angle Sensors**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	.50	\$400.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	8.40	\$1,260.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$1,660.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Steering Angle Sensors
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Switches
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	3.50	\$2,800.00
Valerie M. Lauro	A	\$350.00	1.20	\$420.00
Sandy L. Rosenthal	PL	\$150.00	16.90	\$2,535.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$5,755.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Switches
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: **Lovelace and Associates, P.A.**
Case: **Throttle Bodies**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	1.90	\$1,520.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	6.10	\$915.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$2,435.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Throttle Bodies
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Valve Timing Control Devices
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	2.60	\$2,080.00
Valerie M. Lauro	A	\$350.00	0.00	\$0.00
Sandy L. Rosenthal	PL	\$150.00	18.60	\$2,790.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$4,870.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Valve Timing Control Devices
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

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

LODESTAR SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Wire Harness
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	\$800.00	419.20	\$335,360.00
Valerie M. Lauro	A	\$350.00	465.50	\$162,925.00
Sandy L. Rosenthal	PL	\$150.00	632.00	\$94,800.00
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$593,085.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Wire Harness
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$226.00
Delivery Services/Messengers	\$54.27
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$51.55
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$3,632.40
Long Distance Telephone Expense	\$241.39
Meals	\$
Online Research	\$4,570.45
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$1,487.00
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$10,263.06

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

IN RE: AUTOMOTIVE PARTS	:	Master File No. 12-md-02311
ANTITRUST LITIGATION	:	
	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
PRODUCT(S):	:	Case No. 12-cv-00602
	:	Case No. 13-cv-00702
AUTOMOTIVE WIRE HARNESES;	:	Case No. 13-cv-01002
INSTRUMENT PANEL CLUSTERS;	:	Case No. 13-cv-01102
FUEL SENDERS; OCCUPANT	:	Case No. 13-cv-01302
SAFETY RESTRAINT SYSTEMS;	:	Case No. 13-cv-01402
SWITCHES; STEERING ANGLE	:	Case No. 13-cv-01502
SENSORS; HID BALLASTS,	:	Case No. 13-cv-01602
ALTERNATORS, STARTERS,	:	Case No. 13-cv-01702
IGNITION COILS, MOTOR	:	Case No. 13-cv-01802
GENERATORS, INVERTERS, AIR	:	Case No. 13-cv-02002
FLOW METERS, FUEL INJECTION	:	Case No. 13-cv-02202
SYSTEMS, VALVE TIMING	:	Case No. 13-cv-02402
CONTROL DEVICES, ELECTRONIC	:	Case No. 13-cv-02502
THROTTLE BODIES, RADIATORS,	:	Case No. 13-cv-02602
and ATF WARMERS	:	

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

**DECLARATION OF PIERCE GORE
CONCERNING TIME AND EXPENSES INCURRED BY PRATT AND ASSOCIATES,
PA**

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 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 in this Autoparts Antitrust Litigation ("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, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

3. Attached to this Declaration as Exhibit 1 is a summary of time I have spent while involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through September 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by me for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim 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 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. My hourly rates reflected in Exhibit 1 are the usual and customary hourly rates charged by Pratt and Associates, PA in similar complex class action matters and are similar to rates approved for my work by other courts.

5. The total number of hours I have spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 31.4 hours. The total lodestar for my firm for this period using current hourly billing rates is \$26,690.00.

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 October, 2015, in San Jose, California.

