

**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 HARNESSES	:	2:12-cv-00102
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
ANTI-VIBRATION RUBBER PARTS	:	2:13-cv-00802
WINDSHIELD WIPERS	:	2:13-cv-00902
RADIATORS	:	2:13-cv-01002
STARTERS	:	2:13-cv-01102
AUTOMOTIVE LAMPS	:	2:12-cv-01202
IGNITION COILS	:	2:13-cv-01402
HID BALLASTS	:	2:12-cv-01702
ELECTRONIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FAN MOTORS	:	2:13-cv-02102
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
POWER WINDOW MOTORS	:	2:13-cv-02302
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
WINDSHIELD WASHERS	:	2:13-cv-02802
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
MINIMODULES	:	2:17-cv-04302
SIDE DOOR LATCHES	:	2:17-cv-13005
	:	
This Document Relates to:	:	Hon. Marianne O. Battani
	:	
ALL DEALERSHIP ACTIONS	:	

**AUTO DEALERS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FOR ROUND THREE SETTLEMENTS**

Pursuant to Federal Rule of Civil Procedure 23(h) and Federal Rule of Civil Procedure 54(d)(2), the Interim Co-Lead Counsel for the Auto Dealers will move the Court for an Order awarding attorneys' fees, reimbursement of past expenses, and allowing them to set aside a fund for future litigation expenses.

Dated:

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CERTIFICATE OF SERVICE

I, Gerard V. Mantese, hereby certify that I caused a true and correct copy of **AUTO DEALERS' MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE FOR FUTURE LITIGATION EXPENSES FOR ROUND THREE SETTLEMENTS** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on August 1, 2018

s/ Gerard V. Mantese

Gerard V. Mantese

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

**AUTO DEALERS' MEMORANDUM IN SUPPORT OF
MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FROM ROUND THREE SETTLEMENTS**

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Statement of the Issues Presented

1. Should counsel for the Auto Dealers, who obtained more than \$115 million in this group of Auto Dealer class settlements, be awarded a portion of those settlements for attorneys' fees?

Yes

2. Should counsel for the Auto Dealers be reimbursed the out-of-pocket expenses they paid in pursuing the cases in which settlements have been presented?

Yes

3. Should a portion of the settlement funds be set aside for future expenses incurred on behalf of the Auto Dealers in the cases involved in these settlements?

Yes

Controlling or Most Apposite Authorities

Blum v. Stenson, 465 U.S. 886, 104 S. Ct. 1541, 79 L. Ed. 2d 891 (1984)

Boeing Co. v. Van Gemert, 444 U.S. 472, 100 S. Ct. 745, 62 L. Ed. 2d 676 (1980)

In re Cardizem CD Antitrust Litig., 218 F.R.D. 508 (E.D. Mich. 2003)

In re Delphi Corp. Sec., Derivative & ERISA Litig., 248 F.R.D. 483 (E.D. Mich. 2008)

Rawlings v. Prudential-Bache Properties, Inc., 9 F.3d 513 (6th Cir. 1993)

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Background

Counsel for the Auto Dealers have negotiated and presented to the Court a third group (“Round Three”) of settlements totaling more than \$115 million. These settlements represent another substantial step to concluding this litigation: the settlements cover 23 Defendant groups and 25 different parts. By the time this motion is heard, eligible Auto Dealers will have received their payments from the Round One and Round Two settlements. Remarkably, some Auto Dealer class members have *already* received Round One settlement payments of more than \$1 million dollars.

Like the first groups of Auto Dealer settlements, the Round Three settlements also provide significant non-cash benefits, such as fulsome cooperation from the settling Defendants and injunctive relief against most settling defendants prohibiting anti-competitive behavior. All of the net proceeds from the Round Three settlements will be paid to eligible new car automobile dealerships—there is no reversion to Defendants or *cy pres* payments to third-party charities.

Counsel for the Auto Dealers have zealously pursued this complex antitrust litigation and the Defendants have mounted aggressive defenses. The Defendants resolutely maintain that the Auto Dealers did not suffer an antitrust injury and that, even if they did, litigation classes cannot be certified. The Round Three settlements provide substantial benefits to Auto Dealer class members and are remarkable in light of the complexity of this litigation.

Pursuant to Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure, Interim Co-Lead Counsel for the Auto Dealers submit this motion in support of their request for: (1) reimbursement of litigation expenses already incurred in the cases in the Round Three settlements; (2) leave to set aside three percent of the settlement funds for future litigation expenses; and (3) an award of attorneys’ fees of \$33,626,155 from the settlements (30 percent of the net settlement proceeds).

Factual and Procedural Background

A. Disbursement of Round One and Round Two Settlements.

The primary aim of these actions is the recovery and reimbursement of overcharges that Auto Dealers paid as a result of the antitrust violations alleged in the complaints. Counsel for the Auto Dealers, working with the claim administrator and the court-appointed allocation consultant, have already disbursed the Round One settlement funds to eligible Auto Dealers. (Raiter Decl.) Some Round One settlement payments exceeded \$1 million, the highest being more than \$3 million. (Raiter Decl.)

Counsel for the Auto Dealers expect that the Round Two settlement payments will be disbursed to eligible Auto Dealers in August 2018. (Raiter Decl.) The Round Two payments should be roughly twice as large as payments made in Round One. *Id.*

B. Settlements Achieved Since the Round Two Final Approvals.

Since the Round Two final approvals, the Court has granted preliminary approval for Auto Dealer settlements with 23 Defendant groups covering 25 different parts. These settlements provide substantial cash benefits, injunctive relief as to most of the Round 3 settling Defendants, and valuable cooperation while the Auto Dealers continue to prosecute their remaining claims in this MDL. The settlements included in Round Three total more than \$115 million and are set out below, grouped by the parts case at issue:

Auto Dealer Round Three Settlements			
Automotive Parts Case	Settling Defendant Group	Amount Settled	Settlement Amount
Anti-Vibration Rubber Parts	Yamashita	\$1,920,000.00	\$22,125,255.47
	Toyo	\$10,845,255.47	
	Bridgestone	\$9,360,000.00	

Automotive Lamps	Mitsuba	\$76,381.91	\$6,914,575.91
	Koito	\$6,838,194.00	
Automotive Constant Velocity Joint Boot Products	Toyo	\$554,744.53	\$554,744.53
Bearings	NTN	\$2,076,000.00	\$15,787,206.00
	JTEKT	\$13,711,206.00	
Body Sealings	NRC	\$11,880,000.00	\$11,880,000.00
Brake Hoses	Hitachi Metals	\$360,000.00	\$360,000.00
Ceramic Substrates	NGK	\$3,840,000.00	\$3,840,000.00
Electronic Powered Steering Assemblies	Yamada	\$744,000.00	\$2,086,261.34
	JTEKT	\$1,288,794.00	
	Mitsuba	\$53,467.34	
Exhaust Systems	Eberspächer	\$432,000.00	\$432,000.00
Fan Motors	Mitsuba	\$1,157,185.93	\$1,157,185.93
Fuel Injection Systems	Aisan	\$1,440,000.00	\$2,788,816.88
	Mitsuba	\$435,376.88	
	Bosch	\$913,440.00	
Heater Control Panels	Alps	\$1,020,000.00	\$1,020,000.00
HID Ballasts	Koito	\$421,806.00	\$421,806.00
Ignition Coils	Diamond Electric	\$1,704,000.00	\$1,704,000.00
Interior Trim	INOAC	\$780,000.00	\$780,000.00
Power Window Motors	Mitsuba	\$6,057,085.43	\$6,057,085.43
Radiators	Mitsuba	\$1,157,185.93	\$1,157,185.93
Shock Absorbers	HIAMS	\$4,200,000.00	\$4,200,000.00

Side-Door Latches and Latch Minimodules	Kiekert	\$720,000.00	\$720,000.00
Spark Plugs, Standard Oxygen Sensors, Air Fuel Ratio Sensors	Bosch	\$9,157,632.00	\$9,157,632.00
Starters	Bosch	\$328,416.00	\$3,314,948.66
	Mitsuba	\$2,986,532.66	
Valve Timing Control Devices	Aisin Seiki	\$5,880,000.00	\$5,880,000.00
Windshield Washer Systems	Mitsuba	\$488,844.22	\$488,844.22
Windshield Wiper Systems	Mitsuba	\$10,387,939.70	\$10,548,451.70
	Bosch	\$160,512.00	
Wire Harness Systems	Tokai Rika	\$240,000.00	\$1,804,800.00
	G.S. Electech	\$960,000.00	
	Chiyoda	\$604,800.00	
Total			\$115,180,799.90

The total money recovered in Auto Dealer settlements in Round One (\$58,947,900.00), Round Two (\$124,730,927.00), and Round Three (\$115,180,799.90) is \$298,859,626.00.¹ Counsel for the Auto Dealers have presented additional settlements for preliminary approval and continue to negotiate and finalize new agreements with Defendants who have not yet settled. (Raiter Decl.) These settlements will be presented to the Court as Round Four Auto Dealer settlements. *Id.*

¹ As of July 31, 2018, the Round Three settlement funds had earned interest totaling \$847,659.26 and had paid taxes and tax preparation fees of \$135,850 for a net gain of \$711,809.26 (Raiter Decl.)

C. Counsel for Auto Dealers Have Devoted Significant Resources to Obtain the Auto Dealer Settlements in this Litigation.

1. The Complexity of this Litigation.

The Department of Justice (“DOJ”) 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 from certain Defendants fines totaling billions of dollars. The conduct involves a large number of parts, affected models, and conspiring participants. Most of the Defendant groups have had one or more of their employees or corporate affiliates convicted of a serious crime in the United States, Europe, and/or Asia. The 160 Defendants include well-known companies that are dominant players in their industries. There are 41 separate antitrust class actions alleging distinct violations of antitrust and/or consumer protection laws, making this a decidedly complex litigation.

Although the DOJ has prosecuted the criminal aspects of the price-fixing and bid rigging, it did not seek restitution for those injured by the conduct. The guilty pleas specifically note that “[i]n light of the availability of civil causes of action, which potentially provide for a recovery of multiple actual damages, the recommended sentence does not include a restitution order . . .” *See, e.g.,* Plea Agreement, Mitsuba Corp., *United States v. Mitsuba Corp.*, No. 2:13-cr-20712, para. 10(c), ECF Doc. No. 10 (E.D. Mich. 2013). Without these actions, Auto Dealers would have been left without a remedy unless they each decided to sue more than 160 defendants in dozens of individual cases.

2. The Time and Resources Devoted to Achieve These Settlements.

Antitrust litigation is inherently risky, with high stakes, and the outcome of this litigation has never been 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. While working efficiently, counsel for the Auto Dealers could not have effectively represented these class members without the commitment of a substantial amount of time, effort, and money.

The Auto Dealers asserted damage claims under the 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; others permit them under state consumer protection laws; and others permit them under general laws of restitution. Nearly every Defendant moved to dismiss the Auto Dealers' claims, while others challenged personal jurisdiction. For the most part, the Auto Dealers prevailed on those motions.

Some of the attorneys for the Auto Dealers worked full-time on this litigation. It has been and will continue to be a huge undertaking as the cases progress through discovery, to class certification, and then to trial if necessary. Counsel for the Auto Dealers have performed the following type of work to advance the cases in the Round Three settlements:

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

- Receipt of cooperation materials from amnesty applicants, and attending in-person proffers from amnesty applicants who disclose the details of the conspiracies;
- Drafting, preparing for, and arguing numerous oppositions to motions to dismiss;
- Drafting and opposing numerous discovery motions, motions to quash, and other discovery sought by the Defendants from the Auto Dealers;
- Negotiating dealership and discovery issues with defense counsel including innumerable meet-and-confer sessions, each of which required substantial preparation;
- Preparing correspondence with respect to timing, stipulations, and case planning issues;
- Corresponding and attending calls with dealership co-counsel regarding client discovery and trial preparation issues;
- Obtaining and analyzing documents and data from over 40 class representative dealerships, including many in-person trips to the dealerships;
- Locating, review, redaction, and production of nearly 1 million pages of documents from class representative dealerships;
- Exchanging information and coordinating with end-payor, direct purchaser, truck and equipment dealers, City of Richmond, California, Florida, and Ford counsel regarding various issues;
- Attending calls and meetings to help formulate 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;
- Exchanging information and conferring with counsel for the other Plaintiff groups regarding various discovery, procedural, and substantive issues;
- Attending MDL status conferences and motions with Judge Battani and conferences and motions with the discovery Special Master;
- Preparing for, traveling to, and attending more than 140 depositions of third-party automobile dealerships and class representative dealerships;

- Preparing for, traveling to, and attending more than 190 depositions of Defendants and their representatives;
- Preparing, through Japanese-speaking attorneys, key deposition outlines and strategy used by all Plaintiffs' groups in this litigation;
- Preparing for class certification motions by analyzing thousands of pages of depositions, thousands of pages of key discovery, working with experts, analyzing relevant case law, and drafting pleadings;
- Performing all the tasks necessary to reach more than 60 settlements, including formulating demands, negotiating, in some cases mediation, dozens of in-person meetings, exchange of drafts, preparing escrow agreements;
- Drafting settlement agreements, preliminary approval motions, and in some cases attend and argue preliminary approval motions;
- Analyzing discovery and materials received from cooperating Defendants and working with the special allocation consultant to develop allocation plans for each of the dozens of parts for which Auto Dealer settlements have been reached;
- Receiving cooperation materials from settling Defendants, attend in-person proffers from settling Defendants who disclose the details of the conspiracies, and review and analyze cooperation materials from settling Defendants and incorporate that information into the ongoing case strategy; and
- Drafting notices, claim forms, and other settlement-related documents and consult with the special allocation consultant and claims administrator

(See generally, Raiter Decl.)

The Auto Dealers were the primary target of Defendants' discovery efforts and have responded to countless discovery requests relating to nearly every aspect of an automobile dealer's business. Counsel for the Auto Dealers weathered ongoing motions to compel, meet and confers, and innumerable communications from defense counsel about the Auto Dealers and their data, documents, and information. Defendants sought documents and data located on any computer, database, or back-up tape anywhere in the dealerships, as well as hard copy documents located throughout the dealerships. Defendants also sought documents and other electronic data from the automobile dealership class representatives, including: (1) 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.)

Over the Auto Dealers' objections, the Defendants insisted on taking an unlimited number of depositions of non-party automobile dealerships. The Court granted the Defendants' request and Defendants took more than 100 such depositions. (Raiter Decl.) Counsel for the Auto Dealers prepared for and attended these depositions, while at the same time defending the depositions of the Auto Dealer class representatives. *Id.* Defendants conducted approximately 140 depositions of class representative and third-party Auto Dealers in this litigation. *Id.*

Counsel for the Auto Dealers also invested considerable time, effort, and money in the prosecution of discovery and liability claims against the Defendants. This work included the review, translation, and analysis of millions of pages of documents Defendants produced to the DOJ and to the Plaintiffs in this litigation. Several Japanese-speaking attorneys for the Auto Dealers prepared and led the deposition questioning of Defendant representatives and received numerous informal witness statements from cooperating and settling Defendants. Counsel for the Auto Dealers received, analyzed, and put to use in the litigation the documents and other information received from the settling and cooperating Defendants. Finally, counsel for the Auto Dealers worked with their experts to prepare the opinions and economic models used to support class certification, damages, and at trial. (Raiter Decl.)

3. The Auto Dealers' Unique Position in this Litigation.

Because of their role as intermediate indirect purchasers, the Auto Dealers shouldered the

burden of a disproportionate amount of discovery aimed at them by the Defendants. The Defendants sought discovery regarding both the Auto Dealers' claims and antitrust injury and the injury claimed by the End Payors. (Raiter Decl.) Since the Auto Dealer class representatives run businesses and generate financial and other records that Defendants believe are relevant to damage and pass on issues, the Auto Dealers were targeted for discovery that in reality related to the End Payors' claims. *Id.* The Auto Dealers were, and are, the primary focus of the Defendants' discovery relating to the transfer of antitrust overcharges through the indirect purchaser chain. As will be discussed in greater detail below, this required a substantial amount of work by counsel for the Auto Dealers that was not directly proportional to the settlements achieved for the Auto Dealers' benefit.

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

In this group of settlements, the Auto Dealers seek final approval of settlements with 23 different Defendants and their affiliates. The Round Three settlements involve Auto Dealer claims covering 25 different parts and total more than \$115 million. The Round Three settlements at issue in this motion are listed by Defendant and by part in Appendix A to this brief.

The Round Three settlements are the result of substantial litigation and negotiations by experienced counsel. Some of the Defendants involved in these settlements were at the forefront of the defense of the Auto Dealer claims and had mounted vigorous defenses. The settlements were reached through lengthy negotiations and in each case, counsel was armed with transactional data, documents produced in discovery, cooperation materials, and a strong understanding of the claims and defenses. (Raiter Decl.) A number of the settlements were only reached after mediation, sometimes involving multiple sessions, with the Court-appointed mediators. *Id.*

Attorneys' Fees and Expenses Standard of Review.

Rule 23(h) of the Federal Rules of Civil Procedure 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 will then analyze and weigh the six factors described in *Ramey v. Cincinnati Enquirer, Inc.*, 508 F.2d 1188 (6th Cir. 1974).

The “percentage of the fund” fee award sought by counsel for the Auto Dealers is supported by Sixth Circuit precedent, *see Rawlings v. Prudential-Bache Properties, Inc.*, 9 F.3d 513, 516 (6th Cir. 1993), and the amount sought is well within the range of fee awards made by courts in this and other Circuits. *See, e.g., In re Prandin Direct Purchaser Antitrust Litig.*, No. 2:10-CV-12141-AC-DAS, 2015 WL 1396473 (E.D. Mich. Jan. 20, 2015) (awarding one-third of the fund). 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 516. In common fund cases, the award of attorneys’ fees need only “be reasonable under the circumstances.” *Id.*

Argument

I. The Court Should Reimburse Class Counsel for Unreimbursed Past Expenses and Should Approve a Set Aside for Future Litigation Expenses.

Since the Court’s orders regarding expenses related to the Round One and Round Two settlements, counsel for the Auto Dealers have incurred and paid expenses that were not reimbursed

through those orders and were not reimbursed from those future expense funds. Counsel for the Auto Dealers seek reimbursement for those costs. Counsel for the Auto Dealers also request that three percent of the Round Three settlements be set aside for future litigation expenses for the cases included in those settlements.

A. Reimbursement of Costs Already Incurred.

The future litigation funds previously allowed by the Court have been used to fund ongoing litigation expenses for the parts cases in the Round One and Round Two settlement groups. (Declaration of Marie Thomas; Raiter Decl.) Because some of the settlements in Round Three involve parts for which no prior settlements had been reached (and hence no future expense funds were created), counsel for the Auto Dealers have paid the expenses required to advance the litigation for the different parts / cases not involved in the Round One and Round Two settlements. *Id.* Having achieved the settlements currently before the Court, counsel for the Auto Dealers should be reimbursed the litigation expenses incurred in the settled cases for which a future expense fund was not previously established.

Unreimbursed litigation expenses incurred in the cases involved in the settlements should be awarded to counsel for the Auto Dealers. *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.)); *In re Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 535 (E.D. Mich. 2003); *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 **\$358,125.09** in litigation expenses in the Round Three cases for which a future expense fund was not established. (*See* Thomas Decl.; Raiter Decl.; Declarations of Don Barrett, Jonathan Cuneo, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore). These costs included expenses related to: (1) experts, (2) document review, gathering, hosting, and production, (3) mediator expenses, (4) domestic and international travel, and (5) other reasonable litigation expenses. *Id.* These unreimbursed expenses are properly awarded, on a *pro rata* basis, from the Round Three settlements.

B. Future Litigation Expenses.

Auto Dealers also request approval to set aside a portion of the Round Three settlement proceeds to be used for future litigation expenses in the claims remaining against the non-settling Defendants, to be used in the parts cases included in the Round Three settlements. The requested set aside is three percent of the settlements (**\$3,455,423.97**), which would be deducted on a *pro rata* basis from the settlements. Money that is not used for future expenses would be distributed to eligible settlement class members. A chart that illustrates the proposed *pro rata* reduction of the past and future expenses from the settlements at issue is provided with this brief as Appendix A.

The Court has granted similar requests by the Auto Dealer, End Payors, and Direct Purchasers. Allowing a portion of the settlement funds to be used for future expenses is a well-accepted practice. *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 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”); *In re Linerboard Antitrust Litig.*, 292 F. Supp. 2d 631, 643 (E.D. Pa. 2003) (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 37.5 percent set aside for 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 to set aside to pay outstanding and future litigation costs); *In re WorldCom, Inc. Sec. Litig.*, No. 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); *In re California Micro Devices Sec. Litig.*, 965 F.Supp. 1327, 1337 (N.D. Cal. 1997) (approving 7.9 percent of approximately \$19 million settlement fund for future litigation expenses).

