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

IN RE AUTOMOTIVE PARTS ANTITTRUST LITIGATION	:	Master File No. 12-md-02311
	:	Honorable Marianne O. Battani
	:	
In Re: Wire Harness	:	Case No. 2:12-cv-00102
In Re: Instrument Panel Clusters	:	Case No. 2:12-cv-00202
In Re: Fuel Senders	:	Case No. 2:12-cv-00302
In Re: Heater Control Panels	:	Case No. 2:12-cv-00402
In Re: Bearings	:	Case No. 2:12-cv-00502
In Re: Alternators	:	Case No. 2:13-cv-00702
In Re: Anti Vibrational Rubber Parts	:	Case No. 2:13-cv-00803
In Re: Windshield Wiper Systems	:	Case No. 2:13-cv-00902
In Re: Radiators	:	Case No. 2:13-cv-01002
In Re: Starters	:	Case No. 2:13-cv-01102
In Re: Ignition Coils	:	Case No. 2:13-cv-01402
In Re: Motor Generators	:	Case No. 2:13-cv-01502
In Re: HID Ballasts	:	Case No. 2:13-cv-01702
In Re: Inverters	:	Case No. 2:13-cv-01802
In Re: Electronic Powered Steering Assemblies	:	Case No. 2:13-cv-01902
In Re: Air Flow Meters	:	Case No. 2:13-cv-02002
In Re: Fan Motors	:	Case No. 2:13-cv-02102
In Re: Fuel Injection Systems	:	Case No. 2:13-cv-02202
In Re: Power Window Motors	:	Case No. 2:13-cv-02302
In Re: Automatic Transmission Fluid Warmers	:	Case No. 2:13-cv-02402
In Re: Valve Timing Control Devices	:	Case No. 2:13-cv-02502
In Re: Electronic Throttle Bodies	:	Case No. 2:13-cv-02602
In Re: Air Conditioning Systems	:	Case No. 2:13-cv-02702
In Re: Windshield Washer Systems	:	Case No. 2:13-cv-02802
In Re: Spark Plugs	:	Case No. 2:15-cv-03002
In Re: Automotive Hoses	:	Case No. 2:15-cv-12893
In Re: Power Window Switches	:	Case No. 2:16-cv-03902
In Re: Ceramic Substrates	:	Case No. 2:16-cv-12194

THIS DOCUMENT RELATES TO
AUTOMOBILE DEALERSHIP ACTIONS

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

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: October 14, 2016

By: /s/ Gerard V. Mantese

Gerard V. Mantese (P34424)
Alexander E. Blum (P74070)
MANTESE HONIGMAN , P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203
Facsimile: (248) 457-9201
gmantese@manteselaw.com
ablum@mantesleaw.com

Interim Liaison Counsel for the Automobile Dealer Plaintiffs

Jonathan W. Cuneo
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave., NW
Suite 200
Washington, DC 20016
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
jonc@cuneolaw.com

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

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

Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs

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

Gerard V. Mantese (P34424)
Mantese Honigman, P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203
gmantese@manteselaw.com

Interim Liaison Counsel For The Automobile Dealer Plaintiffs

Jonathan W. Cuneo
Cuneo Gilbert & LaDuca, LLP
4725 Wisconsin Ave., NW
Suite 200
Washington, DC 20016
Telephone: (202) 789-3960
jonc@cuneolaw.com

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

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

Interim Co-Lead Counsel For The Automobile Dealer Plaintiffs

Statement of the Issues Presented

1. Should counsel for the Auto Dealers, who obtained nearly $125 million in this group of Auto Dealer class settlements, be awarded a portion of those settlements for attorneys' fees?

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

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

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 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

Persevering in this hard-fought litigation, counsel for the Auto Dealers have negotiated and presented a second group of settlements totaling nearly $125 million. While these settlements do not fully resolve the Auto Dealers' claims, they represent a substantial step forward: the settlements cover ten Defendant groups and 28 different parts. Like the first group of dealership settlements approved by the Court, these settlements also provide significant non-cash benefits, such as fulsome cooperation from the settling Defendants and injunctive relief prohibiting anti-competitive behavior. All of the net proceeds from the settlements will be paid to eligible new car automobile dealerships—unlike many class action settlements, there is no *cy pres* reversion to Defendants or third-party charities.