/s/ Pierce Gore
Pierce Gore

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: PRATT AND ASSOCIATES, PA****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Pierce Gore	Of Counsel	31.4	\$850.00	\$26,690.00
TOTALS		31.4	\$850.00	\$26,690.00

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: PRATT AND ASSOCIATES, PA

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Arbitrators/Mediators	
Court Fees	
Delivery Services/Messengers	
Deposition/Court Transcripts	
Experts	
In-House Postage Expense	
Litigation Support Vendors	
Local Counsel	
Travel/Meals	
Long Distance Telephone Expense	
Meals	
Online Research	
Other/facsimile charges	
Temporary Professionals	
Document/Database Hosting	
Outside Printing	
Photocopy Expense	
Subpoena Fees	
Trial Transcripts	
Witness Fees	
TOTAL	0

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

LODESTAR SUMMARY

Firm: **Pratt and Associates, P.A.**
Case: **Wire Harness**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Pierce Gore	P	\$850.00	419.20	\$26,690.00
		\$		\$
		\$		\$
		\$		\$
		\$		\$
		\$		\$
TOTALS				\$26,690.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Lovelace and Associates, P.A.
Case: Wire Harness
Reporting Period: Inception to September 15, 2105

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	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$

**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

: Case No. 12-cv-00102

Case No. 12-cv-00202

: Case No. 12-cv-00302

PRODUCT(S):

: Case No. 12-cv-00602

: Case No. 13-cv-00702

AUTOMOTIVE WIRE HARNESSSES;

: Case No. 13-cv-01002

INSTRUMENT PANEL CLUSTERS;

: Case No. 13-cv-01102

FUEL SENDERS; OCCUPANT

: Case No. 13-cv-01302

SAFETY RESTRAINT SYSTEMS;

: Case No. 13-cv-01402

SWITCHES; STEERING ANGLE

: Case No. 13-cv-01502

SENSORS; HID BALLASTS,

Case No. 13-cv-01602

ALTERNATORS, STARTERS,

Case No. 13-cv-01702

IGNITION COILS, MOTOR

Case No. 13-cv-01802

GENERATORS, INVERTERS, AIR

Case No. 13-cv-02002

FLOW METERS, FUEL INJECTION

Case No. 13-cv-02202

SYSTEMS, VALVE TIMING

Case No. 13-cv-02402

CONTROL DEVICES, ELECTRONIC

Case No. 13-cv-02502

THROTTLE BODIES, RADIATORS,

Case No. 13-cv-02602

and ATF WARMERS

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 a partner and CEO at the law corporation of Kakinuki Law Office, PC (the "firm"). I submit this declaration in support of Interim 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 in this Auto Parts Antitrust Litigation (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, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim 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

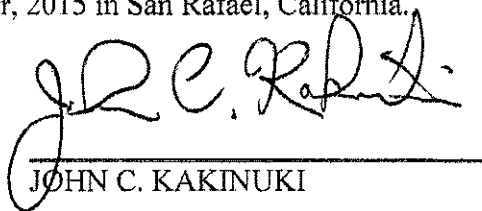
Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The 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.

5. My firm has expended a total of \$26,760.81 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 1,597.20 hours. The total lodestar for my firm for this period using current hourly billing rates is \$1,269,774.00.

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

Executed this the 7th day of October, 2015 in San Rafael, California.



JOHN C. KAKINUKI

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: Kakinuki Law Office, PC

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	0
Postage Charges	0
Facsimile Charges	0
Long Distance	\$33.00
In-House Photocopying	0
Outside Photocopying	0
Travel (Transportation, lodging, meals, etc.)	\$26,727.81
Court Fees (filing, etc.)	0
Professional Fees (expert/investigators, etc.)	0
Witness/Service Fees	0
Court Reporter/Transcripts	0
Computer Research	0
Miscellaneous (Describe)	0
TOTAL	\$26,760.81

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

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John C. Kakinuki	P	\$795.00	22.15	\$17,609.25
TOTALS				\$17,609.25

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **Alternators**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0
Court Fees	\$0
Delivery Services/Messengers	\$0
Deposition / Court Transcripts	\$0
Experts	\$0
In-House Postage Expense	\$0
Litigation Support Vendors	\$0
Local Counsel	\$0
Travel	\$0
Long Distance Telephone Expense	\$0
Meals	\$0
Online Research	\$0
Other	\$0
Temporary Professionals	\$0
Document / Database Hosting	\$0
Outside Printing	\$0
Photocopy Expense	\$0
Subpoena Fees	\$0