The size and complexity of this litigation has necessitated very significant expenses, and, as the remaining cases progress to class certification, the expenses—particularly those associated with experts—will increase exponentially. In antitrust cases, experts typically create economic and damages models that describe the mechanisms and impact of the anti-competitive behavior. Given the scope and complexity of the issues in these cases, counsel for the Auto Dealers expect that the cost of this work by their experts will be millions of dollars. (Raiter Decl.)

The Auto Dealers will also incur additional costs related to ongoing discovery. These costs include the significant expense of hosting and reviewing documents and data, interviews of cooperating witnesses, travel expenses, research, and experts. (Raiter Decl.) The Auto Dealers may also need to seek class certification, issue class notice, and proceed to trial against some of the remaining Defendants. Counsel for the Auto Dealers therefore believe that the amount they are requesting be set aside for future expenses is reasonable.

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

The Round Three settlements total more than \$115 million for the benefit of the Auto Dealers. Counsel for the Auto Dealers litigated these cases on a contingent basis, some for more than six years, and have spent tens of thousands of hours in the cases in which settlements have

been reached. Although the Court awarded fees from the first settlement groups, the work done by counsel for the Auto Dealers still exceeds the fees awarded. Counsel for the Auto Dealers request an interim award of attorneys' fees based on the work done to achieve the Round Three settlements, which includes work performed prior to the Auto Dealers' first settlement groups.

Fee awards for settlements are appropriate in large-scale litigation in which settlements are reached periodically. *See In re Air Cargo Shipping Servs. Antitrust Litig.*, No. 06-MD-1775 JG VVP, 2011 WL 2909162, at *5–7 (E.D.N.Y. July 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 litigated these cases for six years and will continue to vigorously represent the interests of the dealership class members. An award of fees on these settlements is appropriate. *See In re Air Cargo Shipping Serv. Litig.*, No. 06-md-1775, 2015 WL 5918273 (E.D.N.Y. Oct. 9, 2015) (awarding fourth round of interim fees); *In re Diet Drugs Prod. Liab. Litig.*, No. 1203, 2002 WL 32154197, at *12 (E.D. Pa. Oct. 3, 2002) (awarding an interim fee after four years of litigation, noting that “to make them wait any longer for at least some award would be grossly unfair”).

A. The Court Should Again 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, 100 S. Ct. 745, 62 L. Ed. 2d 676 (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, 104 S. Ct. 1541, 79 L. Ed. 2d 891 (1984).

The Court has used the percentage-of-the-fund approach and counsel for the Auto Dealers request that the same method be applied to this group of settlements. 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; *In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *16; *In re Delphi*, 248 F.R.D. at 502; *In re 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.*, No. 2:12-CV-83, 2014 WL 2946459, at *1 (E.D. Tenn. June 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. *In re Cardizem Antitrust Litig.*, 218 F.R.D. at 532 (“the lodestar method is too cumbersome and time-consuming of the resources of the Court” and “more importantly, the ‘percentage of the fund’ approach more accurately reflects the result achieved.”); *see also Fournier v. PFS Inv., Inc.*, 997 F.Supp. 828, 831-32 (E.D. Mich. 1998) (the percentage of recovery method “allows for a more accurate approximation of a reasonable award of fees.”).

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.” *In re Cardizem Antitrust Litig.*, 218 F.R.D. 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.” *In re 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; on the cases included in these settlements, counsel for the Auto Dealers worked for more than six years and dedicated more than 119,000 hours of work from attorneys, paralegals, law clerks, and other processionalists.² Interim Co-Lead Counsel coordinated the efforts of counsel representing the Auto Dealers to maximize efficiency and to avoid duplicative efforts and unnecessary billing. (Raiter Decl.) They also monitored counsel to avoid unauthorized work and have been mindful of the Auto Dealers' role in this litigation and the potential recoveries for their clients. *Id.*

Counsel for the Auto Dealers request that the Court award fees totaling 30 percent of the settlement funds remaining after the deduction of: (1) notice and administration costs, and (2) costs set aside for future litigation expenses.³ Reasonable fee awards generally range from 20 to 50 percent of the common fund. *In re Telectronics Pacing Sys., Inc., Accufix Atrial "J" Leads Prods. Liab. Litig.*, 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 the Sixth Circuit routinely approve attorneys' fees in antitrust class actions of one-

² See Declarations of Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore.

³ 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 Sulzer Orthopedics, Inc.*, 398 F.3d 778, 780-82 (6th Cir. 2005) (affirming fee awards from a common benefit fund based on the gross settlement amount); *In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *17 ("The fee percentage is applied to the settlement fund before the separate award of litigation costs and expenses are deducted from the fund."); *In re Delphi*, 248 F.R.D. at 505 (attorneys' fees awarded on gross settlement fund); *In re Cardizem Antitrust Litig.*, 218 F.R.D. at 531-535 (awarding costs in addition to percentage of the fund fee).

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); *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); *Kogan v. AIMCO Fox Chase, L.P.*, 193 F.R.D. 496, 503 (E.D. Mich. 2000). For example, 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 Se. Milk Antitrust Litig.*, No. 2:07-CV 208, 2013 WL 2155387, at *8 (E.D. Tenn. May 17, 2013) (one-third fee from settlements totaling \$158.6 million and finding that 33 percent “is certainly within the range of fees often awarded in common fund cases both nationwide and in the Sixth Circuit”).⁴

⁴ 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.*, No. CIV.A. 08-MD-1912, 2014 WL 296954, at *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.*, No. 10-CV-00318 RDB, 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. 1:05-CV-01908-TWP, 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.*, No. 1:05-CV-00979-SEB, 2010 WL 3282591, at *3 (S.D. Ind. Aug. 17, 2010) (approving one-third fee); *Williams v. Sprint/United Mgmt. Co.*, No. CIV. 03-2200-JWL, 2007 WL 2694029, at *6 (D. Kan. Sept. 11, 2007) (awarding fees equal to 35 percent of \$57 million common fund); *Lewis v. Wal-Mart Stores, Inc.*, No. 02-CV-0944 CVE FHM, 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.”); *In re AremisSoft Corp., Sec., Litig.*, 210 F.R.D. 109, 134 (D.N.J. 2002) (“Scores of cases exist where fees were awarded in the one-third to

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 percent 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 percent); *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 percent).

Although the settlements benefitting the Auto Dealers are substantial, the Court should not apply a reduced fee percentage simply because the recoveries have grown. *See In re Se. Milk Antitrust Litig.*, 2013 WL 2155387 (stating that “the Court has not found any Sixth Circuit case endorsing [a reduced percentage] approach.”). Numerous courts have criticized the “mega fund” approach because it may provide an incentive for counsel to settle early and for less money. *See, e.g., In re Cendant Corp. Litig.*, 264 F.3d 201, 284 n. 55 (3d Cir. 2001) (“[The megafund] position. . . has been criticized by respected courts and commentators, who contend that such a fee scale often gives counsel an incentive to settle cases too early and too cheaply.”) (citation omitted); *Allapattab Services, Inc. v. Exxon Corp.*, 454 F. Supp. 2d 1185, 1213 (S.D. Fla. 2006) (“By not rewarding Class Counsel for the additional work necessary to achieve a better outcome for the class, the sliding scale approach creates the perverse incentive for Class Counsel to settle too early for too little.”); *In re TFT-LCD (Flat Panel) Antitrust Litig.*, No. 07-md-01827 SI, 2013 WL 1365900, at *8 (N.D. Cal. Apr. 3, 2013) (awarding 28.6 percent of \$1.082 billion settlement fund and expressly rejecting the suggestion that fees should be reduced based on the “mega fund” concept).

one-half of the settlement fund.”) (citations omitted); *Moore v. United States*, 63 Fed. Cl. 781, 787 (2005) (“one-third is a typical recovery”).

Many courts have awarded fees greater than 30 percent even for recoveries much larger than those made here by the Auto Dealers. *See, e.g., Allapattah*, 454 F. Supp. 2d at 1210-11 (awarding 31.5 percent of a \$1.06 billion settlement fund and citing fourteen cases involving settlement funds between \$40-\$696 million with fee awards between 25 percent and 35 percent of the fund); *In re Cathode Ray Tube Antitrust Litig.*, No. C-07-5944-JST, 2016 U.S. Dist. LEXIS 102408, at *56 (N.D. Cal. Aug. 3, 2016) (awarding 27.5 percent of \$576 million settlement fund); *In re IPO Secs. Litig.*, 671 F. Supp. 2d 467, 516 (S.D.N.Y. 2009) (awarding 33-1/3 percent of a \$510,253,000 settlement fund); *In re Checking Account Overdraft Litig.*, 830 F. Supp. 2d 1330, 1358 (S.D. Fla. 2011) (awarding 30 percent of \$410 million settlement fund); *In re Vitamins Antitrust Litig.*, 2001 U.S. Dist. LEXIS 25067, at *6 (awarding 34.06 percent of \$359 million settlement fund).

The 30 percent attorney fee award being sought is fair and reasonable in light of the work performed by counsel for the Auto Dealers, the results achieved, and the work undertaken. Since 2011, some of the attorneys for the Auto Dealers worked full-time on this litigation. As described earlier in this brief, counsel for the Auto Dealers have performed, and continue to perform, an enormous amount of work to achieve the settlements and to move these cases to conclusion. (Raiter Decl.)⁵

This litigation is much more complex than typical antitrust class actions. The DOJ describes its investigation of the bid-rigging and price-fixing conspiracies at issue here as the largest criminal cartel it has ever uncovered. The litigation involves at least 41 automotive component parts, many

⁵ In the Round One fee approval, the Court awarded counsel for the Auto Dealers one-third of the net settlement funds. *See* Order Regarding Auto Dealers' Motion for an Attorney of Attorneys' Fees, Reimbursement of Litigation Expenses, and Service Awards, No. 2:12-md-00102-MOB-MKM, ECF Doc. No. 401 (E.D. Mich. 2015). In the Round Two fee approval, the Court awarded 20 percent and reserved awarding an additional 10 percent that is being held escrow. *See* Order Regarding Auto Dealers' Motion for an Attorney of Attorneys' Fees, Reimbursement of Litigation Expenses, and a Set Aside for Future Litigation Expenses, No. 2:12-md-00102-MOB-MKM, ECF Doc. No. 188 (E.D. Mich. 2016).

hundreds of affected vehicle models, and more than 160 foreign and domestic Defendants. There are 41 separately filed Auto Dealer class cases within this MDL. The Auto Dealers asserted claims under federal and state antitrust, consumer protection, and unjust enrichment laws. As indirect purchasers, their claims for damages and restitution are based on the laws of approximately thirty states and the District of Columbia.

The Auto Dealers' position in the distribution chain made them targets of discovery for both their own claims and for the claims of the End Payors. The Auto Dealers' position as intermediate indirect purchaser creates complex liability, damage, and class certification issues. *In re Flat Panel Antitrust Litig.*, 2013 U.S. Dist. LEXIS 49885, at *70; *see also In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917, 2013 U.S. Dist. LEXIS 137945, at *65 (N.D. Cal. June 20, 2013) (recommending class certification for indirect purchasers and noting that the plaintiffs "still have the burden of demonstrating that there is a reasonable method for determining on a class-wide basis whether and to what extent that overcharge was passed on to each of the indirect purchasers at all levels of the distribution chain.") (internal quotation marks omitted); *In re Cardizem Antitrust Litig.*, 218 F.R.D. at 533 (granting indirect purchaser plaintiffs' motion for final approval and for attorneys' fees and noting that plaintiffs "also faced substantial additional difficulties as indirect purchasers.").

The Auto Dealers' role here caused them to carry a disproportionate share of the discovery burden of certain aspects of the indirect purchaser claims. Although the aggregate Auto Dealer settlement recoveries are substantial, they total about one-third of the amounts recovered by the End Payors. The Auto Dealers suggest that this disparity supports consideration by the Court of group-specific analyses of the proper percentage of the recovery for fee awards. When viewed in the context of the work done by counsel for the Auto Dealers and the settlements achieved, the 30 percent fee requested in this motion is fair and reasonable.

C. Consideration of the Factors Used by the Sixth Circuit Supports the Requested Fee Award.

When using the percentage-of-the-fund approach, the Court will consider the six *Ramey* factors: (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 confirm that the requested fee is fair.

1. Counsel Secured Valuable Benefits for Auto Dealers.

The result achieved for the class members is the principal consideration. *In re Delphi*, 248 F.R.D. at 503. As shown in the documents filed in support of the preliminary approval of the Round Three settlements, counsel for the Auto Dealers achieved excellent recoveries. These are cash settlements coupled with meaningful cooperation and, in many cases, injunctive relief against anti-competitive behavior. The settlement funds total more than \$115 million and represent a significant recovery for Auto Dealers that sell new vehicles in the indirect purchaser states.

After the deduction of fees, notice and claims administration costs, and expenses, all of the settlement funds will be paid to eligible dealerships that file a valid claim. 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 the settlements provide significant value to Auto Dealers in their prosecution of the claims against non-settling Defendants. With this third round of settlements, approximately \$298 million has been recovered to benefit members of the Auto Dealer settlement classes who are eligible to receive money benefits. The

monetary recovery alone is substantial but, when coupled with the cooperation and injunctive relief, the value of these Round Three settlements is considerable.

2. Society Has An Important Stake in 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 CD Antitrust Litig.*, 218 F.R.D. at 534 (internal quotation marks omitted); *see also Mitsubishi Motors Corp. v. Soler Chrysler-Plymouth, Inc.*, 473 U.S. 614, 653-54 (1985); *Alpine Pharmacy, Inc. v. Chas. Pfizer & Co.*, 481 F.2d 1045, 1050 (2d Cir.), *cert. denied*, 414 U.S. 1092 (1973); *Ramey*, 508 F.2d at 1196; *In re Delphi*, 248 F.R.D. at 504; *see also* Declaration of Arthur J. Miller, 2:12-md-02311-MOB-MKM, ECF Doc. No. 1398-1 (E.D. Mich. 2016); Declaration of Frank J. Kelley, 2:12-md-02311-MOB-MKM, ECF Doc. No. 1398-2 (E.D. Mich. 2016). Without the willingness of counsel to assume the risks inherent to these cases (or in other cases of similar magnitude and complexity) the settlement class members would not have recovered anything, let alone the substantial recoveries secured here.

The DOJ did not seek restitution from the settling Defendants. Any recovery for Auto Dealers needed to come through the effort of lawyers working on a contingent basis. The significant expenses, combined with the high degree of uncertainty of ultimate success, make contingent fees a virtual necessity for cases like these. The public interest is served by awarding

compensation in an amount appropriate to encourage skilled attorneys to assume the risks of this type of litigation.

The substantial recoveries counsel for the Auto Dealers have achieved help serve the public policy of holding those who violate antitrust laws in the United States accountable. Society benefits when those who have violated laws fostering fair competition and honest pricing are required to reimburse affected consumers in civil proceedings. *Vendo v. Lektro-Vend Corp.*, 433 U.S. 623, 635 (1977) (“Section 16 undoubtedly embodies congressional policy favoring private enforcement of the antitrust laws, and undoubtedly there exists a strong national interest in antitrust enforcement.”); *Wal-Mart Stores, Inc. v. Visa U.S.A., Inc.*, 396 F.3d 96, 122 (2d Cir. 2005) (concluding that it is “especially important to provide appropriate incentives to attorneys pursuing antitrust actions because public policy relies on private sector enforcement of the antitrust laws.”)

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 inherent 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.” *In re Cardinal Health Ins. Sec. Litig.*, 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). “This antitrust litigation, like all litigation of its species, promises to be extremely complex and time intensive and there is no question that if settlement fails, the Defendants will mount a strong defense.” *In re Packaged Ice*, 2011 WL 6209188, at *19.

The Sixth Circuit counsels that the specific characteristics of a class action case can govern the appropriateness of a fee award. *Rawlings*, 9 F.3d at 516 (finding that the district court can determine the appropriate method for calculating attorneys' fees in light of the "unique characteristics of class actions"). The legal and factual issues surrounding these cases are extremely complex. 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 strongly favors the fee requested. *In re Delphi*, 248 F.R.D. at 503-54.

4. 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 Antitrust Litig.*, 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).

Although any antitrust action is complex, the scale of this litigation magnifies that complexity. 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. This factor also supports the fee requested. Defendants focused their discovery efforts on the Auto Dealers and the Court is acquainted with much of the work done by counsel for the Auto Dealers. Responding to Defendants' nearly constant fusillade of discovery required the Auto Dealers and their attorneys to devote an enormous amount of time and resources. Defendants conducted 140 depositions of non-party and class representative Auto Dealers. The calculation of the indirect purchaser damages and the preparation of the expert opinions necessary to calculate and present those damages are extremely complicated.

5. 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 6209188, at *19. The Court has found that Interim Co-Lead Counsel 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. Defense counsel here are also extremely well-qualified and experienced antitrust and class action firms. The Court has seen first-hand the skill of the attorneys and the quality of the work done to represent their respective clients. This factor supports the fee being requested by counsel for the Auto Dealers.

6. A Lodestar Cross-check 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. *In re Cardinal Health Ins. Sec. Litig.*, 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. *In re Cardinal Health Ins. Litig.*, 528 F. Supp. 2d at 767. The cross-check does not require mathematical precision and it allows the Court to rely on summaries submitted by the attorneys and not review actual billing records. *In re Prudential Ins. Co. of America Sales Prac. Litig.*, 148 F.3d 283, 342 (3d Cir. 1998). Here, however, 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). In multi-district cases involving multiple cases and defendants, the courts consider requests for attorneys' fees from partial settlements by looking at all of the work done on those cases to-date. *See, e.g., In re Air Cargo Shipping Servs. Antitrust Litig.*, 2015 WL 5918273 (granting fees from settlements with multiple defendants based on an analysis of all of the work done on the cases); *In re Processed Eggs Prods. Antitrust Litig.*, No. 08-md-2002, 2012 U.S. Dist. LEXIS 160764, at *18 (E.D. Pa. Nov. 9, 2012) (granting motion for attorneys' fees from settlement with single defendant based upon all work on case to-date).

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. An enormous amount of work has been done. Discovery has been extensive and Defendants were relentless in their pursuit of discovery and motion practice 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 non-settling Defendants. All the while, counsel for the Auto Dealers have been preparing to certify classes and bring any remaining cases to trial.

Counsel for the Auto Dealers have vigorously prosecuted these case but have done so efficiently and without unnecessary duplication. To calculate a lodestar for this optional cross-check, Auto Dealer attorneys and their firms provided declarations that set forth the timekeepers, customary rates, and hours worked to advance the litigation for the Auto Dealers. As shown in those declarations, counsel representing the Auto Dealers and their professional staff have worked more than 119,000 hours in the cases involved in the Round Three settlements (up to July 1, 2018). (*See* Declarations of Don Barrett, Jonathan Cuneo, Shawn Raiter, Gerard Mantese, Dewitt Lovelace,

Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore).⁶ The total lodestar is \$70,237,227.70. (Raider Decl.)

Using the cumulative hours worked for the parts cases included in the Round Three settlements recognizes that the work previously done by counsel for the Auto Dealers applied to and assisted the cases currently before the Court. This Court, and others, has concluded that it is appropriate to count the cumulative lodestar in a cross-check. *See In re Se. Milk Antitrust Litig.*, 2013 U.S. Dist. LEXIS 70167, at *26-27; *Lobatz v. U.S. West Cellular of California, Inc.*, 222 F.3d 1142 (9th Cir. 2000); *see also* 2:12-cv-00103-MOB-MKM, ECF Doc. No. 578, fn. 2 (E.D. Mich. 2017).

The Auto Dealers' lodestar is conservative because it does not include the time spent prosecuting these cases since July 1, 2018 or the time that will continue to be needed to bring the cases to a conclusion. While the hours already worked are substantial, they are reasonable and reflect the challenging nature of the litigation. Defendants are represented by extremely capable counsel who have asserted vigorous defenses. Defendants' efforts have required the Auto Dealers to expend considerable effort and skill in prosecuting these cases.

As the starting point for the lodestar cross-check, the hourly rates of Auto Dealer counsel are reasonable for attorneys with specialized experience in bringing antitrust cases. "A reasonable hourly rate is determined according to the prevailing market rates in the relevant community. To ascertain that community, district courts 'are free to look to a national market, an area of specialization market, or any other market they believe appropriate to fairly compensate particular attorneys in individual cases.'" *Ford v. Fed.-Mogul Corp.*, No. 2:09-cv-14448, 2015 U.S. Dist. LEXIS 3399, at *2-3 (E.D. Mich. Jan. 7, 2015) (quoting *McHugh v. Olympia Entm't, Inc.*, 37 F. App'x 730, 740 (6th Cir. 2002)). Even if counsel's "requested rates are high for this district. . . Class Counsel should

⁶ Counsel have provided declarations and summaries of the time spent on this litigation. Unlike the lodestar-based fee request in *Shane Grp., Inc. v. Blue Cross Blue Shield of Michigan*, 825 F.3d 299 (6th Cir. 2016), the cross-check used in a percentage-of-the-fund request may be based on summaries of time spent by counsel. *Cardinal*, 528 F. Supp. 2d at 767; *In re Prudential*, 148 F.3d at 342.

be compensated at rates that reflect their skill and their success." *Schumacher v. AK Steel Corp. Ret. Accumulation Pension Plan*, 995 F. Supp. 2d 835, 847 (S.D. Ohio 2014).