Auto Dealer counsel have zealously pursued this complex antitrust litigation and the Defendants have mounted aggressive defenses. Although Defendants' antitrust violations are indisputable, the Defendants have resolutely maintained that the Plaintiffs did not suffer an antitrust injury and that, even if they did, litigation classes cannot be certified. The settlements now before the Court provide substantial benefits to auto dealer class members and are remarkable in light of the Defendants' unflagging opposition.

Defendants have focused their discovery efforts on the Auto Dealer Plaintiffs and therefore the Court is familiar with much of the work done by counsel for the Auto Dealers. Responding to Defendants' nearly constant fusillade of discovery has required the Auto Dealers and their attorneys to devote an enormous amount of time and resources. Defendants have already taken well over 100 depositions of non-party Auto Dealers and continue to conduct the depositions of the class representatives.

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 involved in these settlements; (2) leave to set aside eight percent of the settlement funds for future litigation expenses; and (3) an award of attorneys' fees of $38,299,350 from the settlements (30.6% of the gross settlement proceeds). As discussed herein, the case law from the Sixth Circuit and other federal courts supports counsel's requests.

The Court has previously applied the "percentage-of-the-fund" approach for fees granted to the Plaintiff groups in this litigation. Counsel for the Auto Dealers again seek a fee award based on a percentage of the settlement funds that remain after the deduction of: (1) notice and administration costs, and (2) future litigation expenses. This approach is supported by Sixth Circuit precedent, *see Rawlings v. Prudential-Bache Properties, Inc.*, 9 F.3d 513, 516 (6th Cir. 1993), and the requested award 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). Finally, a lodestar cross-check confirms that the amount sought is reasonable in light of the work performed and the results achieved for the class members.

In this group of settlements, counsel for the Auto Dealers have recovered more than twice the amount approved by the Court in the first group of dealership settlements. Since the first group of settlements, counsel have continued to pursue the litigation vigorously; succeeded in motion practice; reviewed, analyzed, and coded hundreds of thousands of documents provided by the Defendants; obtained cooperation from certain Defendants; attended and defended numerous depositions; and negotiated beneficial settlements. Counsel for the Auto Dealers have substantially prosecuted dealership claims, all on a contingent fee basis.

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

The Department of Justice has described its investigation of the bid-rigging and price-fixing conspiracies at issue here as the largest criminal investigation it has ever undertaken. The DOJ has collected billions of dollars in fines from the Defendants. 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 list of settling and non-settling Defendants' includes well-known companies that are dominant players in their industries.

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, Yazaki Corp., *United States v. Yazaki Corp.*, No. 2:12-cr-20064 (E.D. Mich. 2012), ECF No. 6. Thus, without these franchised actions, automobile dealerships affected by the Defendants' conduct would have been left without a remedy unless they any of them decided to sue these more than 100 Defendants in an individual case.

Antitrust litigation is inherently risky, with high stakes, and the outcome of this litigation has been far from certain. From the outset, counsel for the Auto Dealers worked on a contingent basis to advance the claims of automobile dealerships authorized by OEMs to sell new vehicles. While working efficiently, they 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.

Since 2011, some of the attorneys for the Auto Dealers have worked nearly full-time on this litigation. It has been and will continue to be a huge undertaking as the cases progress through discovery, to class certification, and then to trial if necessary. Counsel for the Auto Dealers have performed the following work to advance these cases:

- 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 Department of Justice 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 100 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;
- 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;

- Attending MDL status conferences with Judge Battani;

- Preparing for, traveling to, and attending more than 100 depositions of third-party automobile dealerships and class representative dealerships;

- Preparing for, traveling to, and attending depositions of Defendants and their representatives;

- Performing all the tasks necessary to reach these settlements, including formulating demands, negotiating, in some cases mediation, dozens of in-person meetings, exchange of drafts, preparing escrow agreements;

- Drafting settlement agreements, preliminary approval motions, and in some cases attend and argue preliminary approval motions;

- Receiving cooperation materials from settling Defendants, attend in-person proffers from settling Defendants who disclose the details of the conspiracies, and review and analyze cooperation materials from settling Defendants and 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 have been the primary target of Defendants' discovery efforts and have responded to countless discovery requests relating to nearly every aspect of an automobile dealers' business. Counsel for the Auto Dealers have 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 all over 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' objection, the Defendants insisted on taking an unlimited number of depositions of non-party automobile dealerships. The Court granted the Defendants' request and Defendants have already taken more than 100 such depositions. 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. (Raiter Decl.)