Disbursement	Total Amount To Date
Trial Transcripts	\$0
Witness Fees	\$0
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John C. Kakinuki	P	\$795.00	138.50	\$110,107.50
TOTALS				\$110,107.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **General**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0
Court Fees	\$0
Delivery Services/Messengers	\$0
Deposition / Court Transcripts	\$0
Experts	\$0
In-House Postage Expense	\$0
Litigation Support Vendors	\$0
Local Counsel	\$0
Travel	\$2,311.70
Long Distance Telephone Expense	\$0
Meals	\$92.98
Online Research	\$0
Other	\$0
Temporary Professionals	\$0
Document / Database Hosting	\$0
Outside Printing	\$0
Photocopy Expense	\$0
Subpoena Fees	\$0

Disbursement	Total Amount To Date
Trial Transcripts	\$0
Witness Fees	\$0
TOTAL	\$2,404.68

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

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **IPC**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John C. Kakinuki	P	\$795.00	85.60	\$68,052.00
TOTALS				\$68,052.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **IPC**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0
Court Fees	\$0
Delivery Services/Messengers	\$0
Deposition / Court Transcripts	\$0
Experts	\$0
In-House Postage Expense	\$0
Litigation Support Vendors	\$0
Local Counsel	\$0
Travel	\$7,201.28
Long Distance Telephone Expense	\$7.19
Meals	\$527.42
Online Research	\$0
Other	\$0
Temporary Professionals	\$0
Document / Database Hosting	\$0
Outside Printing	\$0
Photocopy Expense	\$0
Subpoena Fees	\$0

Disbursement	Total Amount To Date
Trial Transcripts	\$0
Witness Fees	\$0
TOTAL	\$7,735.89

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

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **OSS**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John C. Kakinuki	P	\$795.00	79.70	\$63,361.50
TOTALS				\$63,361.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **OSS**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0
Court Fees	\$0
Delivery Services/Messengers	\$0
Deposition / Court Transcripts	\$0
Experts	\$0
In-House Postage Expense	\$0
Litigation Support Vendors	\$0
Local Counsel	\$0
Travel	\$849.76
Long Distance Telephone Expense	\$0
Meals	\$106.46
Online Research	\$0
Other	\$0
Temporary Professionals	\$0
Document / Database Hosting	\$0
Outside Printing	\$0
Photocopy Expense	\$0
Subpoena Fees	\$0

Disbursement	Total Amount To Date
Trial Transcripts	\$0
Witness Fees	\$0
TOTAL	\$956.22

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

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **Starters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John C. Kakinuki	P	\$795.00	22.15	\$17,609.25
TOTALS				\$17,609.25

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **Starters**
Reporting Period: **Inception to September 15, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0
Court Fees	\$0
Delivery Services/Messengers	\$0
Deposition / Court Transcripts	\$0
Experts	\$0
In-House Postage Expense	\$0
Litigation Support Vendors	\$0
Local Counsel	\$0
Travel	\$0
Long Distance Telephone Expense	\$0
Meals	\$0
Online Research	\$0
Other	\$0
Temporary Professionals	\$0
Document / Database Hosting	\$0
Outside Printing	\$0
Photocopy Expense	\$0
Subpoena Fees	\$0

Disbursement	Total Amount To Date
Trial Transcripts	\$0
Witness Fees	\$0
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **Wire Harness**
Reporting Period: **Inception – September 30, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John C. Kakinuki	P	\$795.00	1,249.10	\$993,034.50
TOTALS				\$993,034.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: **Wire Harness**
Reporting Period: **Inception to September 30, 2105**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$0
Court Fees	\$0
Delivery Services/Messengers	\$0
Deposition / Court Transcripts	\$0
Experts	\$0
In-House Postage Expense	\$0
Litigation Support Vendors	\$0
Local Counsel	\$0
Travel	\$25,174.66
Long Distance Telephone Expense	\$33.00
Meals	\$1,553.15
Online Research	\$0
Other	\$0
Temporary Professionals	\$0
Document / Database Hosting	\$0
Outside Printing	\$0
Photocopy Expense	\$0
Subpoena Fees	\$0