The Auto Dealer counsel charging the highest hourly rates are well within the parameters of reasonableness. In national markets, "partners routinely charge between \$1,200 and \$1,300 an hour, with top rates at several large law firms exceeding \$1,400.⁷ In specialties such as "antitrust and high-stakes litigation and appeals . . . [f]or lawyers at the very top of those fields, hourly rates can hit \$1,800 or even \$1,950." *Id.* Some "difference makers" in the most complex fields, including antitrust litigation, even charge \$2,000 an hour.⁸ This Court has recognized that rates charged by End Payor and Direct Purchaser counsel in this matter, which in some cases significantly exceed those being charged by counsel for the Auto Dealers, "are well in line with the market, with recent reports explaining that senior lawyers at top law firms routinely charge well over \$1,000." *See, e.g.*, 2:12-cv-00103-MOB-MKM (Doc. No. 578) at 7.⁹

The requested fee is \$33,626,155, which represents 30 percent of the Round Three settlement funds after notice and administration and future litigation expenses have deducted.¹⁰ The

⁷ *See* Sara Randazzo & Jacqueline Palank, *Legal Fees Cross New Mark: \$1,500 an Hour*, The Wall Street Journal (Feb. 16, 2016), <https://www.wsj.com/articles/legal-fees-reach-new-pinnacle-1-500-an-hour-1454960708>; *see also* Martha Neil, *Top partner billing rates at BigLaw firms approach \$1,500 per hour*, ABA Journal (Feb. 8, 2016), http://www.abajournal.com/news/article/toppartner_billing_rates_at_biglaw_firms_nudge_1500_per_hour.

⁸ *See* Natalie Rodriguez, *Meet the \$2,000 An Hour Attorney: What it Takes to Earn Top Dollar in the Rate-Crunch Era*, Law360, June 11, 2016, <https://www.law360.com/in-depth/articles/804421> ("[E]arlier this year, BTI Consulting Group found that a handful of in-house counsel had paid as much as \$2,000 per hour, after discounts, to attorneys in the past year. Several other in-house counsel, meanwhile, had paid highs of \$1,900 per hour or \$1,800 per hour.")

⁹ 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). This approach has been approved by the Sixth Circuit Court of Appeals and has been used in the fee awards made in this MDL. *See* 2:12-cv-00103-MOB-MKM, ECF Doc. No. 578, para. 18 (E.D. Mich. 2017).

¹⁰ The calculation is: \$112,087,184 X .30 = \$33,626,155.

Court previously awarded counsel for the Auto Dealers attorneys' fees of \$43,446,364 for the initial two groups of Auto Dealer settlements. Adding that award to the fees sought here results in a total award of \$77,072,519. Using that fee award total, and comparing it to the total lodestar for the work done on the cases in the first two rounds of Auto Dealer settlements results in a multiplier of time spent to-date on these cases of 1.09 of the lodestar.¹¹

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 "multiplier" of 1.09 of the lodestar. This multiplier is reasonable and much lower than the multipliers approved in other cases. *See, e.g., In re Cardinal Health Ins. Sec. Litig.*, 528 F. Supp. 2d at 767-68 (approving multiplier of 6, and observing that "[m]ost courts agree that the typical lodestar multiplier" on a large class action "ranges from 1.3 to 4.5"); *In re Prandin Direct Purchase Antitrust Litig.*, 2015 WL 1396473, at *4 (3.01 multiplier); see also Order Granting Interim Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Costs and Expenses, No. 2:12-cv-00601-MOB-MKM, ECF Doc. No. 128, para. 19 (awarding direct purchaser fees of 2.09 times the lodestar) (E.D. Mich. 2015); Order granting Direct Purchaser's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Costs and Expenses, No. 2:17-cv-04201-MOB-MKM, ECF Doc. No. 21 (awarding direct purchaser fees of 1.79 times the lodestar) (E.D. Mich. 2018).

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. With no guarantee about the extent of work required to conclude these cases or the fees that will be generated from that work, it is possible that the slightly positive multiplier on the current lodestar will be eroded.

¹¹ The calculation is $\$77,072,519 \div \$70,237,227 = 1.09$.

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, and allow the creation of a future litigation fund.

Dated: August 1, 2018

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CERTIFICATE OF SERVICE

I, Gerard V. Mantese, hereby certify that I caused a true and correct copy of **AUTO DEALERS' MEMORANDUM IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES AND SET ASIDE FOR FUTURE LITIGATION EXPENSES FROM ROUND THREE SETTLEMENTS** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on August 1, 2018

s/ Gerard V. Mantese
Gerard V. Mantese

Automobile Dealership Plaintiff's Proposed Expense Award				
Settling Defendant	Automotive Parts Case	Settlement Amount	Pro Rata Share of (Estimated) Notice and Claim Administration Costs	Future Litigation Fund Contribution
Aisin	Fuel Injection Systems	\$1,440,000.00	\$4,375.75	\$43,192.80
Aisin Seiki	Valve Timing Control Devices	\$5,880,000.00	\$17,867.56	\$176,572.17
Alps	Heater Control Panels	\$1,020,000.00	\$3,099.47	\$30,753.27
Bosch	Windshield Wiper System(s)	\$160,512.00	\$487.75	\$4,837.59
	Starters	\$328,416.00	\$997.96	\$9,675.19
	Fuel Injection System(s)	\$913,440.00	\$2,775.67	\$27,297.85
	Spark Plug(s) / Standard Oxygen Sensor(s) / Air Fuel Ratio Sensor(s)	\$9,157,632.00	\$27,827.30	\$274,706.21
Bridgestone	Anti-Vibration Rubber Parts	\$9,360,000.00	\$28,442.23	\$280,925.97
Chiyoda	Automotive Wire Harness Systems	\$604,800.00	\$1,837.81	\$17,968.20
Diamond Electric	Ignition Coil(s)	\$1,704,000.00	\$5,177.94	\$51,140.28
Eberspächer	Exhaust System(s)	\$432,000.00	\$1,312.72	\$13,130.61
G.S. Electech	Automotive Wire Harness System(s)	\$960,000.00	\$2,917.15	\$28,680.02
Hitachi	Automotive Brake Hoses	\$360,000.00	\$1,093.93	\$10,711.81
HIAMS	Shock Absorbers	\$4,200,000.00	\$12,762.54	\$126,122.98
INOAC	Interior Trim(s)	\$780,000.00	\$2,370.19	\$23,496.88
JTEKT	Automotive Bearings	\$13,711,206.00	\$41,664.24	\$411,195.46
	Electronic Powered Steering Assemblies	\$1,288,794.00	\$3,916.26	\$38,700.75
Kiekert	Side-Door Latches / Latch Minimodules	\$720,000.00	\$2,187.86	\$21,769.17
Koito	Automotive Lamps	\$6,838,194.00	\$20,779.22	\$205,252.19
	HID Ballasts	\$421,806.00	\$1,281.74	\$12,785.07
Mitsuba	Windshield Wiper System(s)	\$10,387,939.70	\$31,565.83	\$311,679.24

	Radiator(s)	\$1,157,185.93	\$3,516.34	\$34,554.24
	Starter(s)	\$2,986,532.66	\$9,075.17	\$89,495.48
	Automotive Lamp(s)	\$76,381.91	\$232.10	\$2,418.80
	Electric Powered Steering Assembly(ies)	\$53,467.34	\$162.47	\$1,727.71
	Fan Motor(s)	\$1,157,185.93	\$3,516.34	\$34,554.24
	Fuel Injection System(s)	\$435,376.88	\$1,322.98	\$13,130.61
	Power Window Motor(s)	\$6,057,085.43	\$18,405.66	\$181,755.30
	Windshield Washer System(s)	\$488,844.22	\$1,485.45	\$14,512.78
NGK	Ceramic Substrates	\$3,840,000.00	\$11,668.61	\$115,065.62
NTN	Bearings	\$2,076,000.00	\$6,308.34	\$62,197.63
NRC	Body Sealing(s)	\$11,880,000.00	\$36,099.76	\$356,254.21
Tokai Rika	Automotive Wire Harness System(s)	\$240,000.00	\$729.29	\$6,910.85
Toyo	Anti-Vibrational Rubber Parts	\$10,845,255.47	\$32,955.48	\$325,500.94
	Automotive Constant-Velocity-Joint Boot Products	\$554,744.53	\$1,685.70	\$16,586.04
Yamada	Electronic Powered Steering Assemblies	\$744,000.00	\$2,260.79	\$22,460.26
Yamashita	Anti-Vibration Rubber Parts	\$1,920,000.00	\$5,834.30	\$57,705.58
	TOTAL	\$115,180,799.90		\$3,455,424.00

**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	:	2:12-cv-00102
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
ANTI-VIBRATION RUBBER PARTS	:	2:13-cv-00802
WINDSHIELD WIPERS	:	2:13-cv-00902
RADIATORS	:	2:13-cv-01002
STARTERS	:	2:13-cv-01102
AUTOMOTIVE LAMPS	:	2:12-cv-01202
IGNITION COILS	:	2:13-cv-01402
HID BALLASTS	:	2:12-cv-01702
ELECTRONIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FAN MOTORS	:	2:13-cv-02102
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
POWER WINDOW MOTORS	:	2:13-cv-02302
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
WINDSHIELD WASHERS	:	2:13-cv-02802
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
MINIMODULES	:	2:17-cv-04302
SIDE DOOR LATCHES	:	2:17-cv-13005

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

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

I, Shawn M. Raiter, declare as follows:

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

2. The Round One payments (not including the amount held in reserve pursuant to the allocation plans) have been made to eligible Auto Dealers who submitted valid claims. Some Round One settlement payments to class members exceeded \$1 million, the highest being more than \$3 million. The Round Two settlement payments are expected to be paid in August 2018 and, because of the settlement funds available, should be approximately two times the amount of the Round One payments for a similarly-situated class member.

3. The total money recovered in Auto Dealer settlements in Round One (\$58,947,900.00), Round Two (\$124,730,927.00), and Round Three (\$115,180,799.90) is \$298,859,626.00. Counsel for the Auto Dealers have presented additional settlements for preliminary approval and continue to negotiate and finalize new agreements with Defendants who have not yet settled. These settlements will be presented to the Court as Round Four Auto Dealer settlements.

4. As of July 31, 2018, the Round Three settlement funds had earned interest totaling \$847,659.26 and had paid taxes and tax preparation fees of \$135,850 for a net gain of \$711,809.26.

5. The firms representing the Auto Dealers have worked on this litigation on a contingent basis. My law firm, and the law firms representing the Auto Dealers under the direction of Interim Co-Lead Counsel for the Auto Dealers, have done so without any guarantee of being

paid for their time or being reimbursed for the considerable expenses and time devoted in the pursuit of the cases involved in the settlements currently before the Court.

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

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

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

- Drafting, preparing for, and arguing numerous oppositions to motions to dismiss;
- Drafting and opposing numerous discovery motions, motions to quash, and other discovery sought by the Defendants from the Auto Dealers;
- Negotiating dealership and discovery issues with defense counsel including innumerable meet-and-confer sessions, each of which required substantial preparation;
- Preparing correspondence with respect to timing, stipulations, and case planning issues;
- Corresponding and attending calls with dealership co-counsel regarding client discovery and trial preparation issues;
- Obtaining and analyzing documents and data from over 40 class representative dealerships, including many in-person trips to the dealerships;
- Locating, review, redaction, and production of nearly 1 million pages of documents from class representative dealerships;
- Exchanging information and coordinating with end-payor, direct purchaser, truck and equipment dealers, City of Richmond, California, Florida, and Ford counsel regarding various issues;
- Attending calls and meetings to help formulate 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;
- Exchanging information and conferring with counsel for the other Plaintiff groups regarding various discovery, procedural, and substantive issues;
- Attending MDL status conferences and motions with Judge Battani and conferences and motions with the discovery Special Master;
- Preparing for, traveling to, and attending more than 140 depositions of third-party automobile dealerships and class representative dealerships;
- Preparing for, traveling to, and attending more than 190 depositions of Defendants and their representatives;

- Preparing, through Japanese-speaking attorneys, key deposition outlines and strategy used by all Plaintiffs' groups in this litigation;
- Preparing for class certification motions by analyzing thousands of pages of depositions, thousands of pages of key discovery, working with experts, analyzing relevant case law, and drafting pleadings;
- Performing all the tasks necessary to reach more than 60 settlements, including formulating demands, negotiating, in some cases mediation, dozens of in-person meetings, exchange of drafts, preparing escrow agreements;
- Drafting settlement agreements, preliminary approval motions, and in some cases attend and argue preliminary approval motions;
- Analyzing discovery and materials received from cooperating Defendants and working with the special allocation consultant to develop allocation plans for each of the dozens of parts for which Auto Dealer settlements have been reached;
- Receiving cooperation materials from settling Defendants, attend in-person proffers from settling Defendants who disclose the details of the conspiracies, and review and analyze cooperation materials from settling Defendants and incorporate that information into the ongoing case strategy; and
- Drafting notices, claim forms, and other settlement-related documents and consult with the special allocation consultant and claims administrator

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

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

salesperson training materials over the course of fourteen years. Defendants sought documents and data located on any computer, database, or back-up tape anywhere in the dealerships, as well as hard copy documents located all over the dealerships. Counsel for the Auto Dealer had to negotiate these demands with Defendants and brought and opposed numerous discovery motions.

10. Defendants also sought documents and other electronic data from the automobile dealership class representatives, including: (1) tens of thousands of invoices documenting new car purchases; (2) hundreds of fields of dealership management system (DMS) data; (3) data from back-up media going back to 1999; (4) monthly 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.

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

12. The Court has before it settlements totaling more than \$115 million for the benefit of eligible Auto Dealers. The settlements were reached after years of litigation and the settlements were negotiated by experienced counsel on both sides. The settlements were reached through lengthy negotiations of the parties, some of which took many months and involved many communications and numerous rounds of negotiation. When necessary, the parties engaged one of

the Court-appointed mediators or a third-party neutral. Some of the Round Three settlements were only reached after multiple mediation sessions. In each settlement before the Court, counsel on both sides was armed with transactional data, documents produced in discovery, and a strong understanding of the claims and defenses. Counsel for the Auto Dealers also had the benefit of cooperation materials provided by settling Defendants or amnesty applicants.

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

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

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

the Auto Dealers monitored the work of the firms working for the Auto Dealers to ensure efficiency and to avoid unauthorized and unnecessary work.

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

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

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

19. Interim Co-Lead Counsel for the Auto Dealers and the firms working under their direction have invested substantial time on this litigation that they could have spent working on other matters. They have invested this time for four years and have not been paid for their work.

20. Counsel for the Auto Dealers have also invested approximately **\$358,125.09** of their own money to pay for unreimbursed 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 nearly 1 million pages of dealer documents,

travel, extensive translations, and other reasonable litigation expenses. Counsel for the Auto Dealers incurred these expenses in these cases without any guarantee of recovery and should be reimbursed from the settlement funds.

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

22. The size and complexity of this litigation requires the expenditure of significant expenses for domestic and international travel, scanning and preparation of documents for database entry, document review and database hosting of those documents, translation of foreign language documents, the retention of Japanese speaking counsel, and extensive economic expert analysis. As the remaining cases progress to class certification, the expert and other expenses are expected to increase dramatically. In particular, experts in anti-trust cases typically create economic and damage models that describe the mechanisms and impact of the anti-competitive behavior at issue. In this litigation, counsel for the Auto Dealers expect that the cost of their experts' work will be millions of dollars. In addition, ongoing expenses related to the processing and hosting of millions of pages of documents is a significant expense, for which the Auto Dealers' share alone totals tens of thousands of dollars each month.

23. Interim Co-Lead Counsel for the Auto Dealers request that the Court authorize them to set aside three percent of the Round Three settlement proceeds (\$3,455,423.97) 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.

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

25. As set forth in the declarations of Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore, counsel for the Auto Dealers have advanced **\$358,125.09** in unreimbursed litigation costs in the cases in the Round Three settlements currently before the Court. *See* Declaration of Marie Thomas. These are reasonable litigation costs that were incurred in the cases involving parts for which there were no prior settlements and therefore no future litigation funds set aside from prior settlements.

26. As set forth in the declarations of Jonathan Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore, counsel for the Auto Dealers have worked for nearly seven years and have worked 119,553.77 attorney, paralegal, and professional hours in the cases with settlements currently before the Court. Applying the rates customarily charged by those counsel to the hours expended yields a “lodestar” of \$70,237,227.70 through July 1, 2018.

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

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

$$(\$115,892,608.00 - \$3,455,423.97 - \$350,000.00) \times .30 = \$33,626,155.00$$

29. The Court previously awarded \$18,500,168 in Round One fees to counsel for the Auto Dealers. The Court previously awarded \$24,946,196 in Round Two fees to counsel for the Auto Dealers. When added together, the fees awarded to counsel for the Auto Dealers in the first two settlement groups totaled \$43,446,364.

30. The **\$33,626,155.00** fee award Interim Co-Lead Counsel for the Auto Dealers respectfully requests, when coupled with the Court's prior fee award, represents a 1.09 multiplier of the the current lodestar, using counsel's current customary rates, 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 1st day of August, 2018 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
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PRODUCT(S):

AUTOMOTIVE WIRE HARNESSSES	:	2:12-cv-00102
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
ANTI-VIBRATION RUBBER PARTS	:	2:13-cv-00802
WINDSHIELD WIPERS	:	2:13-cv-00902
RADIATORS	:	2:13-cv-01002
STARTERS	:	2:13-cv-01102
AUTOMOTIVE LAMPS	:	2:12-cv-01202
IGNITION COILS	:	2:13-cv-01402
HID BALLASTS	:	2:12-cv-01702
ELECTRONIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FAN MOTORS	:	2:13-cv-02102
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
POWER WINDOW MOTORS	:	2:13-cv-02302
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
WINDSHIELD WASHERS	:	2:13-cv-02802
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
MINIMODULES	:	2:17-cv-04302
SIDE DOOR LATCHES	:	2:17-cv-13005

This Document Relates to:	:	Hon. Marianne O. Battani
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ALL DEALERSHIP ACTIONS	:	
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**DECLARATION OF MARIE THOMAS IN SUPPORT OF AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FOR ROUND THREE SETTLEMENTS**

I, Marie Thomas, declare as follows:

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

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

3. The beginning balance of this litigation fund on August 30, 2016 was \$810,616.82. In addition to that balance, \$608,200.50 has been collected from counsel for the Auto Dealers through assessments. From September 1, 2016 until June 30, 2018, \$358,125.09 has been spent and paid by the litigation fund for common expenses in connection with the Actions and has not been reimbursed through a prior award of the Court. All of such expense payments were reasonable and necessary for the prosecution of the Actions.

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

5. Attached as Exhibit B is an itemization of the amount totaling \$10,096.99 for the expenses reimbursed quarterly of Co-Counsel from the litigation fund.

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

Executed this 15th day of August, 2018.

Marie Thomas

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

STATE OF MISSISSIPPI
COUNTY OF Holmes

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS THE 15th DAY OF AUGUST, 2018.

Mary Anne Alexander
NOTARY PUBLIC, State of Mississippi

My Commission Expires: 06/14/2019



EXHIBIT A**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION****UNREIMBURSED EXPENSES PAID BY THE AUTO DEALERS' LITIGATION FUND****Reporting Period: September 01, 2016 to June 30, 2018**

EXPENSE	AMOUNT
Mediation	\$92,619.15
Postage Charges	
Translations	\$12,108.22
Long Distance	
Expense reimbursement quarterly of Co-Counsel	\$10,096.99
Experts	
Travel (Transportation, lodging, meals, etc.)depositions	\$42,728.77
Filing Fees	\$9,187.50
Professional Fees (expert/investigators, etc.)	\$6,068.80
Document Hosting	
Court Reporter/Transcripts	\$14,038.66
Document Production/Scanning	\$171,277.00
Miscellaneous (Describe)	
TOTAL	\$ 358,125.09

EXHIBIT B

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

Reporting Period: September 01, 2016 to June 30, 2018

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

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

BankPlus
210 E Broadway
Yazoo City, MS 39194-4547
662-746-0654

7504

DATE 10/5/2017

85-194 / 653

PAY TO THE
ORDER OF Lovelace and Associates, PA

\$ **10,096.99
DOLLARS

Ten Thousand Ninety-Six and 99/100*****

Lovelace and Associates, PA
12870 US Hwy 98 West, Ste 200
Miramar Beach, FL 32550

MEMO Auto

Marie Thomas

⑈ 7504 ⑈

Don Barrett, P.A.