Counsel for the Auto Dealers have also invested considerable time, effort, and money in the prosecution of discovery and liability claims against the Defendants. This work has included the

review, translation, and analysis of millions of pages of documents produced by the Defendants to the DOJ and to the Plaintiffs in this litigation. Counsel for the Auto Dealers have prepared the questioning and attended the depositions of Defendant representatives and have received numerous informal witness statements from cooperating and settling Defendants. Counsel for the Auto Dealers have 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 have worked with their experts in the preparation of the opinions and models that will be used to support class certification, damages, and at trial. (Raiter Decl.)

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

In this second round of settlements, the Auto Dealers seek final approval of settlements with 10 different Defendants and their affiliates. These settlements involve Auto Dealer claims covering 28 different parts and total $124,730,980. The Auto Dealer Settlements at issue in this motion are listed by Defendant and by part in Appendix A to this brief.

These settlements were reached after substantial litigation and were negotiated by experienced counsel. Some of the Defendants involved in these settlements had been 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.)

Argument

I. 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 has the discretion to select the appropriate method for calculating attorneys' fees "in light of the unique characteristics of class actions in general, and of the unique circumstances of the actual cases before them." *Rawlings*, 9 F.3d at 513, 516. In common fund cases, the award of attorneys' fees need only "be reasonable under the circumstances." *Rawlings*, 9 F.3d at 516. The court will then analyze and weigh the six factors described in *Ramey v. Cincinnati Enquirer, Inc.,* 508 F.2d 1188 (6th Cir. 1974); see also *Rawlings*, 9 F.3d at 516.

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

The Court allowed a portion of the proceeds from the first group of settlements to be used to fund some of the ongoing litigation expenses for the cases involved in those settlements. Nearly that entire fund has been depleted to fund ongoing litigation expenses for the cases involved in those settlements. (See Declaration of Marie Thomas). However, because some of the settlements in this second group relate to different parts / cases not involved in the first group of settlements, counsel for the Auto Dealers have funded the expenses required to advance the litigation for those cases. Having achieved the settlements currently before the Court, counsel for the Auto Dealers should be awarded the amount of the unreimbursed litigation expenses incurred in the settled cases for which a set aside expense fund was not previously established.

Auto Dealers also request that the Court authorize counsel to set aside eight percent of the current settlement proceeds to be used for future litigation expenses in the claims remaining

against the non-settling Defendants, to be used only in those cases / parts included in the current settlements. The requested amount to be set aside is $9,978,474.16, which would be deducted on a pro rata basis from the settlements. A table showing these deductions is set forth at Appendix B to this brief.

A. Reimbursement of Costs Already Incurred.

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).

The future litigation fund previously allowed by the Court totaled $2,947,395 and has been used to fund ongoing litigation expenses for the cases in the first group of settlements. That fund is nearly depleted following the payment of litigation expenses in those cases. (See Thomas Decl.). Counsel for the Auto Dealers have funded the expenses required to advance the litigation for the different parts / cases not involved in the first group of settlements and not reimbursed from the expense fund set aside from the first settlements. (Thomas Decl.; Raiter Decl.)

Counsel for the Auto Dealers should be returned the unreimbursed litigation expenses incurred to-date in the settled cases for which a set aside expense fund was not established. Counsel for the Auto Dealers have paid $450,046.88 in unreimbursed litigation expenses for the benefit of the settlement class members in those cases. (*See* Thomas Decl.; Raiter Decl.;

Declarations of Don Barrett, Jon Cuneo, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore). These costs included expenses related to experts, document gathering and production, domestic and international travel, and other reasonable litigation expenses. (*Id.*) These new unreimbursed expenses are properly awarded from this group of settlements and, in particular, from those settlements in the cases in which the costs were incurred.

B. Future Litigation Expenses.

Counsel for the Auto Dealers request that eight percent ($9,978,474) be set aside from these settlements and be used to pay future expenses only in cases in which the settlements before the Court have been reached. This 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% 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% of approximately $19 million

settlement fund for future litigation expenses).