Disbursement	Total Amount To Date
Trial Transcripts	\$0
Witness Fees	\$0
TOTAL	\$26,760.81

**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

: Case No. 12-cv-00102

: Case No. 12-cv-00202

: Case No. 12-cv-00302

PRODUCT(S):

: Case No. 12-cv-00602

: Case No. 13-cv-00702

AUTOMOTIVE WIRE HARNESSSES;

: Case No. 13-cv-01002

INSTRUMENT PANEL CLUSTERS;

: Case No. 13-cv-01102

FUEL SENDERS; OCCUPANT

: Case No. 13-cv-01302

SAFETY RESTRAINT SYSTEMS;

: Case No. 13-cv-01402

SWITCHES; STEERING ANGLE

: Case No. 13-cv-01502

SENSORS; HID BALLASTS,

: Case No. 13-cv-01602

ALTERNATORS, STARTERS,

: Case No. 13-cv-01702

IGNITION COILS, MOTOR

: Case No. 13-cv-01802

GENERATORS, INVERTERS, AIR

: Case No. 13-cv-02002

FLOW METERS, FUEL INJECTION

: Case No. 13-cv-02202

SYSTEMS, VALVE TIMING

: Case No. 13-cv-02402

CONTROL DEVICES, ELECTRONIC

: Case No. 13-cv-02502

THROTTLE BODIES, RADIATORS,

: Case No. 13-cv-02602

and ATF WARMERS

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. I submit this declaration in support of Interim 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 in this Autoparts Antitrust Litigation ("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, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

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 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim 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 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 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not

been reached. 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.

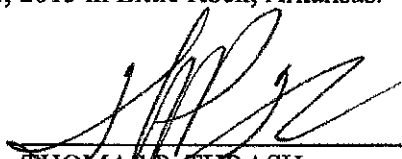
5. My firm has expended a total of \$7,890.79 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 1,488.80 hours. The total lodestar for my firm for this period using current hourly billing rates is \$929,482.50.

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

Executed this the 7th day of October, 2015 in Little Rock, Arkansas.



THOMAS P. THRASH

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: THRASH LAW FIRM, P.A.****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Thomas P. Thrash	P	832.25	\$800.00	\$665,800.00
Marcus Bozeman	C	330.40	\$650.00	\$214,760.00
Cyndi Arterbury	PL	326.15	\$150.00	\$48,922.50
TOTALS		1488.80		\$929,482.50

P = Partner

C = Counsel

A = Associate

PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: THRASH LAW FIRM, P.A.

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$325.65
Postage Charges	\$74.30
Facsimile Charges	
Long Distance	
In-House Photocopying	\$2,824.40
Outside Photocopying	\$20.00
Travel (Transportation, lodging, meals, etc.)	\$3,381.44
Court Fees (filing, etc.)	\$350.00
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$115.00
Miscellaneous (Describe) Temporary Professionals	\$800.00
TOTAL	\$7,890.79

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Air Flow Meters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.70	\$1,360.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cyndi B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$1,465.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Air Flow Meters**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.90	\$1,520.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cydni B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$1,625.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Alternators**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Fuel Injection Systems**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.90	\$1,520.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cydni B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$1,625.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Fuel Injection Systems**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Fuel Senders**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	6.70	\$5,360.00
Marcus N. Bozeman	A	\$650.00	17.25	\$11,212.50
Cyndi B. Arterbury	PL	\$150.00	2.30	\$345.00
TOTALS				\$16,917.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Fuel Senders**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$52.20
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$52.20

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	394.55	\$315,640.00
Marcus N. Bozeman	A	\$650.00	61.45	\$39,942.50
Cydni B. Arterbury	PL	\$150.00	181.65	\$27,247.50
TOTALS				\$382,830.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **General**Reporting Period: **Inception to September 15, 2015**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers (FedEx)	\$325.65
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$1221.29
Long Distance Telephone Expense	\$
Meals	\$153.91
Online Research	\$10.20
Other (Assessments)	\$78,000.00
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$652.60
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$80,363.65