7504

Lovelace and Associates, PA
215 · Trust Account Liability

Auto - 2nd Quarter 2017 expenses

10/5/2017

10,096.99

?

BankPlus Trust/IOLTA Auto

10,096.99

Don Barrett, P.A.

7504

Lovelace and Associates, PA
215 · Trust Account Liability

Auto - 2nd Quarter 2017 expenses

10/5/2017

10,096.99

BankPlus Trust/IOLTA Auto

10,096.99

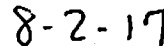
AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES**x WIRE HARNESS****FIRM NAME:** Lovelace and Associates, P.A.**Quarter Beginning:** April 2017**Courter Ending:** June 2017

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	2,913.81
Train Fare	-
Cabs	-
Other Local Transportation	369.09
Travel - Meals	1,420.51
Travel - Hotel	3,661.91
Federal Express, Local Courier, etc.	-
Postage	-
Facsimile Charges	-
Long Distance	614.50
In-House Photocopying	270.25
Outside Photocopying	-
Court Fees (filing, etc.)	-
Professional Fees (Document Review Temps)	-
Witness/Service Fees	-
Court Reporter/Transcripts	-
Computer Research	797.00
Miscellaneous (Describe)	49.92
	-
CURRENT TOTAL	10,096.99

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.



Signed: Dewitt M. Lovelace



Date:

**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	:	2:12-cv-00102
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
ANTI-VIBRATION RUBBER PARTS	:	2:13-cv-00802
WINDSHIELD WIPERS	:	2:13-cv-00902
RADIATORS	:	2:13-cv-01002
STARTERS	:	2:13-cv-01102
AUTOMOTIVE LAMPS	:	2:12-cv-01202
IGNITION COILS	:	2:13-cv-01402
HID BALLASTS	:	2:12-cv-01702
ELECTRONIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FAN MOTORS	:	2:13-cv-02102
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
POWER WINDOW MOTORS	:	2:13-cv-02302
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
WINDSHIELD WASHERS	:	2:13-cv-02802
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
MINIMODULES	:	2:17-cv-04302
SIDE DOOR LATCHES	:	2:17-cv-13005
	:	
This Document Relates to:	:	Hon. Marianne O. Battani
	:	
ALL DEALERSHIP ACTIONS	:	

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

I, Marie Thomas, declare as follows:

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

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

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

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

5. Attached as Exhibit A is an itemization of the expenditures of the Round One Court-Restricted Fund from inception to June 30, 2018.

6. Attached as Exhibit B is an itemization for the period of September 1, 2016 to June 30, 2018, totaling \$8,683.94. This amount reflects expenses reimbursed to Auto Dealer Counsel

from the Round One Court-Restricted Fund. Of the total expenses accrued since inception in the amount of \$494,273.19 (see Exhibit A), \$8,683.94 of those expenses have not been reimbursed.

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

Executed this 15th day of August, 2018.

Marie Thomas

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

STATE OF MISSISSIPPI
COUNTY OF Holmes

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS THE 15th DAY OF
AUGUST, 2018.

Mary Anne Alexander
NOTARY PUBLIC, State of Mississippi

My Commission Expires: 06/14/2019



EXHIBIT A

**IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION
EXPENSES PAID BY THE AUTO DEALERS' ROUND ONE COURT-RESTRICTED
LITIGATION FUND**

Reporting Period: Inception – June 30, 2018

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

EXHIBIT B

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

Reporting Period: September 1, 2016 to June 30, 2018

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

Don Barrett, P.A. Trust Account P O Box 927 Lexington, MS 39095 662-834-2488	Bankplus 210 E Broadway Yazoo City, MS 39194-4547 662-746-0654	7612
85-194 / 653		DATE 3/29/2018
PAY TO THE ORDER OF Lovelace and Associates, PA		\$ **8,683.94
Eight Thousand Six Hundred Eighty-Three and 94/100*****		DOLLARS
Lovelace and Associates, PA 12870 US Hwy 98 West, Ste 200 Miramar Beach, FL 32550		
MEMO	<i>Mari Thomas</i>	
⑈ 7 6 1 2 ⑈		

Don Barrett, P.A.

Lovelace and Associates, PA
215 · Trust Account Liability

Auto - 3rd Quarter 2017 expenses -- Ct #1

3/29/2018

7612

8,683.94

BankPlus Trust/IOLTA

8,683.94

Don Barrett, P.A.

Lovelace and Associates, PA
215 · Trust Account Liability

Auto - 3rd Quarter 2017 expenses -- Ct #1

3/29/2018

7612

8,683.94

BankPlus Trust/IOLTA

8,683.94

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

x WIRE HARNESS

FIRM NAME: Lovelace and Associates, P.A.

Quarter Beginning: July 2017

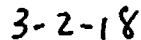
Courter Ending: September 2017

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	2,892.50
Train Fare	-
Cabs	-
Other Local Transportation	558.96
Travel - Meals	1,340.42
Travel - Hotel	3,138.78
Federal Express, Local Courier, etc.	29.78
Postage	-
Facsimile Charges	-
Long Distance	449.70
In-House Photocopying	138.25
Outside Photocopying	-
Court Fees (filing, etc.)	-
Professional Fees (Document Review Temps)	-
Witness/Service Fees	-
Court Reporter/Transcripts	-
Computer Research	-
Miscellaneous (Describe)	135.55
	-
CURRENT TOTAL	8,683.94

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.



Signed: Dewitt M. Lovelace



Date:

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

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	Master File No. 12-md-02311
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PRODUCT(S):

AUTOMOTIVE WIRE HARNESSSES	:	2:12-cv-00102
HEATER CONTROL PANELS	:	2:12-cv-00402
BEARINGS	:	2:12-cv-00502
ANTI-VIBRATION RUBBER PARTS	:	2:13-cv-00802
WINDSHIELD WIPERS	:	2:13-cv-00902
RADIATORS	:	2:13-cv-01002
STARTERS	:	2:13-cv-01102
AUTOMOTIVE LAMPS	:	2:12-cv-01202
IGNITION COILS	:	2:13-cv-01402
HID BALLASTS	:	2:12-cv-01702
ELECTRONIC POWERED STEERING ASSEMBLIES	:	2:13-cv-01902
FAN MOTORS	:	2:13-cv-02102
FUEL INJECTION SYSTEMS	:	2:13-cv-02202
POWER WINDOW MOTORS	:	2:13-cv-02302
VALVE TIMING CONTROL DEVICES	:	2:13-cv-02502
WINDSHIELD WASHERS	:	2:13-cv-02802
CONSTANT VELOCITY JOINT BOOT PRODUCTS	:	2:14-cv-02902
SPARK PLUGS	:	2:15-cv-03002
SHOCK ABSORBERS	:	2:16-cv-03302
BODY SEALING PRODUCTS	:	2:16-cv-03402
INTERIOR TRIM	:	2:16-cv-03502
BRAKE HOSES	:	2:16-cv-03602
EXHAUST SYSTEMS	:	2:16-cv-03702
CERAMIC SUBSTRATES	:	2:16-cv-03802
MINIMODULES	:	2:17-cv-04302
SIDE DOOR LATCHES	:	2:17-cv-13005

This Document Relates to:	:	Hon. Marianne O. Battani
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ALL DEALERSHIP ACTIONS	:	
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**DECLARATION OF MARIE THOMAS IN SUPPORT OF AUTO DEALERS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND SET ASIDE
FOR FUTURE LITIGATION EXPENSES FOR ROUND THREE SETTLEMENTS**

I, Marie Thomas, declare as follows:

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

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

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

4. From the original amount of \$9,978,474.16, a total of \$1,417,438.99 has been expended from the Round Two Court-Restricted Fund in accordance with the directions of the Court in its Order of December 2, 2016, and a total of and a total of \$8,561,035.17 remains in this fund. All of such expenditures were reasonable and necessary for the prosecution of the cases at issue in the Round Two settlements.

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

6. Attached as Exhibit B is an itemization of the amount totaling \$236,771.53 for the expenses reimbursed to Auto Dealer counsel from the Round Two Court-Restricted Fund.

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

Executed this 15th day of August, 2018.

Marie Thomas

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

STATE OF MISSISSIPPI
COUNTY OF Holmes

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS THE 15th DAY OF
AUGUST, 2018.

Mary Anne Alexander
NOTARY PUBLIC, State of Mississippi

My Commission Expires: 06/14/2019



EXHIBIT A

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

**EXPENSES PAID BY THE AUTO DEALERS'
ROUND TWO COURT-RESTRICTED FUND**

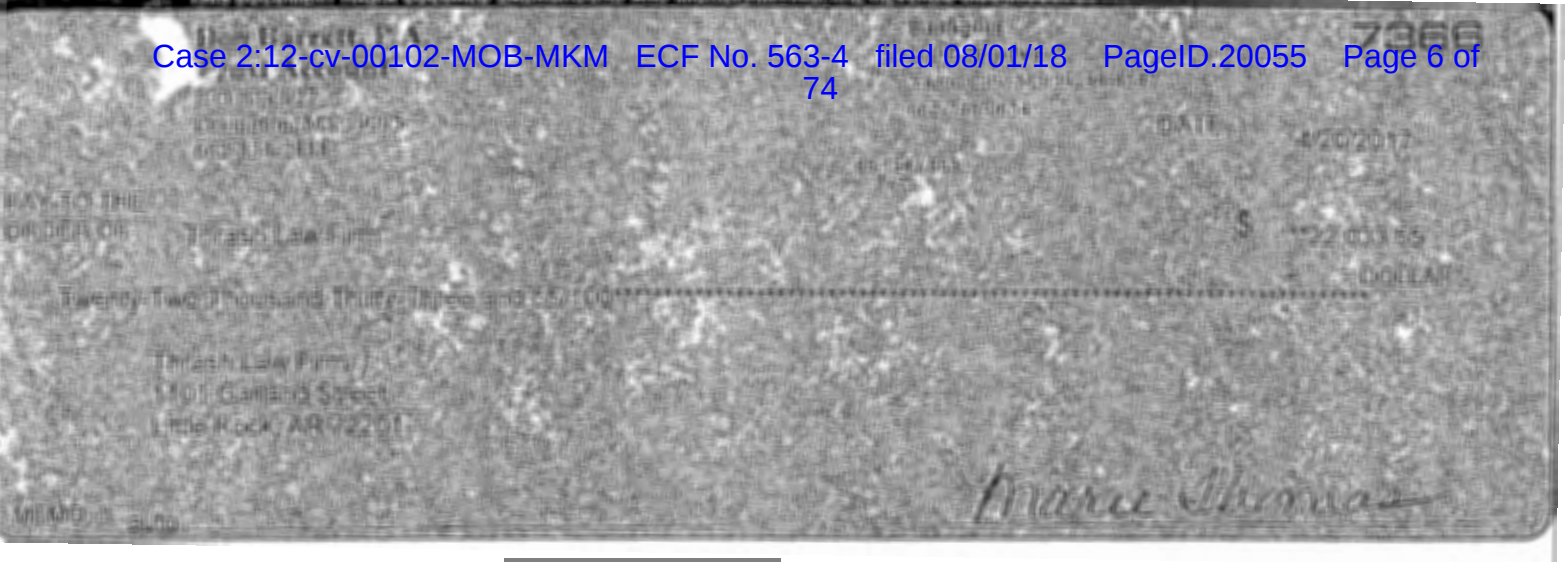
Reporting Period: Inception – June 30, 2018

EXPENSE	AMOUNT
Mediation	\$277,238.40
Postage Charges	
Translations	\$38,489.40
Long Distance	
Expense reimbursement of Co-Counsel	\$236,771.53
Experts	
Travel (Transportation, lodging, meals, etc.)depositions	\$45,042.17
Purchase Price of Dataset	
Professional Fees (expert/investigators, etc.)	\$234,851.50
Document Hosting	\$326,842.43
Court Reporter/Transcripts	\$72,355.08
Document Production/Scanning	\$32,970.00
Miscellaneous (Describe)	
TOTAL	\$ 1,417,438.99

EXHIBIT B

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

Reporting Period: Inception to June 30, 2018



⑈ 7366 ⑈

Don Barrett, P.A.

7366

Thrash Law Firm	4/20/2017	
215 · Trust Account Liability	3rd Quarter 2016 - Auto	5,540.27
215 · Trust Account Liability	4th Quarter 2016 - Auto	14,217.93
215 · Trust Account Liability	1st Quarter 2017 - Auto	10,196.86
215 · Trust Account Liability	Duplicate payment of 12/01/15 to 03/31/2016	-7,921.51

BankPlus Trust/IOLTA auto

22,033.55

Don Barrett, P.A.

7366

Thrash Law Firm	4/20/2017	
215 · Trust Account Liability	3rd Quarter 2016 - Auto	5,540.27
215 · Trust Account Liability	4th Quarter 2016 - Auto	14,217.93
215 · Trust Account Liability	1st Quarter 2017 - Auto	10,196.86
215 · Trust Account Liability	Duplicate payment of 12/01/15 to 03/31/2016	-7,921.51

BankPlus Trust/IOLTA auto

22,033.55

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: Bearings

Reporting Period: October 1, 2016 through December 31, 2016

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	\$8,285.33
Long Distance Telephone Expense	\$
Meals	\$547.28
Online Research	\$
Other (Binders for Depositions)	\$11.90
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$24.17
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$8,868.68

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: AVRP

Reporting Period: October 1, 2016 through December 31, 2016

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	\$4,906.39
Long Distance Telephone Expense	\$
Meals	\$232.06
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$210.80
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$5,349.25

AUTO PARTS EXPENSES

4th Quarter

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/5/16	MB	La Madeleine – Meal – AVRP	\$7.45
10/7/16	MB	Enterprise – Rental Car – AVRP	\$224.59
10/7/16	MB	Southwest – Flight – AVRP	\$758.97
10/7/16	MB	Four Points by Sheraton – Hotel – AVRP	\$740.25
10/15/16	MB	Southwest – Flight – Bearings	\$95.46
10/17/16	MB	Enterprise – Rental Car – Bearings	\$11.45
10/20/16	MB	Southwest – Flight Expense – Bearings	\$6.00
10/21/16	MB	Southwest – Flight – Bearings	\$653.96
10/22/16	MB	Southwest – Flight – AVRP	\$142.98
10/22/16	MB	Southwest – Flight – AVRP	\$221.98
11/1/16	MB	Burger King – Meal – Bearings	\$7.49
11/1/16	MB	Metro Cab – Bearings	\$52.00
11/1/16	MB	CVS – Binder for Depos – Bearings	\$11.90
11/1/16	MB	Allegra Print & Imaging – Copies – Bearings	\$24.17
11/2/16	MB	Detroit Marriott – Meal – Bearings	\$38.30
11/2/16	MB	Detroit Marriott – Meal – Bearings	\$26.32
11/2/16	MB	Ruby Tuesday – Meal – Bearings	\$11.85
11/2/16	MB	Parking – Clinton Airport – Bearings	\$28.34
11/2/16	MB	Stella Cart – Meal – Bearings	\$4.70
11/3/16	MB	Nayax, LLC – Meal – Bearings	\$1.65
11/3/16	MB	Detroit Marriott – Hotel – Bearings	\$390.06
11/3/16	MB	Southwest – Flight – Bearings	\$177.00
11/4/16	MB	Cash Cash USA – Bearings	\$84.90
11/4/16	MB	Southwest – Flight Bearings	\$28.89
11/6/16	MB	Enterprise – Rental Car – Bearings	\$35.29
11/7/16	MB	Taxi – Bearings - Bearings	\$50.00
11/10/16	MB	Dave & Busters – Meal	\$29.00
11/11/16	MB	Royal Car – Taxi – Bearings	\$72.00
11/11/16	MB	Centerplate – Meal – Bearings	\$64.60
11/11/16	MB	Hyatt Hotel – Lodging – Bearings	\$2,378.53
11/12/16	MB	Clinton National Airport – Parking - Bearings	\$54.50
11/12/16	MB	LGA Airport Restaurant – Meal – Bearings	\$33.76
11/16/16	MB	Cab – Bearings	\$51.84
11/16/16	MB	Rudy's Capital – Meal – Bearings	\$47.00
11/16/16	MB	MKE Nonnamil – Meal – Bearings	\$21.80

11/16/16	MB	La Madeleine – Meal – Bearings	\$7.57
11/16/16	MB	Blue Sushi – Meal – Bearings	\$21.71
11/17/16	MB	Southwest – Travel – Bearings	\$5.00
11/19/16	MB	Yellow Card – Taxi – Bearings	\$48.00
11/19/16	MB	Clinton National Airport – Parking – Bearings	\$56.68
11/19/16	MB	Coors Silver Bullet – Meal – Bearings	\$40.00
11/19/16	MB	Hyatt Hotel – Lodging – Bearings	\$1,118.01
11/21/16	MB	Southwest – Travel – Bearings	\$11.20
11/22/16	MB	Clinton Airport – Meal – Bearings	\$2.18
11/28/16	MB	Southwest – Travel – Bearings	\$685.96
11/28/16	MB	Southwest – Travel – Bearings	\$392.96
11/30/16	MB	Taxi – AVRP	\$46.04
12/1/16	MB	Todd English Food – Meal – AVRP	\$68.34
12/3/16	MB	Duane Reade – Meal – AVRP	\$7.61
12/3/16	MB	ERW Airp. Currito – Meal – AVRP	\$19.29
12/3/16	MB	Clinton National Airport – Parking – AVRP	\$43.60
12/3/16	MB	Chili's – Meal – AVRP	\$21.81
12/3/16	MB	LanLimousine – Cab – AVRP	\$115.12
12/3/16	MB	Hyatt Hotel – Lodging – AVRP	\$1,727.30
12/5/16	MB	Bar Louie – Meal – Bearings	\$40.01
12/6/16	MB	The Midwest – Meal – Bearings	\$20.00
12/6/16	MB	Mirna's Cuisine Pizza – Meal – Bearings	\$7.49
12/6/16	MB	Enterprise – Rental Car – Bearings	\$256.43
12/6/16	MB	Vino Volo – Meal – Bearings	\$61.53
12/6/16	MB	Public Square – Taxi – Bearings	\$30.00
12/6/16	MB	Hyatt Hotel – Lodging – Bearings	\$248.44
12/7/16	MB	Clinton National Airport – Parking – Bearings	\$28.34
12/7/16	MB	GoGoAir – Travel – Bearings	\$32.00
12/7/16	MB	Delta – Travel – Bearings	\$369.20
12/9/16	MB	Southwest – Travel – AVRP	\$840.17
12/12/16	MB	Southwest – Travel – Bearings	\$274.36
12/12/16	MB	Southwest – Travel – Bearings	\$285.68
12/13/16	MB	Chili's – Meal – Bearings	\$23.25
12/13/16	MB	Enterprise – Rental Car – Bearings	\$232.85
12/15/16	MB	Chili's – Meal – Bearings	\$37.07
12/15/16	MB	Public Square Garage – Parking – Bearings	\$40.00
12/19/16	MB	Taxi – AVRP	\$45.39
12/19/16	MB	Prova Pizza Bar – Meal – AVRP	\$27.86
12/19/16	MB	Hudson News – Meal – AVRP	\$6.13
12/22/16	MB	CenterPlate – Meal – AVRP	\$51.96

12/22/16	MB	Cantina Laredo – Meal – AVRP	\$21.61
12/31/16	TPT	Photocopies – 1,054 Copies @ \$0.20 per copy (AVRP)	\$210.80
		TOTAL	\$14,217.93

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: Wire Harness

Reporting Period: July 1, 2016 through September 30, 2016

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$2,943.75
Long Distance Telephone Expense	\$
Meals	\$144.59
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$3,088.34

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: General

Reporting Period: July 1, 2016 through September 30, 2016

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	\$136.40
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$136.40

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: Bearings

Reporting Period: July 1, 2016 through September 30, 2016

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers (FedEx)	\$261.40
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$1,946.78
Long Distance Telephone Expense	\$
Meals	\$107.35
Online Research	\$
Other (Assessments)	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$2,315.53