The Auto Dealers have spent approximately $4.5 million in reasonable litigation expenses to-date.[1] The size and complexity of this litigation has already necessitated very significant expenses, as set forth above, and, as the 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 future cost of this work by their experts will be in the millions of dollars. (Raiter Decl.)

In addition, the Auto Dealers expect to incur significant costs related to ongoing discovery from dealerships, OEMs, and the Defendants and their representatives. These costs include the significant expense of hosting and reviewing documents and data, as well as travel expenses for the many depositions that have yet to be taken. (Raiter Decl.) Counsel for the Auto Dealers therefore believe that the amount they are requesting be set aside for future expenses is reasonable.[2]

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

The Court has settlements before it totaling approximately $125 million for the benefit of the Auto Dealers. Counsel for the Auto Dealers litigated these cases on a contingent basis, some for more than five years, and have spent thousands of hours in the cases in which settlements have been reached. Although the Court awarded fees from the first group of settlements, the work done by counsel for the Auto Dealers still exceeds the fees awarded. Counsel for the Auto Dealers request

[1] The Court previously awarded reimbursement of approximately $1.6 million in expenses that counsel for the Auto Dealers had advanced and allowed a fund of approximately $2.9 million for future expenses.

[2] Like their prior request for a future expense set aside, the Auto Dealers will use these funds for only the cases involved in this second group of settlements. Unspent money would be returned to the funds used to pay class member claims.

an interim award of attorneys' fees based on the work done to achieve these settlements, which includes work performed prior to the Auto Dealers' first group of settlements.

Fee awards for settlements like these 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 five 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 previously awarded fees in this litigation using the percentage-of-the-fund approach and counsel for the Auto Dealers believe that the same method should be applied to this second group of settlements. The courts in this Circuit have expressed a preference for 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.*, 08-MDL-01952, 2011 WL 6209188, at *16 (E.D. Mich. Dec. 13, 2011); *Delphi*, 248 F.R.D. at 502; *Cardinal*, 528 F. Supp. 2d at 762 (the Sixth Circuit has "explicitly approved the percentage approach in common fund cases"); *In re Skelaxin (Metaxalone) Antitrust Litig.*, 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 CD Antitrust Ltig.,* 218 F.R.D. 508, 532 (E.D. Mich. 2003) ("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 Invs., 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." *Id.* at 517; *see also* Manual for Complex Litigation (Third) § 24.12 at 189 (West 1995). There is a "'trend towards adoption of a percentage-of-the-fund method in [common fund] cases.'" *Delphi*, 248 F.R.D. at 502 (quoting *Rawlings*, 9 F.3d at 516-517).

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

The Court is well-versed with the complexity of this litigation; on just the cases at issue in these settlements, counsel for the Auto Dealers have worked for more than five years and have

dedicated more than 77,000 attorney hours and 11,000 hours for paralegals and law clerks.[3] Among other things, 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 have 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 one-third of the settlement funds remaining after the deduction of: (1) notice and administration costs, and (2) costs set aside for future litigation expenses.[4] Reasonable fee awards range from 20 to 50 per cent of the common fund. *In re Telectronics Pacing Sys., Inc., Accufix Atrial "J" Leads Prods. Liab. Litig.,* 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-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.*,

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

[4] 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."); *Delphi*, 248 F.R.D. at 505 (attorneys' fees awarded on gross settlement fund); *In re Cardizem CD Antitrust Litigation*, 218 F.R.D. at 531–535 (awarding costs in addition to percentage of the fund fee).

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").[5]

Fee awards of more than one-third are also common. *See*, *e.g.*, *In re Combustion, Inc.*, 968 F. Supp. 1116, 1133, 1142 (W.D. La. 1997) (awarding fee of 36 per cent and noting that "50 percent of the fund is the upper limit on a reasonable fee award from a common fund . . . . [D]istrict courts in

[5] 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 per cent 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 one-half of the settlement fund.") (citations omitted); *Moore v. United States*, 63 Fed. CI. 781, 787 (2005) ("one-third is a typical recovery").

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 per cent).

The one-third attorney fee (of the net proceeds) is also fair in 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 have worked nearly 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.)

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 indicate that the fee requested is fair.