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Motor Generators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.70	\$1,360.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cyndi B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$1,465.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Motor Generators**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Ballasts**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	2.90	\$2,320.00
Marcus N. Bozeman	A	\$650.00	6.50	\$4,225.00
Cyndi B. Arterbury	PL	\$150.00	0.30	\$45.00
TOTALS				\$6,590.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **HID Ballasts**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Ignition Coils**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	4.40	\$3,520.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cyndi B. Arterbury	PL	\$150.00	1.55	\$232.50
TOTALS				\$3,752.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Ignition Coils**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Instrument Panel Clusters (IPC)**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	37.30	\$29,840.00
Marcus N. Bozeman	A	\$650.00	49.20	\$31,980.00
Cyndi B. Arterbury	PL	\$150.00	9.80	\$1,470.00
TOTALS				\$63,290.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**

Firm: Thrash Law Firm, P.A.
Case: Instrument Panel Clusters (IPC)
Reporting Period: Inception to September 15, 2015

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$35.60
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$35.60

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Inverters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.90	\$1,520.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cydni B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$1,625.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Inverters**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Occupant Safety Systems (OSS)**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	22.45	\$17,960.00
Marcus N. Bozeman	A	\$650.00	14.70	\$9,555.00
Cyndi B. Arterbury	PL	\$150.00	7.75	\$1,162.50
TOTALS				\$28,677.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**

Firm: **Thrash Law Firm, P.A.**
Case: **Occupant Safety Systems (OSS)**
Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$46.60
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$46.60

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Radiators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	0.90	\$720.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cyndi B. Arterbury	PL	\$150.00	0.30	\$45.00
TOTALS				\$765.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Radiators**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Starters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.90	\$1,520.00
Marcus N. Bozeman	A	\$650.00	0.00	\$0.00
Cyndi B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$1,625.00

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Starters**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Steering Angle Sensors**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	1.90	\$1,520.00
Marcus N. Bozeman	A	\$650.00	9.75	\$6,337.50
Cyndi B. Arterbury	PL	\$150.00	0.70	\$105.00
TOTALS				\$7,962.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Steering Angle Sensors**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

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

LODESTAR SUMMARY

Firm: **Thrash Law Firm, P.A.**
Case: **Switches**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	\$800.00	3.60	\$2,880.00
Marcus N. Bozeman	A	\$650.00	0.50	\$325.00
Cydni B. Arterbury	PL	\$150.00	1.75	\$262.50
TOTALS				\$3,467.50

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Switches**Reporting Period: **Inception to September 15, 2015**

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	\$
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0.00

In Re: Auto Parts Antitrust Litigation**MDL 2311****EXPENSE / DISBURSEMENT SUMMARY**Firm: **Thrash Law Firm, P.A.**Case: **Wire Harness**Reporting Period: **Inception to September 15, 2015**

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$350.00
Delivery Services/Messengers	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$74.30
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$1632.29
Long Distance Telephone Expense	\$
Meals	\$373.95
Online Research	\$104.80
Other	\$
Temporary Professionals (Landers Copying Documents)	\$800.00
Document / Database Hosting	\$
Outside Printing	\$20.00
Photocopy Expense	\$2037.40
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$5392.74