AUTO PARTS EXPENSES
3rd Quarter

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
7/23/16	MB	Slim's – Meal Expense – Wire Harness	\$55.31
7/23/16	MB	Express Food – Meal Expense – Wire Harness	\$25.00
7/23/16	MB	One Commerce – Meal Expense – Wire Harness	\$3.00
7/24/16	MB	Embassy Suites – Hotel/Lodging – Wire Harness	\$494.02
7/24/16	MB	Enterprise – Car Rental – Wire Harness	\$229.49
8/21/16	TPT	Dallas Airport – Meal Expense – Wire Harness	\$2.48
8/23/16	TPT	American Airlines – Airfare – Wire Harness	\$382.10
8/23/16	TPT	United Airlines – Airfare – Wire Harness	\$478.60
8/23/16	TPT	The Ritz-Carlton – Hotel/Lodging – Wire Harness	\$1,156.80
8/23/16	TPT	Taxi – Taxi Fare – Wire Harness	\$35.00
8/23/16	TPT	Yellow Cab – Taxi Fare – Wire Harness	\$45.00
8/23/16	TPT	Yellow Cab – Taxi Fare – Wire Harness	\$30.00
8/23/16	TPT	Alamo – Car Rental – Wire Harness	\$62.74
8/24/16	TPT	Elevated Experiences – Meal Expense – Wire Harness	\$12.43
8/24/16	TPT	Elevated Experiences- Meal Expense – Wire Harness	\$12.26
8/24/16	TPT	Palm Springs Aerial – Meal Expense – Wire Harness	\$25.95
8/24/16	TPT	Dallas Airport – Meal Expense – Wire Harness	\$8.16
8/24/16	TPT	Mileage to Airport – Wire Harness	\$30.00
9/20/16	MB	Taxi – Bearings	\$84.90
9/26/16	MB	FedEx Office – Bearings	\$134.51
9/27/16	MB	Miller Parking Services – Parking – Bearings	\$50.00
9/27/16	MB	Enterprise – Rental Car – Bearings	\$222.97
9/27/16	MB	Chili's – Meal Expense – Bearings	\$25.28
9/27/16	MB	Clinton Airport – Parking – Bearings	\$32.70
9/27/16	MB	FedEx – FedEx Documents to Hotel – Bearings	\$126.89
9/27/16	MB	Panera Bread – Meal Expense – Bearings	\$15.02
9/27/16	MB	Marriott – Hotel/Lodging – Bearings	\$666.62
9/28/16	MB	Panera Bread – Meal Expense - Bearings	\$15.02
9/28/16	MB	Panera Bread – Meal Expense – Bearings	\$13.80
9/28/16	MB	Panera Bread – Meal – Bearings – Bearings	\$13.80
9/29/16	MB	Hudson News – Meal Expense – Bearings	\$7.47
9/29/19	MB	Earl of Sandwich – Meal Expense – Bearings	\$16.99
9/29/16	MB	Enterprise – Rental Car – Bearings – Bearings	\$222.94
9/29/16	MB	Marriott – Hotel – Bearings	\$666.62
9/30/16	TPT	Photocopies – 682 @ \$0.20 per copy - General	\$136.40
		TOTAL	\$5,540.27

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: Bearings

Reporting Period: January 1, 2017 through March 31, 2017

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	\$1466.80
Long Distance Telephone Expense	\$
Meals	\$420.66
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$1887.46

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: AVR P

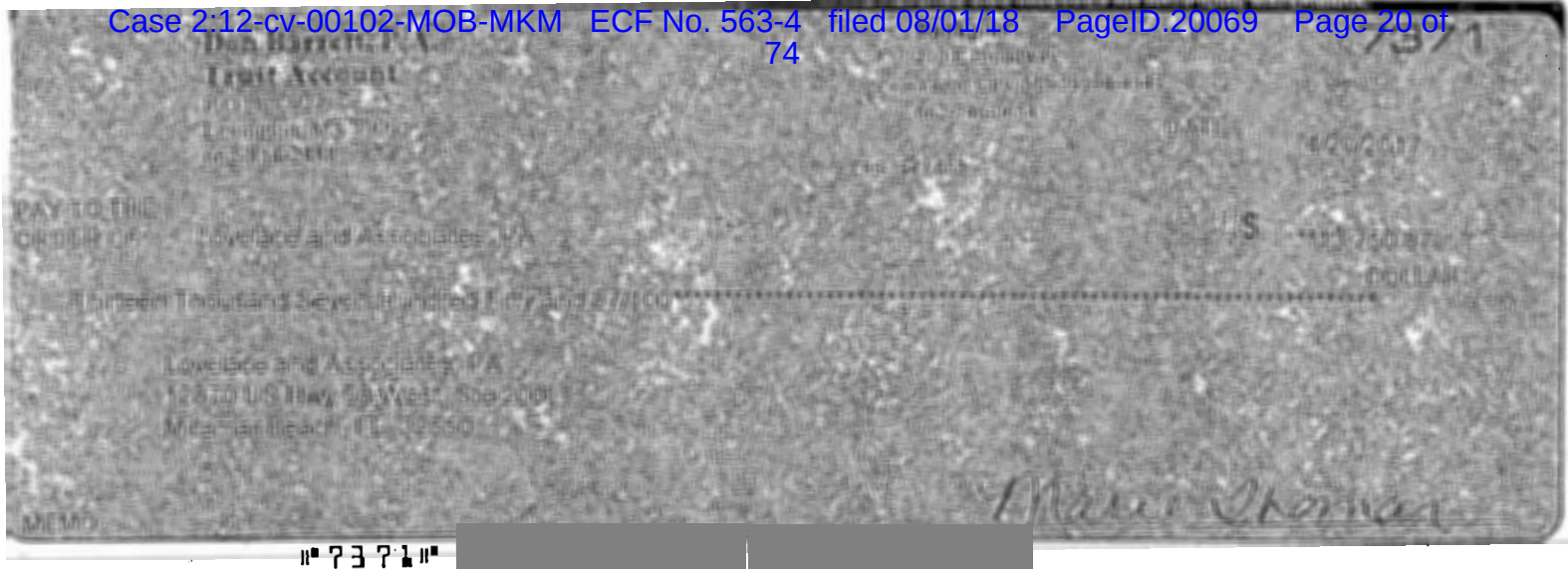
Reporting Period: January 1, 2017 through March 31, 2017

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	\$7481.71
Long Distance Telephone Expense	\$
Meals	\$577.22
Online Research	\$
Other (Depo Supplies & Services)	\$78.67
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$171.80
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$8309.40

AUTO PARTS EXPENSES
1st Quarter (2017)

<u>DATE</u>	<u>ATTY</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
1/11/17	MB	Barrio Café – Meal (Bearings)	\$51.30
1/11/17	MB	Eastside for Hire – Taxi (Bearings)	\$50.00
1/12/17	MB	Mistral Kitchen – Meal (Bearings)	\$60.00
1/12/17	MB	Southwest – Flight (Bearings)	\$428.80
1/12/17	MB	Southwest – Flight (Bearings)	\$411.54
1/13/17	MB	Tulio Ristorante – Meal (Bearings)	\$15.00
1/13/17	MB	NYC Deli – Meal (Bearings)	\$13.12
1/13/17	MB	Mamnoon – Meal (Bearings)	\$50.26
1/14/17	MB	Seattle Yellow Cab – Taxi (Bearings)	\$51.00
1/14/17	MB	NYC Deli – Meal (Bearings)	\$13.12
1/14/17	MB	Clinton Airport – Parking (Bearings)	\$43.60
1/16/17	MB	Office Depot – Deposition Supplies (AVRP)	\$15.24
1/17/17	MB	Taxi (AVRP)	\$27.80
1/17/17	MB	Hudson News – Meal (AVRP)	\$8.55
1/17/17	MB	Taxi (AVRP)	\$34.75
1/17/17	MB	Hyatt Hotel (AVRP)	\$852.93
1/18/17	MB	Hilton New York – Meal (AVRP)	\$4.84
1/20/17	MB	Staples – Shredding (AVRP)	\$16.33
1/20/17	MB	Cantina Laredo – Meal (AVRP)	\$24.91
1/20/17	MB	Car Service (AVRP)	\$69.00
1/20/17	MB	Clinton Airport – Parking (AVRP)	\$35.97
1/20/17	MB	Hyatt Hotels (AVRP)	\$1,216.98
1/20/17	MB	National High Class Coronary – Meal (AVRP)	\$69.00
1/22/17	MB	Southwest – Flight (AVRP)	\$293.10
1/23/17	MB	Panera Bread – Meal – (Bearings)	\$14.39
1/23/17	MB	Taxi (Bearings)	\$55.75
1/24/17	MB	Detroit Marriott – Meal (Bearings)	\$60.00
1/24/17	MB	Sweet Georgia's – Meal (Bearings)	\$42.40
1/25/17	MB	Taxi (Bearings)	\$93.76
1/25/17	MB	Marriott Hotel (Bearings)	\$332.35
1/27/17	MB	Chili's – Meal (Bearings)	\$15.30
1/27/17	MB	Lexington Brass – Meal (Bearings)	\$85.77
1/27/17	MB	JD Limousine (AVRP)	\$69.00
1/27/17	MB	Clinton Airport – Parking (AVRP)	\$54.50
1/27/17	MB	Hyatt Hotel (AVRP)	\$841.92
2/1/17	MB	Southwest – Flight (AVRP)	\$210.99
2/7/17	MB	Food Court – LR Airport – Meal (AVRP)	\$7.31

2/7/17	MB	Taxi (AVRP)	\$62.79
2/7/17	MB	Amada – Meal (AVRP)	\$47.19
2/7/17	MB	Morton's The Steakhouse – Meal (AVRP)	\$82.59
2/8/17	MB	Picasso Pizzeria – Meal (AVRP)	\$13.01
2/8/17	MB	MTA Transit (AVRP)	\$10.00
2/8/17	MB	Southwest Black House – Meal (AVRP)	\$30.00
2/8/17	MB	Hudson Produce – Meal (AVRP)	\$6.00
2/9/17	MB	Hudson Produce – Meal (AVRP)	\$5.18
2/9/17	MB	MetroCard (AVRP)	\$3.00
2/9/17	MB	New York Central – Meal (AVRP)	\$45.38
2/10/17	MB	Taxi (AVRP)	\$5.28
2/10/17	MB	Taxi (AVRP)	\$17.76
2/10/17	MB	Hudson News – Meal (AVRP)	\$3.09
2/10/17	MB	Six Blocks Bakery Café – Meal (AVRP)	\$19.37
2/10/17	MB	Cantina Laredo – Meal (AVRP)	\$29.31
2/10/17	MB	Clinton Airport – Parking (AVRP)	\$56.68
2/10/17	MB	Hyatt Hotel (AVRP)	\$365.37
2/10/17	MB	NYC Taxi (AVRP)	\$56.81
2/11/17	MB	LaGuardia Airport – Meal (AVRP)	\$19.33
2/12/17	MB	Southwest – Flight (AVRP)	\$415.88
2/13/17	MB	Ace Cab (AVRP)	\$43.60
2/13/17	MB	McDonald's – Meal (AVRP)	\$6.68
2/16/17	MB	Clinton Airport – Parking (AVRP)	\$39.24
2/16/17	MB	ChiTown Tax (AVRP)	\$42.19
2/16/17	MB	Hyatt Hotel (AVRP)	\$904.16
3/7/17	MB	Burger King – Meal (AVRP)	\$7.59
3/7/17	MB	Taxi to Hotel (AVRP)	\$44.79
3/8/17	MB	Staples – Depo Supplies (AVRP)	\$3.27
3/8/17	MB	Hilton New York Herb N' Kitchen – Meal (AVRP)	\$4.84
3/8/17	MB	Staples – Depo Supplies (AVRP)	\$43.83
3/9/17	MB	Lexington Brass – Meal (AVRP)	\$85.00
3/9/17	MB	Central Market – Meal (AVRP)	\$15.95
3/10/17	MB	Hyatt Hotel (AVRP)	\$1601.36
3/10/17	MB	Taxi to Airport (AVRP)	\$49.18
3/10/17	MB	Cantina Laredo – Meal (AVRP)	\$42.10
3/10/17	MB	Clinton Airport Parking (AVRP)	\$56.68
3/31/17	TPT	Photocopies – 859 Copes @ \$0.20 per copy (AVRP)	\$171.80
		TOTAL	\$10,196.86



Don Barrett, P.A.

7371

Lovelace and Associates, PA
215 - Trust Account Liability

Auto - 4th Quarter 2016 expenses

4/20/2017

13,750.87

BankPlus Trust/IOLTA

13,750.87

Don Barrett, P.A.

7371

Lovelace and Associates, PA
215 - Trust Account Liability

Auto - 4th Quarter 2016 expenses

4/20/2017

13,750.87

BankPlus Trust/IOLTA

13,750.87

Revised
4-19-17

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

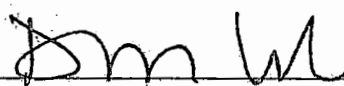
- | | |
|--|---|
| <input checked="" type="checkbox"/> Wire Harness | <input type="checkbox"/> Motor Generators |
| <input type="checkbox"/> Instrument Panel Clusters | <input type="checkbox"/> Steering Angle Sensors |
| <input type="checkbox"/> Fuel Senders | <input type="checkbox"/> HID Ballasts |
| <input type="checkbox"/> Occupant Safety Systems | <input type="checkbox"/> Inverters |
| <input type="checkbox"/> Alternators | <input type="checkbox"/> Air Flow Meters |
| <input type="checkbox"/> Radiators | <input type="checkbox"/> Fuel Injection Systems |
| <input type="checkbox"/> Starters | <input type="checkbox"/> ATF Warmers |
| <input type="checkbox"/> Switches | <input type="checkbox"/> Valve Timing Control Devices |
| <input type="checkbox"/> Ignition Coils | <input type="checkbox"/> Electronic Throttle Bodies |

Firm Name: Lovelace and Associates, P.A.

Quarter Beginning October 2016 Quarter Ending December 2016

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	\$5,349.33
Train Fare	
Cabs	718.42
Other Local Transportation	
Travel – Meals	2,067.52
Travel – Hotel	5,000.27
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	141.60
In-House Photocopying	56.25
Outside Photocopying	
Court Fees (filing, etc.)	
Professional Fees (Document Review Temps)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	417.48
Miscellaneous (Describe)	
CURRENT TOTAL	\$13,750.87

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.


Signed:

4-19-17
Date:

Case 2:12-cv-00102-MOB-MKM ECF No. 563-4 Filed 08/01/18 PageID.2071 Page 22 of 74

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICR LINE. THE MICR LINE IS LOCATED AT THE BOTTOM OF THE DOCUMENT. THE MICR LINE IS USED FOR AUTOMATIC PROCESSING OF THE DOCUMENT. THE MICR LINE IS NOT TO BE USED FOR ANY OTHER PURPOSE.

Don Barrett, P.A.
Trust Account
P.O. Box 927
Lexington, MS 39095
601.398.2111

7435

DATE 6/22/2017

PAY TO THE ORDER OF Don Barrett P.A.

\$ 47,483.06

Forty Seven Thousand Four Hundred Eighty Three and 06/100

Don Barrett P.A.
P.O. Box 927
Lexington, MS 39095

4748306

Don Barrett, P.A.

7435

Don Barrett P.A.
215 · Trust Account Liability
215 · Trust Account Liability
215 · Trust Account Liability

6/22/2017

Wire Harness 3rd & 4th Quarter 2016, 1st Quarter 2017
Heater Control - 4th Quarter 2016
Fuel Injection 1st Quarter 2017

28,463.31
8,432.12
10,588.53

BankPlus Trust/IOLTA

47,483.96

Don Barrett, P.A.

7435

Don Barrett P.A.
215 · Trust Account Liability
215 · Trust Account Liability
215 · Trust Account Liability

6/22/2017

Wire Harness 3rd & 4th Quarter 2016, 1st Quarter 2017
Heater Control - 4th Quarter 2016
Fuel Injection 1st Quarter 2017

28,463.31
8,432.12
10,588.53

BankPlus Trust/IOLTA

47,483.96

		Don Barrett, PA	Auto Expenses		
Wire Harness					
		3rd Quarter 2016	\$20,151.98	✓	
		4th Quarter 2016	\$5,949.12	✓	
		1st Quarter 2017	\$2,362.21	✓	
			\$28,463.31		\$28,463.31
Heater Control		4th Quarter 2016			\$8,432.12 ✓
Fuel Injection Systems					
		1st Quarter 2017			\$10,588.53 ✓
					\$47,483.96

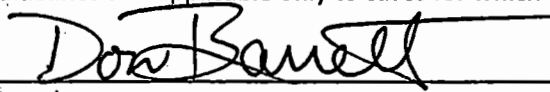
AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- Wire Harness
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☐ Occupant Safety Systems
- ☐ Alternators
- ☐ Radiators
- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Fuel Injection Systems
- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

Firm Name: **Barrett Law Group, PA**Quarter Beginning: October 2016Quarter Ending: December 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation (includes mileage reimbursement)	\$1,920.60	\$1,920.60
Airfare	\$2,472.20	\$63,644.72
Train Fare		\$8,813.19
Cabs		\$12,264.23
Other Local Transportation		\$0.00
Travel - Meals	\$498.42	\$10,095.39
Travel - Miscellaneous (Lodging)	\$987.53	\$36,549.61
Federal Express, Local Courier, etc.		\$891.30
Postage Charges		\$48.49
Long Distance	\$70.37	\$487.35
In-House Photocopying		\$1,061.41
Outside Photocopying		\$0.00
Court Fees (filing, etc.)		\$226.00
Professional Fees		\$0.00
Witness/Service Fees		\$0.00
Court Reporter/Transcripts		\$0.00
Computer Research		\$38.48
Miscellaneous (Describe)		\$19,124.85
		\$0.00
CURRENT TOTAL	\$5,949.12	\$155,165.62

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.


 Signed: _____

9-Mar-17

Date: _____

Don Barrett, P.A.

P. O. Box 927

Lexington, MS 39095

Lexington, MS 39095

Case Name: Wire Harness- 4th Quarter 2016

	Date	Vendor	Description	Amount	check #	Total
Filing Fees:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Filing Fees Total	\$0.00
Reports						\$0.00
						\$0.00
						\$0.00
					Records/Reports Total	\$0.00
Court Reporter:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Court Reporter Total	\$0.00
Copies/Fax						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Copies Total	\$0.00
Postage:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Postage Total	\$0.00
Expert:						\$0.00
						\$0.00
						\$0.00
					Expert Total	\$0.00
Travel - Air:	9/13/2016	American Airlines	DB travel to NY	\$600.00	ck# 9006	\$600.00
	11/15/16	Lexington Air Service	DB to Detroit - adjusted from \$8,640.00	\$1,010.10	ck# 9145	\$1,010.10
✓	12/02/16	Lexington Air Service	DB to CA 12/02/16 - 12/04/16 adjsuted from \$13,320.00	\$862.10	ck# 9145	\$862.10
						\$0.00
					Travel-Air Total	\$2,472.20
Travel - Lodging:	11/16/16	Detroit Athletic Club	DB to Detroit	\$307.40	ck# 9138	\$307.40
	11/18/16	Intercontinental Willard	DB to DC	\$680.13	ck#9138	\$680.13
						\$0.00
						\$0.00
					Travel-Lodging Total	\$987.53
Travel - Meals:	11/19/16	Brick Top's	DB to Nashville	\$269.45	ck# 9138	\$269.45
	08/30/16	Dairy Queen	KBR - Meridian depo	\$4.27	ck# 9006	\$4.27
	08/30/16	Newks	KBR - depo	\$8.71	ck# 9006	\$8.71
						\$0.00
✓	08/31/16	McAlister's	NTM to Jackson - Lance Gregory depo (not included in September)	\$59.41	ck# 9006	\$59.41
	09/28/16	Tadich Grill	DB to DC	\$156.58	ck# 9093	\$156.58
						\$0.00
					Travel-Meals Total	\$498.42
Travel - Misc:	08/29/16	NYC Taxi	DB to NY 08/29/16 (turned in 10/06/16)	\$30.35	ck# 9010	\$30.35
	08/29/16	Lexington Kangaroo	KBR - depo	\$43.84	ck# 9006	\$43.84
	08/30/16	NYC Taxi	DB to NY 08/29/16 (turned in 10/06/16)	\$23.50	ck# 9010	\$23.50
	09/02/16	Lexington Kangaroo	KBR - depo	\$43.44	ck# 9006	\$43.44

Transportation

	09/14/16	Uber	DB to Detroit	\$90.38	ck# 9043	\$90.38
	09/15/16	RPS Jackson	DB to NY	\$42.00	ck# 9006	\$42.00
	09/21/16	Sterling Starns	travel to NY - Panasonic Proffer 09/19/16 to 09/21/16	\$96.14	ck#8995	\$96.14
	09/23/16	Cary Littlejohn	travel 09/18/16 to 09/23/16 meeting with experts	\$461.35	ck# 8993	\$461.35
	09/29/16	Don Barrett	travel	\$150.00	ck# 9010	\$150.00
	11/15/16	Robert Morris Transporation	Taxi - Db to Detroit	\$60.00	ck# 9138	\$60.00
	11/20/16	Presidential Limousine	Taxi - DB to DC	\$156.00	ck# 9138	\$156.00
	11/20/16	Presidential Limousine	Taxi - DB to DC	\$186.00	ck# 9138	\$186.00
	12/10/16	Richard Barrett	meeting with Williams, Barrett and Cuneo 12/2/16 to 12/4/16	\$537.60		\$537.60
						\$0.00
						\$0.00
					Travel-Misc Total	\$1,920.60
Phone:	10/06/16	Don Barrett	cell phone - August	\$39.09	ck# 9010	\$39.09
	11/06/16	Don Barrett	October cell phone	\$31.28	ck#9043	\$31.28
						\$0.00
						\$0.00
					Phone Total	\$70.37
Research:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Research Total	\$0.00
Witness Fee:						\$0.00
						\$0.00
						\$0.00
					Witness Total	\$0.00
Shipping						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Shipping Total	\$0.00
Misc.:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Misc Total	\$0.00
					GRAND TOTAL	\$5,949.12
SUB-TOTALS						
Filing Fees:		\$0.00				
Records/Reports:		\$0.00				
Court Reporter:		\$0.00				
Copies:		\$0.00				
Postage:		\$0.00				
Expert:		\$0.00				
Travel - Air:		\$2,472.20				
Travel - Lodging:		\$987.53				
Travel - Meals:		\$498.42				
Travel - Misc:		\$1,920.60				
Phone:		\$70.37				
Research:		\$0.00				
Witness Fee:		\$0.00				
Shipping		\$0.00				
Misc Total:		\$0.00				
GRAND TOTAL		\$5,949.12				

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- Wire Harness
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☐ Occupant Safety Systems
- ☐ Alternators
- ☐ Radiators

- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Fuel Injection Systems

- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

Firm Name: **Barrett Law Group, PA**Quarter Beginning: January 2017Quarter Ending: March 2017

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		\$1,920.60
Airfare	\$1,010.10	\$64,654.82
Train Fare		\$8,813.19
Cabs		\$12,264.23
Other Local Transportation		\$0.00
Travel - Meals	\$133.24	\$10,228.63
Travel - Miscellaneous (Lodging)	\$947.96	\$37,497.57
Federal Express, Local Courier, etc.	\$28.60	\$919.90
Postage Charges		\$48.49
Long Distance	\$213.85	\$701.20
In-House Photocopying		\$1,061.41
Outside Photocopying		\$0.00
Court Fees (filing, etc.)		\$226.00
Professional Fees		\$0.00
Witness/Service Fees		\$0.00
Court Reporter/Transcripts		\$0.00
Computer Research	\$28.46	\$66.94
Miscellaneous (Describe)		\$19,124.85
		\$0.00
CURRENT TOTAL	\$2,362.21	\$157,527.83

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.



Signed:

18-Apr-17

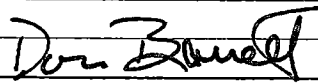
Date:

Don Barrett, P.A.						
P. O. Box 927						
Lexington, MS 39095						
Case Name: Wire Harness- March 2017						
	Date	Vendor	Description	Amount	check #	Total
Filing Fees:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Filing Fees Total	\$0.00
Reports						\$0.00
						\$0.00
						\$0.00
					Records/Reports Total	\$0.00
Court Reporter:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Court Reporter Total	\$0.00
Copies/Fax						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Copies Total	\$0.00
Postage:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Postage Total	\$0.00
Expert:						\$0.00
						\$0.00
						\$0.00
					Expert Total	\$0.00
Travel - Air:	1/24/2017	Lexington Air Service	DB to Detroit - reduced from \$8460.00	\$1,010.10	ck# 9315	\$1,010.10
					Travel-Air Total	\$1,010.10
Travel - Lodging:	12/04/16	Embassy Suites	RB to CA	\$537.60	ck#9195	\$537.60
	01/24/17	Detroit Athletic Club	DB to Detroit	\$320.63		\$320.63
					Travel-Lodging Total	\$858.23
Travel - Meals:	01/24/17	Detroit Seafood Market	DB to Detroit	\$133.24		\$133.24

[illegible]

GRAND TOTAL	\$2,362.21					

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

<input type="checkbox"/> Wire Harness	<input type="checkbox"/> Motor Generators	<input type="checkbox"/> Starters		
<input type="checkbox"/> Instrument Panel Clusters	<input type="checkbox"/> Steering Angle Sensors	<input type="checkbox"/> Switches		
<input type="checkbox"/> Fuel Senders	<input type="checkbox"/> HID Ballasts	<input type="checkbox"/> Ignition Coils		
<input type="checkbox"/> Occupant Safety Systems	<input type="checkbox"/> Inverters	<input type="checkbox"/> ATF Warmers		
<input type="checkbox"/> Alternators	<input type="checkbox"/> Air Flow Meters	<input type="checkbox"/> Valve Timing Control Devices		
<input type="checkbox"/> Radiators	<input type="checkbox"/> Fuel Injection Systems	<input type="checkbox"/> Electronic Throttle Bodies		
Firm Name: Barrett Law Group, PA				
Quarter Beginning: July 2016	Quarter Ending: September 2016			
DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT		
Travel - Transprotation		\$0.00		
Airfare	\$11,020.93	\$61,172.52		
Train Fare		\$8,813.19		
Cabs		\$12,264.23		
Other Local Transportation		\$0.00		
Travel - Meals	\$986.50	\$9,596.97		
Travel - Miscellaneous	\$7,620.63	\$35,562.08		
Federal Express, Local Courier, etc.	\$38.88	\$891.30		
Postage Charges		\$48.49		
Long Distance	\$135.63	\$416.98		
In-House Photocopying	\$337.41	\$1,061.41		
Outside Photocopying		\$0.00		
Court Fees (filing, etc.)		\$226.00		
Professional Fees		\$0.00		
Witness/Service Fees		\$0.00		
Court Reporter/Transcripts		\$0.00		
Computer Research	\$12.00	\$38.48		
Miscellaneous (Describe)		\$19,124.85		
		\$0.00		
CURRENT TOTAL	\$20,151.98	\$149,216.50		
I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.				
				
Signed:	Date: 29-Sep-16			

Don Barrett, P.A.						
P. O. Box 927						
Lexington, MS 39095						
Lexington, MS 39095						
Case Name:Wire Harness- July 2016						
	Date	Vendor	Description	Amount	check #	Total
Filing Fees:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Filing Fees Total	\$0.00
Reports						\$0.00
						\$0.00
						\$0.00
					Records/Reports Total	\$0.00
Court Reporter:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Court Reporter Total	\$0.00
Copies/Fax						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Copies Total	\$0.00
Postage:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Postage Total	\$0.00
Expert:						\$0.00
						\$0.00
						\$0.00
					Expert Total	\$0.00
Travel - Air:	5/5/2016	American Airlines	DB to Detroit - Cuneo meeting	\$674.20	ck# 8744	\$674.20
	4/14/2016	United Airlines	DB travel	\$59.00	ck# 8800	\$59.00
	4/14/2016	United Airlines	DB travel	\$57.00	ck# 8800	\$57.00
	4/14/2016	United Airlines	DB travel	\$1,200.20	ck# 8800	\$1,200.20
	04/18/16	United Airlines	DB travel to Denver	\$621.20	ck# 8800	\$621.20
	04/22/16	United Airlines	DB travel to Denver	\$520.60	ck# 8800	\$520.60
	04/22/16	United Airlines	DB travel to Denver	\$200.00	ck# 8800	\$200.00
	05/23/16	United Airlines	DB travel to Chicago	\$666.10	ck# 8840	\$666.10
	04/26/16	American Airlines	DB to NY	\$495.65	ck# 8688	\$495.65
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Travel-Air Total	\$4,493.95
Travel - Lodging:	04/20/16	Quality Inn	DB to GA	\$83.39	ck# 8800	\$83.39
	04/15/16	Westin Hotel	DM to NC	\$333.07	ck 8688	\$333.07
						\$0.00
						\$0.00
						\$0.00
					Travel-Lodging Total	\$416.46
Travel - Meals:	04/28/16	Avra Rest	DB to NY - Melco	\$319.80	ck# 8800	\$319.80
						\$0.00
						\$0.00
						\$0.00
						\$0.00

[illegible]

Misc Total:	\$0.00					
GRAND TOTAL	\$5,501.05					

Don Barrett, P.A.

P. O. Box 927

Lexington, MS 39095

Lexington, MS 39095

Case Name: Wire Harness- August 2016

	Date	Vendor	Description	Amount	check #	Total
Filing Fees:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Filing Fees Total	\$0.00
Reports						\$0.00
						\$0.00
						\$0.00
					Records/Reports Total	\$0.00
Court Reporter:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Court Reporter Total	\$0.00
Copies/Fax	08/11/16	Honda Windward	scanning/coping	\$337.41	ck# 8897	\$337.41
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Copies Total	\$337.41
Postage:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Postage Total	\$0.00
Expert:						\$0.00
						\$0.00
						\$0.00
					Expert Total	\$0.00
Travel - Air:	7/13/2016	Delta Airlines	Brandi H to UT	\$562.60	ck # 8881	\$562.60
	7/13/2016	Delta Airlines	Brandi H to UT	\$25.00	ck # 8881	\$25.00
	7/13/2016	Delta Airlines	Brandi H to UT	\$49.00	ck # 8881	\$49.00
	07/14/16	Delta Airlines	Brandi H to UT	\$8.49	ck # 8881	\$8.49
	07/14/16	Delta Airlines	Brandi H to UT	\$8.00	ck # 8881	\$8.00
	07/14/16	Delta Airlines	Brandi H to UT	\$8.00	ck # 8881	\$8.00
	7/15/2016	Delta Airlines	Brandi H from UT	\$572.60	ck # 8881	\$572.60
	07/15/16	Delta Airlines	Brandi H to UT	\$25.00	ck # 8881	\$25.00
	07/16/16	Delta Airlines	Brandi H to UT	\$9.99	ck # 8881	\$9.99
	07/26/16	Delta Airlines	Brandi H to St Louis	\$674.60	ck # 8881	\$674.60
	07/26/16	Delta Airlines	Brandi H to St Louis	\$25.00	ck # 8881	\$25.00
	07/28/16	Delta Airlines	Brandi H From St Louis	\$674.60	ck # 8881	\$674.60
						\$0.00
						\$0.00
					Travel-Air Total	\$2,642.88
Travel - Lodging:	04/26/16	Cornell Club	DB to NY - Melco	\$1,329.79	ck# 8870	\$1,329.79
	04/27/16	Aramark City Field	DB to NY - Melco	\$79.00	ck# 8870	\$79.00
	07/16/16	Hilton Garden Inn	Brandi H to UT	\$591.04	ck# 8881	\$591.04
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Travel-Lodging Total	\$1,999.83
Travel - Meals:	07/13/16	Whiskey Street	Brandi H to UT	\$45.00	ck# 8881	\$45.00
	07/13/16	TGI Friday's	Brandi H to UT	\$48.29	ck# 8881	\$48.29
	07/14/16	McDonalds	Brandi H to UT	\$4.82	ck# 8881	\$4.82

	07/14/16	R&R BBQ	Brandi H to UT	\$16.20	ck# 8881	\$16.20
	07/15/16	Squatters Airport	Brandi H to UT	\$19.00	ck# 8881	\$19.00
	07/15/16	Paradies	Brandi H to UT	\$13.48	ck# 8881	\$13.48
	07/15/16	SGJJ - Airport	Brandi H to UT	\$36.16	ck# 8881	\$36.16
	07/26/16	Blue Moon Brew House	Brandi H to St Louis	\$43.17	ck# 8881	\$43.17
	07/26/16	Eurocafe	Brandi H to St Louis	\$6.19	ck# 8881	\$6.19
	07/27/16	Drunken Dish	Brandi H to St Louis	\$23.62	ck# 8881	\$23.62
	07/27/16	Budweiser Brew House	Brandi H to St Louis	\$23.24	ck# 8881	\$23.24
	07/28/16	The Fudgery At Ball Park	Brandi H to St Louis	\$5.59	ck# 8881	\$5.59
	07/28/16	A-o6 Beers	Brandi H to St Louis	\$38.46	ck# 8881	\$38.46
	07/28/16	Airport Retail Management	Brandi H to St Louis	\$37.29	ck# 8881	\$37.29
	07/28/16	Chick Fil A	Brandi H to St Louis	\$13.42	ck# 8881	\$13.42
						\$0.00
						\$0.00
					Travel-Meals Total	\$373.93
Travel - Misc:	07/13/16	Pickens Kanagroo	Brandi to UT	\$8.56	ck# 8881	\$8.56
	07/14/16	ABM parking	Brandi to UT	\$12.00	ck# 8881	\$12.00
	07/15/16	Hertz Rental	Brandi to UT	\$389.61	ck# 8881	\$389.61
	07/15/16	RPS Jackson Airport	Brandi to UT	\$47.00	ck# 8881	\$47.00
	07/26/16	VTS St Louis Airport	Brandi to St Louis	\$47.82	ck# 8881	\$47.82
	07/28/16	Mohamednur Issak	Brandi to St Louis taxi	\$56.54	ck# 8881	\$56.54
	07/28/16	RPS Jackson Airport	Brandi to St Louis	\$43.00	ck# 8881	\$43.00
	08/11/16	Brandi Hamilton	travel to St Louis 07/26/16	\$85.00	ck# 8874	\$85.00
					Travel-Misc Total	\$689.53
Phone:	08/11/16	Don Barrett	cell phone - July	\$26.50	ck# 8870	\$26.50
						\$0.00
						\$0.00
						\$0.00
					Phone Total	\$26.50
Research:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Research Total	\$0.00
Witness Fee:						\$0.00
						\$0.00
						\$0.00
					Witness Total	\$0.00
Shipping						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Shipping Total	\$0.00
Misc.:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Misc Total	\$0.00
					GRAND TOTAL	\$6,070.08
SUB-TOTALS						
Filing Fees:	\$0.00					
Records/Reports:	\$0.00					
Court Reporter:	\$0.00					
Copies:	\$337.41					
Postage:	\$0.00					
Expert:	\$0.00					
Travel - Air:	\$2,642.88					
Travel - Lodging:	\$1,999.83					

Travel - Meals:	\$373.93				
Travel - Misc:	\$689.53				
Phone:	\$26.50				
Research:	\$0.00				
Witness Fee:	\$0.00				
Shipping	\$0.00				
Misc Total:	\$0.00				
GRAND TOTAL	\$6,070.08				

Don Barrett, P.A.

P. O. Box 927

Lexington, MS 39095

Lexington, MS 39095

Case Name: Wire Harness- September 2016

	Date	Vendor	Description	Amount	check #	Total
Filing Fees:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Filing Fees Total	\$0.00
Litigation						\$0.00
						\$0.00
						\$0.00
					Litigation Total	\$0.00
Court Reporter:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Court Reporter Total	\$0.00
Copies/Fax						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Copies Total	\$0.00
Postage:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Postage Total	\$0.00
Expert:						\$0.00
						\$0.00
						\$0.00
					Expert Total	\$0.00
Travel - Air:						
	9/10/2016	Delta Airlines	DB to MI	\$1,543.70		\$1,543.70
	09/11/16	Delta Airlines	B Hamilton to FL	\$776.60		\$776.60
	09/14/16	Delta Airlines	SS to NY	\$787.20		\$787.20
	09/15/16	Delta Airlines	B Hamilton from FL	\$776.60		\$776.60
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Travel-Air Total	\$3,884.10
Travel - Lodging:						
	09/14/16	Detroit Athletic Club	DB to MI	\$561.61		\$561.61
	09/14/16	Waterstone Resort	B Hamilton to FL	\$517.70		\$517.70
		St Regis Hotel - Original Bill				
	09/16/16	\$1,117.11 (-138.23-bar chg)	DB to NY	\$978.88		\$978.88
	09/19/16	The Roosevelt Hotel	SS to NY - 2 says	\$1,643.66		\$1,643.66
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Travel-Lodging Total	\$3,701.85
Travel - Meals:						
	06/28/16	Arby's	NTM and CB to MDL Seminar	\$14.58	ck# 8881	\$14.58
	06/28/16	Charlotte 2090	NTM and CB to MDL Seminar	\$4.28	ck# 8881	\$4.28
	06/28/16	Burger King	NTM and CB to MDL Seminar	\$15.57	ck# 8881	\$15.57
	07/29/16	Master Concessionaire	Bhamilton	\$5.93		\$5.93
	09/11/16	Eurocafe	B Hamilton to FL	\$5.86		\$5.86
	09/11/16	McDonals	B Hamilton to FL	\$13.46		\$13.46
	09/12/16	Boca Breakfast & Lunch	B Hamilton to FL	\$27.79		\$27.79
	09/12/16	Lemongrass	B Hamilton to FL	\$77.17		\$77.17
	09/15/16	Chick Fil A	B Hamilton to FL	\$7.96		\$7.96

	09/19/16	Corner Bakery Café	SS to NY	\$10.79		\$10.79
	09/19/16	Eurocafe	SS to NY	\$12.61		\$12.61
	09/19/16	NYC Taxi	SS to NY	\$50.79		\$50.79
	09/21/16	Java Moon Café	SS to NY	\$5.98		\$5.98
	09/21/16	RPS	SS to NY	\$40.00		\$40.00
						\$0.00
						\$0.00
						\$0.00
					Travel-Meals Total	\$292.77
Travel - Misc:						
	06/28/16	RPS Jackson	NTM and CB to MDL seminar	\$32.00	ck# 8881	\$32.00
	08/31/16	Nanci T. Maddux	Travel - Cannon Nissan Depo	\$66.00	ck# 8920	\$66.00
	09/11/16	Brandi Harmilton	travel to Boca Raton, FL, depo	\$85.00	ck# 8963	\$85.00
	09/11/16	Yellow Cab	B Hamilton to FL	\$83.90		\$83.90
	09/12/16	Uber	B Hamilton to FL	\$5.00		\$5.00
	09/12/16	Uber	B Hamilton to FL	\$5.33		\$5.33
	09/12/16	Uber	B Hamilton to FL	\$5.00		\$5.00
	09/13/16	Metro Cars Taxi	DB to MI	\$73.00		\$73.00
	09/13/16	RPS Jackson	B Hamilton to FL	\$43.00		\$43.00
	09/13/16	T2 Temp Great American	B Hamilton to FL	\$17.66		\$17.66
	09/13/16	Uber	B Hamilton to FL	\$5.13		\$5.13
	09/13/16	Uber	B Hamilton to FL	\$29.08		\$29.08
	09/14/16	NYC Taxi	DB to NY - taxi	\$51.39		\$51.39
	09/15/16	Juan Collardo	DB to NY - taxi	\$90.00		\$90.00
	09/21/16	Cosi #24	SS to NY	\$4.65		\$4.65
	09/21/16	Gerald King Yellow Taxi	SS to NY	\$96.00		\$96.00
	09/21/16	HudsonNews	SS to NY	\$3.99		\$3.99
					Travel-Misc Total	\$696.13
Phone:						
						\$0.00
						\$0.00
						\$0.00
					Phone Total	\$0.00
Research:						
	09/02/16	Pacer 06/30/16	research	\$6.00	ck# 8921	\$6.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Research Total	\$6.00
Witness Fee:						
						\$0.00
						\$0.00
						\$0.00
					Witness Total	\$0.00
Shipping						
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Shipping Total	\$0.00
Misc.:						
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Misc Total	\$0.00
					GRAND TOTAL	\$8,580.85
SUB-TOTALS						
Filing Fees:	\$0.00					
Litigation	\$0.00					
Court Reporter:	\$0.00					
Copies:	\$0.00					

- Heater Control Panels
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☐ Occupant Safety Systems
- ☐ Alternators
- ☐ Radiators
- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Fuel Injection Systems
- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

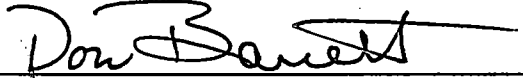
Firm Name: **Barrett Law Group, PA**

Quarter Beginning: October 2016

Quarter Ending: December 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation	\$533.40	\$533.40
Airfare	\$1,826.20	\$1,826.20
Train Fare		\$0.00
Cabs		\$0.00
Other Local Transportation		\$0.00
Travel - Meals	\$2,748.57	\$2,748.57
Travel - Miscellaneous (Lodging)	\$3,323.95	\$3,323.95
Federal Express, Local Courier, etc.		\$0.00
Postage Charges		\$0.00
Long Distance		\$0.00
In-House Photocopying		\$0.00
Outside Photocopying		\$0.00
Court Fees (filing, etc.)		\$0.00
Professional Fees		\$0.00
Witness/Service Fees		\$0.00
Court Reporter/Transcripts		\$0.00
Computer Research		\$0.00
Miscellaneous (Describe)		\$0.00
		\$0.00
CURRENT TOTAL	\$8,432.12	\$8,432.12

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.