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

IN RE: AUTOMOTIVE PARTS	:	Master File No. 12-md-02311
ANTITRUST LITIGATION	:	
	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
PRODUCT(S):	:	Case No. 12-cv-00602
	:	Case No. 13-cv-00702
AUTOMOTIVE WIRE HARNESSES;	:	Case No. 13-cv-01002
INSTRUMENT PANEL CLUSTERS;	:	Case No. 13-cv-01102
FUEL SENDERS; OCCUPANT	:	Case No. 13-cv-01302
SAFETY RESTRAINT SYSTEMS;	:	Case No. 13-cv-01402
SWITCHES; STEERING ANGLE	:	Case No. 13-cv-01502
SENSORS; HID BALLASTS,	:	Case No. 13-cv-01602
ALTERNATORS, STARTERS,	:	Case No. 13-cv-01702
IGNITION COILS, MOTOR	:	Case No. 13-cv-01802
GENERATORS, INVERTERS, AIR	:	Case No. 13-cv-02002
FLOW METERS, FUEL INJECTION	:	Case No. 13-cv-02202
SYSTEMS, VALVE TIMING	:	Case No. 13-cv-02402
CONTROL DEVICES, ELECTRONIC	:	Case No. 13-cv-02502
THROTTLE BODIES, RADIATORS,	:	Case No. 13-cv-02602
and ATF WARMERS	:	
	:	
This Document Relates to:	:	Hon. Marianne O. Battani
	:	
ALL DEALERSHIP ACTIONS	:	

**DECLARATION OF CHARLES BARRETT
CONCERNING TIME AND EXPENSES INCURRED BY CHARLES BARRETT, PC**

I, Charles Barrett, declare as follows:

1. Until September 15, 2015 I was a partner at the law firm of Charles Barrett, PC. I now am an attorney at Neal & Harwell, PLC. I submit this declaration in support of Interim

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 in this Autoparts Antitrust Litigation ("the Actions").

2. My firm Charles Barrett, PC represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm was involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

- Client retention;
- Preparation of pleadings, motions and supporting briefs, and legal research;
- Preparing and responding to written discovery requests, including depositions;
- Litigation strategy and analysis (meetings, conference calls, misc. strategy);
- Class certification;
- Trial preparation and trial;
- Investigation and research;
- Preparation for and court appearances;
- Appeals;
- Management and administration;
- Settlement and settlement negotiations; and
- Travel.

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by Charles Barrett, PC's attorneys and professional staff who were involved in these Actions, and the lodestar calculation based on the firm's current and historic billing rates, from the inception of the cases through September 15, 2015. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim 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 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 does not include

time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 is the usual and customary hourly rates charged by Charles Barrett, PC in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of \$11,769.93 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through September 15, 2015. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to 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 and have not been reimbursed.

6. The total number of hours Charles Barrett, PC has spent representing Dealership Plaintiffs in the Actions from inception through September 15, 2015 is 587.4 hours. The total lodestar for the firm for this period using current hourly billing rates is \$203,455.00.

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

Executed this the 7th day of October, 2015 in Nashville, Tennessee

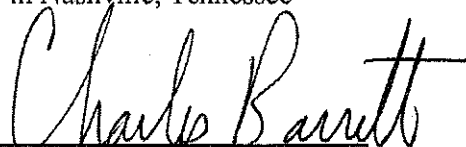
/s/ 
CHARLES BARRETT

EXHIBIT 1**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT****Firm Name: CHARLES BARRETT, PC****Reporting Period: Inception– September 15, 2015**

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Charles Barrett	P	481.2	*See Exhibit 1 for current and historic rates	\$192,835.00
Dawn Garrison	PL	106.2	\$100.00	\$10,620.00
TOTALS		587.4		\$203,455.00

P = Partner

C = Counsel

A = Associate

PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2*IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION*

FIRM NAME: CHARLES BARRETT, PC

REPORTING PERIOD: INCEPTION THROUGH SEPTEMBER 15, 2015

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$1,798.87
Postage Charges	\$64.26
Facsimile Charges	0
Long Distance	\$
In-House Photocopying	\$
Outside Photocopying	\$222.76
Travel (Transportation, lodging, meals, etc.)	\$5,565.44
Court Fees (filing, etc.)	\$
Professional Fees (expert/investigators, etc.)	0
Witness/Service Fees	0
Court Reporter/Transcripts	0
Computer Research	\$
Miscellaneous (Describe) Document Review	\$4,118.60
TOTAL	\$11,769.93