Signed: _____

9-Mar-17

Date: _____

Don Barrett, P.A.						
P. O. Box 927						
Lexington, MS 39095						
(662) 834-2488						
Case Name Heater Control - 4th Quarter						
	Date	Vendor	Description	Amount	check #	Total
Filing Fees:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Filing Fees Total	\$0.00
Reports						\$0.00
						\$0.00
						\$0.00
					Records/Reports Total	\$0.00
Court Reporter:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Court Reporter Total	\$0.00
Copies/Fax						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Copies Total	\$0.00
Postage:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Postage Total	\$0.00
Expert:						\$0.00
						\$0.00
						\$0.00
					Expert Total	\$0.00
Travel - Air:	12/10/2016	Lexington Air Service	DB and KBR to NY (ALPS)- adjusted from \$12,600.00	\$1,826.20		\$1,826.20
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Travel-Air Total	\$1,826.20
Travel - Lodging:	12/13/16	Manhattan	KRB to NY (Alps)	\$1,034.49	ck# 9207	\$1,034.49
	12/13/16	Manhattan	KRB to NY (Alps)	\$1,137.79	ck# 9207	\$1,137.79
	12/13/16	Manhattan	KRB to NY (Alps)	\$1,137.79	ck# 9207	\$1,137.79
	12/13/16	Manhattan	KRB to NY (Alps)	\$13.88	ck# 9207	\$13.88
						\$0.00
					Travel-Lodging Total	\$3,323.95
Travel - Meals:	12/10/16	Rosie O'Grady's Rest	DB to NY (Alps)	\$227.23	ck# 9207	\$227.23
	12/11/16	Il Corso Rest	DB to NY (Alps)	\$744.90	ck# 9207	\$744.90
	12/12/16	The Old Homestead	DB to NY (Alps)	\$1,056.75	ck# 9207	\$1,056.75
	12/12/16	Sparks Steak House	DB to NY (Alps)	\$719.69	ck# 9207	\$719.69
						\$0.00
						\$0.00
					Travel-Meals Total	\$2,748.57
Travel - Misc:						
	12/11/16	Four Season Limousin	Taxi - DB to NY (Alps)	\$249.00	ck# 9207	\$249.00
	12/12/16	NYCTaxi	Taxi - KBR to NY (Alps)	\$11.80	ck# 9207	\$11.80
	12/12/16	NYCTaxi	Taxi - KBR to NY (Alps)	\$9.80	ck# 9207	\$9.80
	12/12/16	NYCTaxi	Taxi - KBR to NY (Alps)	\$13.80	ck# 9207	\$13.80
	12/13/16	Four Season Limousin	Taxi - DB to NY (Alps)	\$249.00	ck# 9207	\$249.00
						\$0.00
						\$0.00
					Travel-Misc Total	\$533.40

MISC.

Transportation

Phone:						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Phone Total	\$0.00
Research:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Research Total	\$0.00
Witness Fee:						\$0.00
						\$0.00
						\$0.00
					Witness Total	\$0.00
Shipping						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Shipping Total	\$0.00
Misc.:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Misc Total	\$0.00
					GRAND TOTAL	\$8,432.12
SUB-TOTALS						
Filing Fees:	\$0.00					
Records/Reports:	\$0.00					
Court Reporter:	\$0.00					
Copies:	\$0.00					
Postage:	\$0.00					
Expert:	\$0.00					
Travel - Air:	\$1,826.20					
Travel - Lodging:	\$3,323.95					
Travel - Meals:	\$2,748.57					
Travel - Misc:	\$533.40					
Phone:	\$0.00					
Research:	\$0.00					
Witness Fee:	\$0.00					
Shipping	\$0.00					
Misc Total:	\$0.00					
GRAND TOTAL	\$8,432.12					

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- Fuel Injection Systems
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☐ Occupant Safety Systems
- ☐ Alternators
- ☐ Radiators

- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Wire Harness

- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

Firm Name: Barrett Law Group, PAQuarter Beginning: January 2017Quarter Ending: March 2017

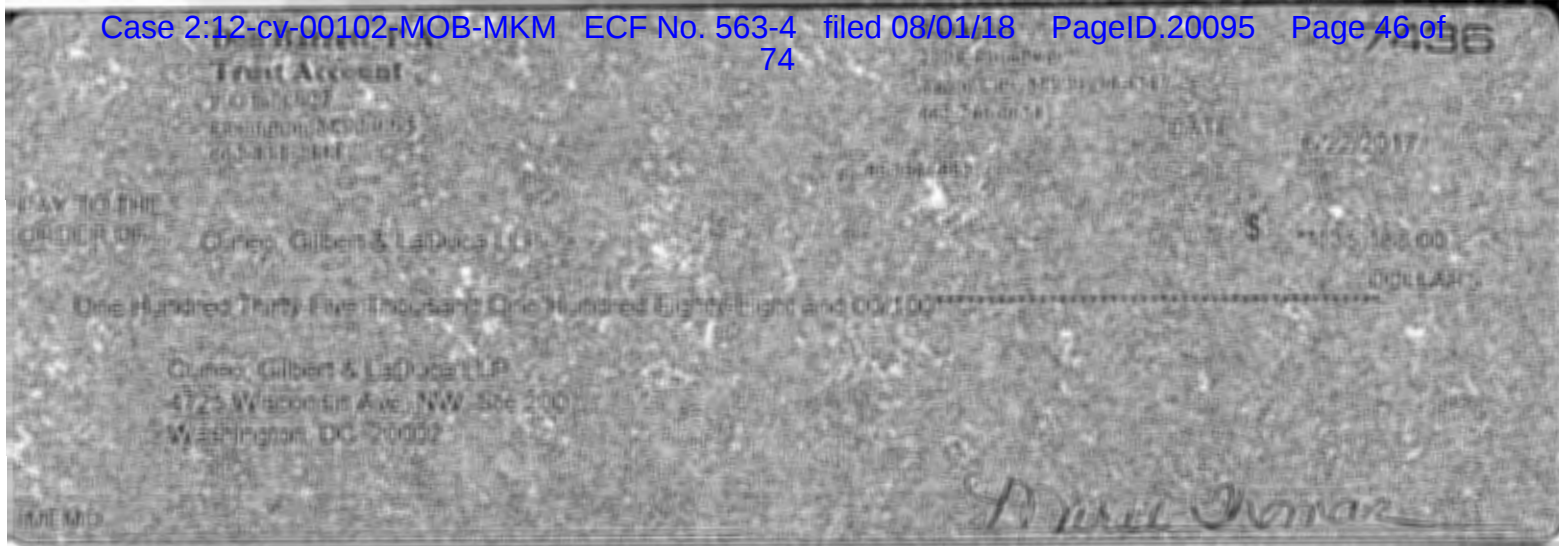
DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transpotation (includes mileage reimbursement)		\$0.00
Airfare	\$7,143.20	\$7,143.20
Train Fare		\$0.00
Cabs		\$0.00
Other Local Transportation		\$0.00
Travel - Meals	\$738.70	\$738.70
Travel - Miscellaneous (Lodging)	\$2,706.63	\$2,706.63
Federal Express, Local Courier, etc.		\$0.00
Postage Charges		\$0.00
Long Distance		\$0.00
In-House Photocopying		\$0.00
Outside Photocopying		\$0.00
Court Fees (filing, etc.)		\$0.00
Professional Fees		\$0.00
Witness/Service Fees		\$0.00
Court Reporter/Transcripts		\$0.00
Computer Research		\$0.00
Miscellaneous (Describe)		\$0.00
		\$0.00
CURRENT TOTAL	\$10,588.53	\$10,588.53

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

Don Barrett
Signed:

18-Apr-17
Date:

						\$0.00
					Travel-Meals Total	\$738.70
Travel - Misc:	02/01/17	Four Seasons	DB travel to NY - Bosch cab	\$145.00	ck# 9417	\$145.00
	02/23/17	NYC Taxi	DB travel to NY - Mitsuba	\$21.80	ck# 9481	\$21.80
	02/23/17	Lydia Taxi Service	DB travel to NY - Mitsuba	\$37.70	ck# 9481	\$37.70
	02/23/17	Unique II Worldwide	DB travel to NY - Mitsuba	\$466.08	ck# 9481	\$466.08
	02/23/17	Unique II Worldwide	DB travel to NY - Mitsuba	\$466.08	ck# 9481	\$466.08
	02/25/17	Unique II Worldwide	DB travel to NY - Mitsuba	\$220.38	ck# 9481	\$220.38
						\$0.00
						\$0.00
						\$0.00
					Travel-Misc Total	\$1,357.04
Phone:						
						\$0.00
					Phone Total	\$0.00
Research:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Research Total	\$0.00
Witness Fee:						\$0.00
						\$0.00
						\$0.00
					Witness Total	\$0.00
Shipping						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Shipping Total	\$0.00
Misc.:						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
						\$0.00
					Misc Total	\$0.00
					GRAND TOTAL	\$10,588.53
SUB-TOTALS						
Filing Fees:	\$0.00					
Records/Reports:	\$0.00					
Court Reporter:	\$0.00					
Copies:	\$0.00					
Postage:	\$0.00					
Expert:	\$0.00					
Travel - Air:	\$7,143.20					
Travel - Lodging:	\$1,349.59					
Travel - Meals:	\$738.70					
Travel - Misc:	\$1,357.04					
Phone:	\$0.00					
Witness Fee:	\$0.00					
Shipping	\$0.00					
Misc Total:	\$0.00					
GRAND TOTAL	\$10,588.53					



⑈ 7436 ⑈

Don Barrett, P.A.

7436

Cuneo, Gilbert & LaDuca LLP

6/22/2017

215 · Trust Account Liability	Auto - Heater Control - 08/2016	9,120.96
215 · Trust Account Liability	Auto - Electronic Powered 08/2016	1,166.71
215 · Trust Account Liability	Auto - Windshield Wipers 08/2016	103.38
215 · Trust Account Liability	Auto - Radiators 08/2016	30.35
215 · Trust Account Liability	Air Conditioning 08/2016	13.48
215 · Trust Account Liability	Fuel Injection 08/2016	124.36
215 · Trust Account Liability	Bearings 08/2016, 4th Quarter 2016; 1st 2017	14,944.55
215 · Trust Account Liability	Auto General 08/2016; 4th 2016; 1st Quarter 2017	103,018.43
215 · Trust Account Liability	Anti Vibration 08/2016, 4th 2016; 1st 2017	6,665.78

BankPlus Trust/IOLTA

135,188.00

Don Barrett, P.A.

7436

Cuneo, Gilbert & LaDuca LLP

6/22/2017

215 · Trust Account Liability	Auto - Heater Control - 08/2016	9,120.96
215 · Trust Account Liability	Auto - Electronic Powered 08/2016	1,166.71
215 · Trust Account Liability	Auto - Windshield Wipers 08/2016	103.38
215 · Trust Account Liability	Auto - Radiators 08/2016	30.35
215 · Trust Account Liability	Air Conditioning 08/2016	13.48
215 · Trust Account Liability	Fuel Injection 08/2016	124.36
215 · Trust Account Liability	Bearings 08/2016, 4th Quarter 2016; 1st 2017	14,944.55
215 · Trust Account Liability	Auto General 08/2016; 4th 2016; 1st Quarter 2017	103,018.43
215 · Trust Account Liability	Anti Vibration 08/2016, 4th 2016; 1st 2017	6,665.78

BankPlus Trust/IOLTA

135,188.00

	Cuneo	Auto Expenses		
Heater Control Panels				
	Inception - 8/2016			\$9,120.96
Electronic Powered Steering Assem.				
	Inception - 8/2016			\$1,166.71
Windshield Wipers				
	Inception - 08/2016			\$103.38
Radiators				
	Inception - 08/2016			\$30.35
Air Conditioning Systems				
	Inception - 08/2016			\$13.48
Fuel Injection Systems				
	Inception - 08/2016			\$124.36
Bearings				
	Inception - 08/2016		\$11,405.20	
	4th Quarter 2016		\$3,539.35	
	1st Quarter 2017		\$0.00	
			\$14,944.55	\$14,944.55
Auto General				
	Inception - 08/2016		\$28,405.74	
	4th Quarter 2016		\$49,350.00	
	1st Quarter 2017		\$25,262.69	
			\$103,018.43	\$103,018.43
Anti Vibration				
	Inception - 08/2016		\$2,245.97	
	4th Quarter 2016		\$2,524.07	
	1st Quarter 2017		\$1,895.74	
			\$6,665.78	\$6,665.78
			Total	\$135,188.00

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Heater Control Panels
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		\$623.05
Train Fare		\$426.66
Cabs		\$395.49
Other Local Transportation		
Travel - Meals		\$550.61
Travel - Miscellaneous (Lodging)		\$1,051.05
Federal Express, Local Courier, etc.		\$116.80
Postage Charges		\$2.72
Long Distance		\$52.17
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		\$192.00
Professional Fees		\$166.67
Witness/Service Fees		\$375.00
Court Reporter/Transcripts		\$13.65
Computer Research		\$450.09
Miscellaneous (Translation)		\$4,705.00
CURRENT TOTAL	\$0.00	\$9,120.96

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- | | | |
|--|---|---|
| <input type="checkbox"/> Wire Harness | <input type="checkbox"/> Motor Generators | <input type="checkbox"/> Starters |
| <input type="checkbox"/> Instrument Panel Clusters | <input type="checkbox"/> Steering Angle Sensors | <input type="checkbox"/> Switches |
| <input type="checkbox"/> Fuel Senders | <input type="checkbox"/> HID Ballasts | <input type="checkbox"/> Ignition Coils |
| <input checked="" type="checkbox"/> Electronic Powered Steering Assemblies | <input type="checkbox"/> Inverters | <input type="checkbox"/> ATF Warmers |
| <input type="checkbox"/> Alternators | <input type="checkbox"/> Air Flow Meters | <input type="checkbox"/> Valve Timing Control Devices |
| <input type="checkbox"/> Radiators | <input type="checkbox"/> Fuel Injection Systems | <input type="checkbox"/> Electronic Throttle Bodies |

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		
Train Fare		\$193.00
Cabs		\$46.80
Other Local Transportation		
Travel - Meals		
Travel - Miscellaneous (Lodging)		\$924.84
Federal Express, Local Courier, etc.		
Postage Charges		
Long Distance		\$2.07
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	\$0.00	\$1,166.71

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.



06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- | | | |
|---|---|---|
| <input type="checkbox"/> Wire Harness | <input type="checkbox"/> Motor Generators | <input type="checkbox"/> Starters |
| <input type="checkbox"/> Instrument Panel Clusters | <input type="checkbox"/> Steering Angle Sensors | <input type="checkbox"/> Switches |
| <input type="checkbox"/> Fuel Senders | <input type="checkbox"/> HID Ballasts | <input type="checkbox"/> Ignition Coils |
| <input checked="" type="checkbox"/> Windshield Wipers | <input type="checkbox"/> Inverters | <input type="checkbox"/> ATF Warmers |
| <input type="checkbox"/> Alternators | <input type="checkbox"/> Air Flow Meters | <input type="checkbox"/> Valve Timing Control Devices |
| <input type="checkbox"/> Radiators | <input type="checkbox"/> Fuel Injection Systems | <input type="checkbox"/> Electronic Throttle Bodies |

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation (includes mileage reimbursement)		
Airfare		
Train Fare		
Cabs		\$11.63
Other Local Transportation		
Travel - Meals		\$24.89
Travel - Miscellaneous (Lodging)		
Federal Express, Local Courier, etc.		
Postage Charges		
Long Distance		
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		\$66.86
Miscellaneous (Translation)		
CURRENT TOTAL	\$0.00	\$103.38

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☐ Occupant Safety Systems
☐ Alternators
☒ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		
Train Fare		
Cabs		\$16.35
Other Local Transportation		
Travel - Meals		
Travel - Miscellaneous (Lodging)		
Federal Express, Local Courier, etc.		
Postage Charges		
Long Distance		
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		\$14.00
Miscellaneous (Describe)		
CURRENT TOTAL	\$0.00	\$30.35

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Air Conditioning Systems
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		
Train Fare		
Cabs		
Other Local Transportation		
Travel - Meals		\$10.00
Travel - Miscellaneous (Lodging)		
Federal Express, Local Courier, etc.		
Postage Charges		
Long Distance		\$3.48
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	\$0.00	\$13.48

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☐ Occupant Safety Systems
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		
Train Fare		
Cabs		\$13.75
Other Local Transportation		
Travel - Meals		\$110.61
Travel - Miscellaneous (Lodging)		
Federal Express, Local Courier, etc.		
Postage Charges		
Long Distance		
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	\$0.00	\$124.36

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Bearings
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception through August 31, 2016 Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation (includes mileage reimbursement)		
Airfare		\$1,658.62
Train Fare		\$2,112.00
Cabs		\$1,529.14
Other Local Transportation		
Travel - Meals		\$1,797.79
Travel - Miscellaneous (Lodging)		\$3,502.50
Federal Express, Local Courier, etc.		\$69.47
Postage Charges		
Long Distance		\$65.93
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		\$105.30
Computer Research		\$564.45
Miscellaneous (Translation)		
CURRENT TOTAL	\$0.00	\$11,405.20

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Bearings
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: September 1, 2016

Quarter Ending: December 31, 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare	\$2,270.68	\$3,929.30
Train Fare		\$2,112.00
Cabs	\$419.17	\$1,948.31
Other Local Transportation		
Travel - Meals	\$248.97	\$2,046.76
Travel - Miscellaneous (Lodging)	\$485.52	\$3,988.02
Federal Express, Local Courier, etc.	\$83.31	\$152.78
Postage Charges		
Long Distance		\$65.93
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		\$105.30
Computer Research	\$31.70	\$596.15
Miscellaneous (Translation)		
CURRENT TOTAL	\$3,539.35	\$14,944.55

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- | | | |
|--|---|---|
| <input type="checkbox"/> Wire Harness | <input type="checkbox"/> Motor Generators | <input type="checkbox"/> Starters |
| <input type="checkbox"/> Instrument Panel Clusters | <input type="checkbox"/> Steering Angle Sensors | <input type="checkbox"/> Switches |
| <input type="checkbox"/> Fuel Senders | <input type="checkbox"/> HID Ballasts | <input type="checkbox"/> Ignition Coils |
| <input checked="" type="checkbox"/> Bearings | <input type="checkbox"/> Inverters | <input type="checkbox"/> ATF Warmers |
| <input type="checkbox"/> Alternators | <input type="checkbox"/> Air Flow Meters | <input type="checkbox"/> Valve Timing Control Devices |
| <input type="checkbox"/> Radiators | <input type="checkbox"/> Fuel Injection Systems | <input type="checkbox"/> Electronic Throttle Bodies |

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: January 1, 2017

Quarter Ending: March 31, 2017

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		\$3,929.30
Train Fare		\$2,112.00
Cabs		\$1,948.31
Other Local Transportation		
Travel - Meals		\$2,046.76
Travel - Miscellaneous (Lodging)		\$3,988.02
Federal Express, Local Courier, etc.		\$152.78
Postage Charges		
Long Distance		\$65.93
In-House Photocopying		
Outside Photocopying		
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		\$105.30
Computer Research		\$596.15
Miscellaneous (Translation)		
CURRENT TOTAL	\$0.00	\$14,944.55

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidellnes and applicable only to cases for which the Court has granted a reimbursement fund.