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Air Flow**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	4.8	\$1,920.00
Dawn Garrison	PL	\$100		
TOTALS			4.8	\$1,920.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Air Flow
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Alternators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400		
Dawn Garrison	PL	\$100		
TOTALS			-0-	

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Alternators
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **AFT Warmers**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	5.6	\$2,240.00
Dawn Garrison	PL	\$100		
TOTALS			5.6	\$2,240.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: AFT Warmers
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Electronic Throttle**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400		
Dawn Garrison	PL	\$100		
TOTALS			-0-	

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Electronic Throttle
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Fuel Injection**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400		
Dawn Garrison	PL	\$100		
TOTALS			-0-	

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Fuel Injection
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Fuel Senders**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	19.7	\$7,880.00
Dawn Garrison	PL	\$100	.5	\$50.00
TOTALS			20.2	\$7,930.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Fuel Senders
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **General**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	53.9	\$21,560.00
Dawn Garrison	PL	\$100	2.6	\$260.00
TOTALS			56.5	\$21,820.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: General
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Generators**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	1.5	\$600.00
Dawn Garrison	PL	\$100		
TOTALS			1.50	\$600.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Generators
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **HID**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	4.2	\$1,680.00
Dawn Garrison	PL	\$100		
TOTALS			4.2	\$1,680.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: HID
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Ignition**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	.70	\$280.00
Dawn Garrison	PL	\$100		
TOTALS			.70	\$280.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Ignition
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Inverters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	4.7	\$1,880.00
Dawn Garrison	PL	\$100		
TOTALS			4.70	\$1,880.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Inverters
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **IPC**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425	.4	\$170.00
Charles F. Barrett	P	\$400	69	\$27,600.00
Dawn Garrison	PL	\$100	2.3	\$230.00
TOTALS			71.70	\$28,000.00

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

Legal Administrative Assistant (LAA)

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: IPC
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **OSS**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425	.5	\$212.50
Charles F. Barrett	P	\$400	58.2	\$23,280.00
Dawn Garrison	PL	\$100	2.3	\$230.00
TOTALS			61	\$23,722.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: OSS
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: Charles Barrett
Case: Radiators
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400		
Dawn Garrison	PL	\$100		
TOTALS			-0-	

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Radiators
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Starters**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	.5	\$80.00
Dawn Garrison	PL	\$100		
TOTALS			.5	\$80.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: **Starters**
Reporting Period: **Inception to September 15, 2105**

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Steering Angle**
Reporting Period: **Inception – September 15, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	1.6	\$640.00
Dawn Garrison	PL	\$100		
TOTALS			1.6	\$640.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Steering Angle
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: Charles Barrett
Case: Switches
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	1.1	\$440.00
Dawn Garrison	PL	\$100		
TOTALS			1.1	\$440.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Switches
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: Charles Barrett
Case: Valve Timing
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425		
Charles F. Barrett	P	\$400	2	\$800.00
Dawn Garrison	PL	\$100		
TOTALS			2	\$800.00

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Valve Timing
Reporting Period: Inception to September 15, 2105

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-document review	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$0

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

LODESTAR SUMMARY

Firm: Charles Barrett
Case: Wire Harness
Reporting Period: Inception – September 15, 2015

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	\$425	13.3	\$5,652.50
Charles F. Barrett	P	\$400	239.9	\$95,960.00
Dawn Garrison	PL	\$100	98.1	\$9,810.00
TOTALS			351.3	\$111,422.50

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

Legal Administrative Assistant (LAA)

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

EXPENSE / DISBURSEMENT SUMMARY

Firm: Charles Barrett
Case: Wire Harness
Reporting Period: Inception to September 15, 2105

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$1,798.87
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$64.26
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$5,565.44
Long Distance Telephone Expense	\$
Meals	\$
Online Research	\$
Other-document review	\$4,118.60
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$222.76
Photocopy Expense	\$
Subpoena Fees	\$

Disbursement	Total Amount To Date
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$11,769.93