06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☒ Auto Parts General
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☐ Occupant Safety Systems
- ☐ Alternators
- ☐ Radiators

- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Fuel Injection Systems

- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Inception thru August 31, 2016

Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare		\$5,076.08
Train Fare		\$1,761.00
Cabs		\$2,179.32
Other Local Transportation		
Travel - Meals		\$4,465.49
Travel - Miscellaneous (Lodging)		\$9,889.06
Federal Express, Local Courier, etc.		\$780.94
Postage Charges		\$16.13
Long Distance		\$1,421.57
In-House Photocopying		
Outside Photocopying		\$981.25
Court Fees (filing, etc.)		
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		\$121.50
Computer Research		\$1,713.40
Miscellaneous (Describe)		
CURRENT TOTAL	\$0.00	\$28,405.74

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO 06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☒ Auto Parts General
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☐ Occupant Safety Systems
- ☐ Alternators
- ☐ Radiators

- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Fuel Injection Systems

- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: September 1, 2016

Quarter Ending: December 31, 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transpotation (includes mileage reimbursement)		
Airfare	\$11,782.09	\$16,858.17
Train Fare	\$1,610.90	\$3,371.90
Cabs	\$2,930.84	\$5,110.16
Other Local Transportation		
Travel - Meals	\$7,723.27	\$12,188.76
Travel - Miscellaneous (Lodging)	\$18,719.17	\$28,608.23
Federal Express, Local Courier, etc.	\$2,982.71	\$3,763.65
Postage Charges	\$0.47	\$16.60
Long Distance	\$253.28	\$1,674.85
In-House Photocopying		
Outside Photocopying	\$150.30	\$1,131.55
Court Fees (filing, etc.)	\$511.00	\$511.00
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts	\$747.95	\$869.45
Computer Research	\$1,938.02	\$3,651.42
Miscellaneous (Describe)		
CURRENT TOTAL	\$49,350.00	\$77,755.74

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO 06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Auto Parts General
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Jan 1, 2017

Quarter Ending: Mar 31, 2017

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation (Includes mileage reimbursement)		
Airfare	\$4,208.40	\$21,066.57
Train Fare	\$1,817.00	\$5,188.90
Cabs	\$2,583.04	\$7,693.20
Other Local Transportation		
Travel - Meals	\$3,009.92	\$15,198.68
Travel - Miscellaneous (Lodging)	\$6,645.01	\$35,253.24
Federal Express, Local Courier, etc.	\$1,330.51	\$5,094.16
Postage Charges		\$16.60
Long Distance	\$853.01	\$2,527.86
In-House Photocopying		
Outside Photocopying	\$63.22	\$1,194.77
Court Fees (filing, etc.)		\$511.00
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		\$869.45
Computer Research	\$4,752.58	\$8,404.00
Miscellaneous (Translation)		
CURRENT TOTAL	\$25,262.69	\$103,018.43

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Anti Vibration Ruber Pads
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: **Cuneo Gilbert & LaDuca, LLP**

Quarter Beginning: Inception through August 31, 2016

Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transpotation (includes mileage reimbursement)		
Airfare		\$579.79
Train Fare		
Cabs		\$233.60
Other Local Transportation		
Travel - Meals		\$494.30
Travel - Miscellaneous (Lodging)		\$645.87
Federal Express, Local Courier, etc.		\$40.87
Postage Charges		
Long Distance		\$6.15
In-House Photocopying		
Outside Photocopying		\$164.83
Court Fees (filing, etc.)		\$9.50
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		\$71.06
Miscellaneous (Translation)		
CURRENT TOTAL	\$0.00	\$2,245.97

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO

06/14/2017

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- ☐ Wire Harness
☐ Instrument Panel Clusters
☐ Fuel Senders
☒ Anti Vibration Rubber Pads
☐ Alternators
☐ Radiators

- ☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems

- ☐ Starters
☐ Switches
☐ Ignition Coils
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning: Sep 2016 to Dec 31, 2016

Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transproation (includes mileage reimbursement)		
Airfare	\$426.20	\$1,005.99
Train Fare	\$572.00	\$572.00
Cabs	\$391.47	\$625.07
Other Local Transportation		
Travel - Meals	\$493.06	\$987.36
Travel - Miscellaneous (Lodging)	\$558.02	\$1,203.89
Federal Express, Local Courier, etc.	\$83.32	\$124.19
Postage Charges		
Long Distance		\$6.15
In-House Photocopying		
Outside Photocopying		\$164.83
Court Fees (filing, etc.)		\$9.50
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		\$71.06
Miscellaneous (Translation)		
CURRENT TOTAL	\$2,524.07	\$4,770.04

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN G. CUNEO

06/14/2017

- ☐ Wire Harness
- ☐ Instrument Panel Clusters
- ☐ Fuel Senders
- ☒ Anti Vibration Rubber Pads
- ☐ Alternators
- ☐ Radiators

- ☐ Motor Generators
- ☐ Steering Angle Sensors
- ☐ HID Ballasts
- ☐ Inverters
- ☐ Air Flow Meters
- ☐ Fuel Injection Systems

- ☐ Starters
- ☐ Switches
- ☐ Ignition Coils
- ☐ ATF Warmers
- ☐ Valve Timing Control Devices
- ☐ Electronic Throttle Bodies

Firm Name: **Cuneo Gilbert & LaDuca, LLP**

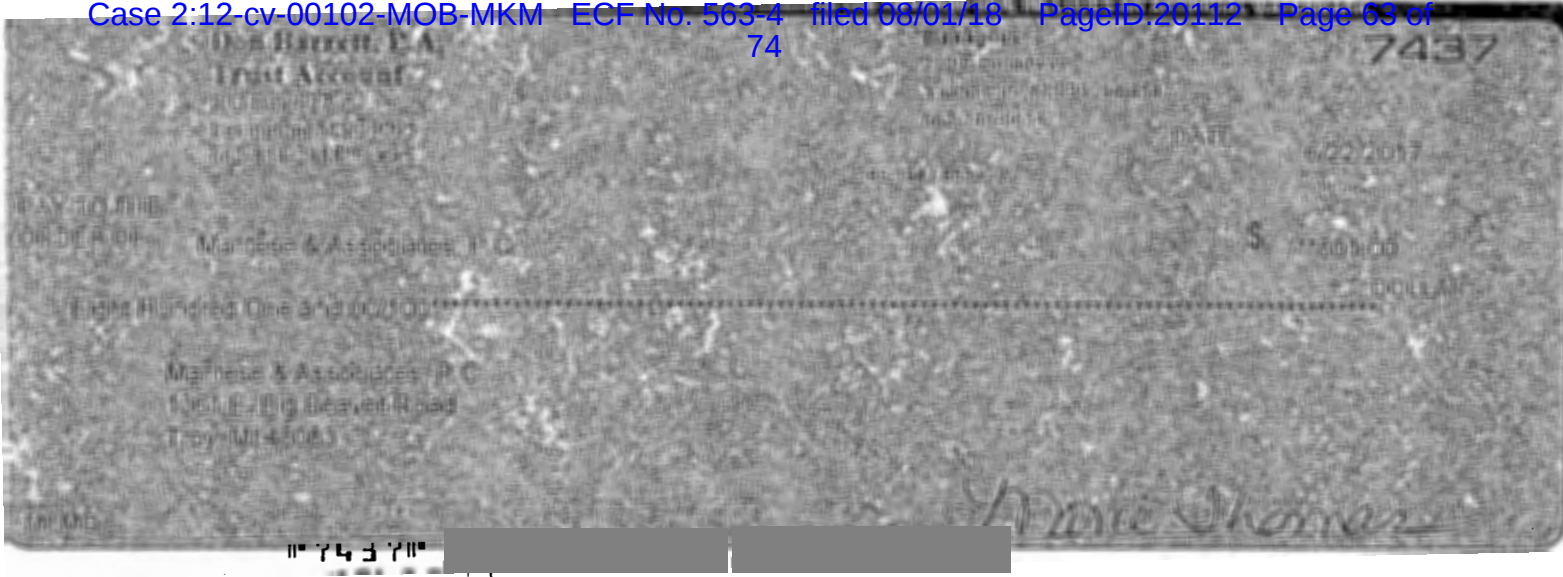
Quarter Beginning: Jan 1, 2017

Quarter Ending: Mar 31, 2017

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation (includes mileage reimbursement)		
Airfare		\$1,005.99
Train Fare	\$328.00	\$900.00
Cabs	\$128.57	\$753.64
Other Local Transportation		
Travel - Meals	\$289.18	\$1,276.54
Travel - Miscellaneous (Lodging)	\$1,149.99	\$2,353.88
Federal Express, Local Courier, etc.		\$124.19
Postage Charges		
Long Distance		\$6.15
In-House Photocopying		
Outside Photocopying		\$164.83
Court Fees (filing, etc.)		\$9.50
Professional Fees		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		\$71.06
Miscellaneous (Translation)		
CURRENT TOTAL	\$1,895.74	\$6,665.78

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

JONATHAN W. CUNEO 06/14/2017



Don Barrett, P.A.

7437

Mantese & Associates, P.C.
215 - Trust Account Liability

Auto - 4th Quarter 2016

6/22/2017

801.00

BankPlus Trust/IOLTA

801.00

Don Barrett, P.A.

7437

Mantese & Associates, P.C.
215 - Trust Account Liability

Auto - 4th Quarter 2016

6/22/2017

801.00

BankPlus Trust/IOLTA

801.00

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

Wire Harness
Instrument Panel Clusters
Fuel Senders
Occupant Safety Systems
Alternators
Radiators
Starters
Switches
Ignition Coils

☐ Motor Generators
☐ Steering Angle Sensors
☐ HID Ballasts
☐ Inverters
☐ Air Flow Meters
☐ Fuel Injection Systems
☐ ATF Warmers
☐ Valve Timing Control Devices
☐ Electronic Throttle Bodies

Firm Name:

Mantese Honigman, PC

Quarter Beginning

10-1-16

Quarter Ending

12-31-16

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	
Train Fare	
Cabs	
Other Local Transportation	
Travel - Meals	
Travel - Miscellaneous	
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Court Fees (filing, etc.)	800.00
Professional Fees	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	1.00
Miscellaneous (Describe)	
CURRENT TOTAL	801.00 500.00

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

Brandon R. Res
Signed:

1-16-17
Date:

1/16/2017
10:19 AMMantese Honigman, P.C.
Slip Listing

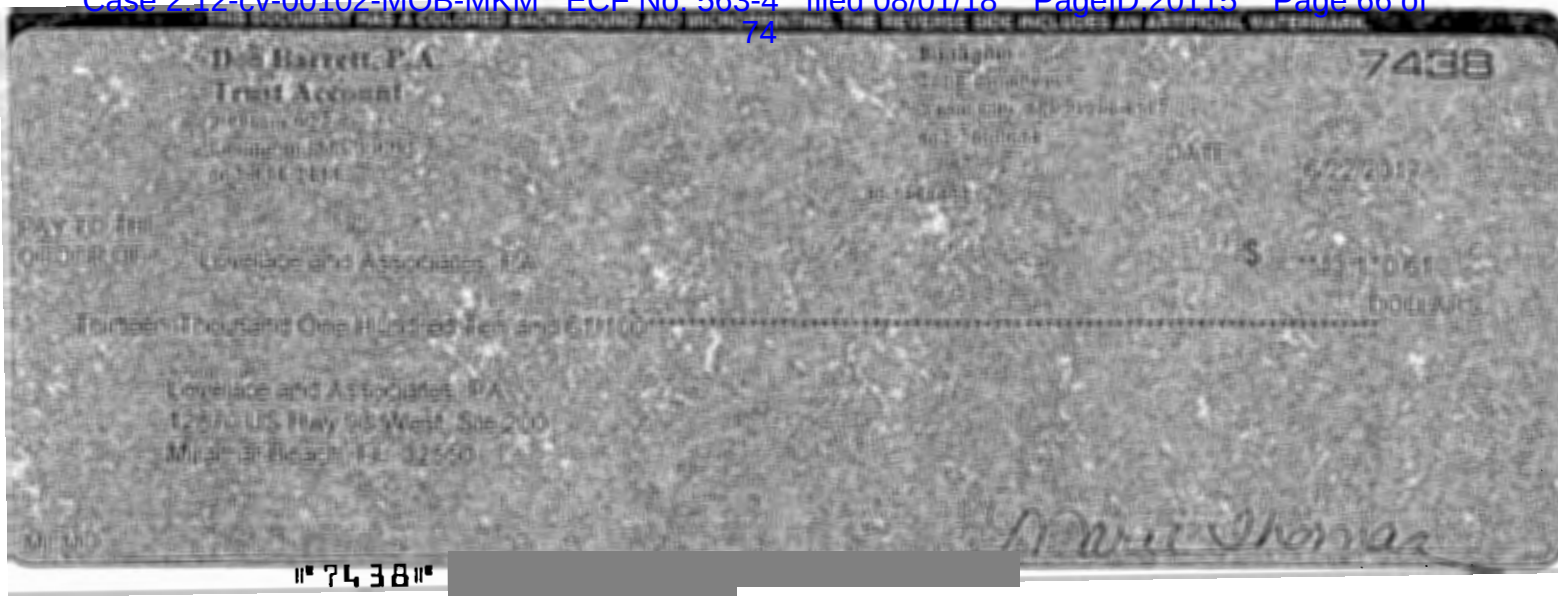
Page 1

Selection Criteria

Slip.Transaction Dat Clie.Selection	10/1/2016 - 12/31/2016 Include: Auto - ATF Warm; Auto - Air Flow; Auto - Alternat; Auto - Fuel Inj; Auto - Fuel Sen; Auto - HID Ball; Auto - Ign Coil; Auto - Instrume; Auto - Inverter; Auto - Motor Ge; Auto - Occupant; Auto - Radiator; Auto - Starters; Auto - Steering; Auto - Switches; Auto - Throttle; Auto - Valve Ti; Wire Hamess
Acti.Selection	Include: Assessment Fee; CONVERTED EXP; Copying; Deposition; Facsimile; Fed Ex; Filing fees; Long distance; Meals; Messenger; Mileage; Misc.materials; Parking; Postage; Process Server; Research; Transcript; Travel Expense; Westlaw; Witness fees; expert; medical copies

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description		User Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
282255 10/1/2016 WIP Pacer charges for third quarter	EXP	GVM Research Auto - Radiator	1	1.00	1.00
282114 10/5/2016 WIP Filing fees	EXP	GVM Filing fees Auto - Alternat	1	400.00	400.00
282113 10/6/2016 WIP Filing fees	EXP	GVM Filing fees Auto - Starters	1	400.00	400.00
Grand Total		Billable Unbillable Total	0.00 0.00 0.00		801.00 0.00 801.00



Don Barrett, P.A.

7438

Lovelace and Associates, PA
215 - Trust Account Liability

Auto - 1st Quarter 2017

6/22/2017

13,110.61

BankPlus Trust/IOLTA

13,110.61

Don Barrett, P.A.

7438

Lovelace and Associates, PA
215 - Trust Account Liability

Auto - 1st Quarter 2017

6/22/2017

13,110.61

BankPlus Trust/IOLTA

13,110.61

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

- | | |
|--|---|
| <input checked="" type="checkbox"/> Wire Harness | <input type="checkbox"/> Motor Generators |
| <input type="checkbox"/> Instrument Panel Clusters | <input type="checkbox"/> Steering Angle Sensors |
| <input type="checkbox"/> Fuel Senders | <input type="checkbox"/> HID Ballasts |
| <input type="checkbox"/> Occupant Safety Systems | <input type="checkbox"/> Inverters |
| <input type="checkbox"/> Alternators | <input type="checkbox"/> Air Flow Meters |
| <input type="checkbox"/> Radiators | <input type="checkbox"/> Fuel Injection Systems |
| <input type="checkbox"/> Starters | <input type="checkbox"/> ATF Warmers |
| <input type="checkbox"/> Switches | <input type="checkbox"/> Valve Timing Control Devices |
| <input type="checkbox"/> Ignition Coils | <input type="checkbox"/> Electronic Throttle Bodies |

Firm Name: Lovelace and Associates, P.A.

Quarter Beginning January 2017 Quarter Ending March 2017

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	\$4,396.44
Train Fare	
Cabs	
Other Local Transportation	831.38
Travel – Meals	2,408.84
Travel – Hotel	4,624.46
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	194.75
In-House Photocopying	391.75
Outside Photocopying	
Court Fees (filing, etc.)	
Professional Fees (Document Review Temps)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	262.99
CURRENT TOTAL	\$13,110.61

I hereby certify that the expenses that I claim for my firm are consistent with the April 14, 2016 guidelines and applicable only to cases for which the Court has granted a reimbursement fund.

Dom W
Signed:

6-1-17
Date:

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

Don Barrett, P.A. Trust Account P.O. Box 927 Lexington, MS 39095 662-834-2488	Bankplus 210 E Broadway Yazoo City, MS 39194-4547 662-746-0654	7613
DATE		3/29/2018
85-194 / 653		
PAY TO THE ORDER OF	Thrash Law Firm	\$ 4,403.54
Four Thousand Four Hundred Three and 54/100		DOLLARS
Thrash Law Firm 1101 Garland Street Little Rock, AR 72201		
MEMO	<i>Maria Thomas</i>	

7613

Don Barrett, P.A.

7613

Thrash Law Firm
215 · Trust Account Liability

2nd, 3rd, & 4th Quarter 2017 Ct #2

3/29/2018

4,403.54

BankPlus Trust/IOLTA

4,403.54

Don Barrett, P.A.

7613

Thrash Law Firm
215 · Trust Account Liability

2nd, 3rd, & 4th Quarter 2017 Ct #2

3/29/2018

4,403.54

BankPlus Trust/IOLTA

4,403.54

EXPENSE SUMMARY

Quarter 2 - \$2,613.71

5/4/17	Southwest (Auto Parts - AVRP)	\$496.96
5/5/17	Southwest (Auto Parts - AVRP)	\$332.97
5/19/17	Taxi (Auto Parts - AVRP)	\$45.62
5/17/17	Taxi (Auto Parts - AVRP)	\$44.60
5/21/17	Clinton Airport Parking (Auto Parts - AVRP)	\$1.09
5/17/17	Clinton Airport Parking (Auto Parts - AVRP)	\$32.70
5/19/17	Vino Volo (Meal - Auto Parts/AVRP)	\$38.63
5/19/17	Café 37 (Meal - Auto Parts/AVRP)	\$1.73
5/15/17	Southwest (Auto Parts - AVRP)	\$411.96
5/17/17	Cantina Laredo (Auto Parts - AVRP)	\$27.31
5/17/17	Taxi (Auto Parts - AVRP)	\$44.60
5/19/17	Vino Volo (Auto Parts - AVRP)	\$38.63
5/19/17	Hyatt Hotel (Auto Parts - AVRP)	\$850.37
5/19/17	Café Chicago (Auto Parts - AVRP)	\$1.73
5/19/17	Taxi (Auto Parts - AVRP)	\$45.62
5/20/17	Clinton Airport Parking (Auto Parts - AVRP)	\$32.70
5/20/17	Clinton Airport (Auto Parts - AVRP)	\$1.09
6/30/17	Photocopies - 827 BW Copies @ \$0.20 per copy	\$165.40

Quarter 3 - \$69.80

9/30/17	Photocopies - 349 BW Copies @ \$0.20 per copy	\$69.80
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Quarter 4 - \$1,720.03

12/19/17	FedEx (Auto Parts - General)	\$97.43
12/20/17	Taxi (Auto Parts HCP)	\$20.81
12/14/17	United Airlines (Auto Parts HCP)	\$282.20
12/19/17	United Airlines (Auto Parts HCP)	\$25.00
12/19/17	Taxi (Auto Parts HCP)	\$45.00
12/19/17	Taxi (Auto Parts HCP)	\$18.60
12/18/17	Taxi (Auto Parts HCP)	\$45.00
12/16/17	United Airlines (Auto Parts HCP)	\$257.20
12/20/17	Southwest (Auto Parts HCP)	\$242.79
12/18/17	Grand Hyatt In Room Dining (Meal - Auto Parts HCP)	\$65.63
12/17/17	Grand Hyatt In Room Dining (Meal - Auto Parts HCP)	\$33.68
12/20/17	Grand Hyatt (Auto Parts HCP)	\$411.49
12/23/17	Clinton Airport (Parking - Auto Parts HCP)	\$21.80
12/31/17	Photocopies - 349 BW Copies @ \$0.20 per copy	\$153.40

TOTAL EXPENSES (Q2, Q3, Q4 (2017))

\$4,403.54

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: HCP

Reporting Period: October 1, 2017 – December 31, 2017

Handwritten: 4/11/18
Quarter 2017

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	\$1369.89
Long Distance Telephone Expense	\$
Meals	\$99.31
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$1469.20

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: General

Reporting Period: October 1, 2017 – December 31, 2017

*3rd
Quarter
2017*

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers (FedEx)	\$97.43
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 (767 BW Copies)	\$153.40
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$250.83

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: General

Reporting Period: April 1, 2017 – June 30, 2017

2nd Quarter 2017

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	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense (827 BW Copies)	\$165.40
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$165.40

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: General

Reporting Period: July 1, 2017 – September 30, 2018

Disbursement	Total Amount To Date
Arbitrators/Mediators	\$
Court Fees	\$
Delivery Services/Messengers (FedEx)	\$
Deposition / Court Transcripts	\$
Experts	\$
In-House Postage Expense	\$
Litigation Support Vendors	\$
Local Counsel	\$
Travel	\$
Long Distance Telephone Expense	\$
Meals	\$
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense (349 BW Copies)	\$69.80
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$69.80

In Re: Auto Parts Antitrust Litigation

MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: Thrash Law Firm, P.A.

Case: AVRP

Reporting Period: April 1, 2017 – June 30, 2017

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	\$2340.28
Long Distance Telephone Expense	\$
Meals	\$108.03
Online Research	\$
Other	\$
Temporary Professionals	\$
Document / Database Hosting	\$
Outside Printing	\$
Photocopy Expense	\$
Subpoena Fees	\$
Trial Transcripts	\$
Witness Fees	\$
TOTAL	\$2448.31