1. Counsel Secured Valuable Benefits for Auto Dealers.

The result achieved for the class members is the principal consideration. *Delphi*, 248 F.R.D. at 503. As discussed in the memoranda filed in support of the preliminary approval of the settlements, counsel for the Auto Dealers have achieved excellent recoveries. These are cash

settlements coupled with meaningful cooperation and injunctive relief. The settlement funds totaling nearly $125 million represent a significant recovery for automobile dealerships that sell new vehicles in the indirect purchaser states.

After the deduction of fees, notice and claims administration costs, and expenses, all of the net settlement funds will be paid to eligible dealerships that file 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 these settlements provide significant value to Auto Dealers in their prosecution of the claims against non-settling Defendants.

With this second group of settlements, nearly $184 million has been recovered for the benefit of 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 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*, 218 F.R.D. at 534 (internal quotation marks omitted); see *Ramey,* 508 F.2d at 1196; *Delphi*, 248 F.R.D. at 504; see also Declaration of Arthur J. Miller, 2:12-md-02311-MOB-MKM,

Doc. # 1398-1; Declaration of Frank J. Kelley, 2:12-md-02311-MOB-MKM, Doc. # 1398-2. 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 Department of Justice did not seek restitution from the settling Defendants. Any recovery for Auto Dealers needed to come through the work of lawyers working on a contingent basis. The significant expenses, combined with the high degree of uncertainty of ultimate success, make contingent fees a virtual necessity for cases like these. Compensation in an amount appropriate to encourage skilled attorneys to assume the risks of this litigation is in the public interest. The substantial recoveries counsel for the Auto Dealers have achieved have helped 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 therein supports a reasonable fee award from a common fund. *See In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *19 (risk of non-payment a factor supporting the requested fee). The contingency factor "stands as a proxy for the risk that attorneys will not recover compensation for the work they put into a case." *Cardinal*, 528 F. Supp. 2d at 766. Indeed, "'some

courts consider the risk of non-recovery as the most important factor in fee determination.'" *Kritzer v. Safelite Solutions, LLC*, 2012 WL 1945144, at *9 (S.D. Ohio May 30, 2012) (quoting *Cardinal*, 528 F. Supp. 2d at 766). "[W]ithin the set of colorable legal claims, a higher risk of loss does argue for a higher fee." *In re Trans Union Corp. Privacy Litig.*, 629 F. 3d 741, 746 (7th Cir. 2011). "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 has held 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 fees requested. *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*, 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 MDL litigation magnifies that complexity. The DOJ has described the anti-competitive conduct at issue here as the largest criminal cartel it has ever prosecuted. 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.

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 Interim Co-Lead Counsel for the Auto Dealers to have the requisite skill and experience in class action and antitrust litigation to serve effectively as class counsel for the Auto Dealers. In assessing this *Ramey* factor, courts also look to the qualifications of the defense counsel opposing the class. Defense counsel here are also 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 Crosscheck Confirms that the Requested Fee Is Reasonable.

Some courts apply a lodestar "cross-check" on the reasonableness of the fee calculated as a percentage of the fund. *Cardinal*, 528 F. Supp. 2d at 764; *In re Packaged Ice Antitrust Litig.*, 2011 WL 6209188, at *18. A lodestar cross-check is optional, however, and the Court is not required to engage in a detailed scrutiny of time records. *Cardinal*, 528 F. Supp. 2d at 767. The 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., Air Cargo*, 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. There has been an enormous amount of work done. Discovery has been extensive and Defendants have been 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 these cases to trial.

Counsel for the Auto Dealers have vigorously prosecuted these case but have done so while being efficient and avoiding duplication. As shown in the declarations submitted with this motion, counsel representing the Auto Dealers and their professional staff have worked more than 89,000 hours in the cases involved in these settlements (up to September 15, 2016). (*See* Raiter Decl.;

Declarations of Don Barrett, Jon Cuneo, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore).[6]

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. The following table provides an aggregated summary of that lodestar:

Lodestar Using Customary Auto Dealer Rates		
Category of Timekeeper	**Number of Hours**	**Lodestar**
Partner	31,685.44	$23,830,159.58
Associate	43,272.75	$21,315,006.67
Paralegal	11,604.70	$1,956,883.50
Of Counsel	2,668.85	$1,304,892.50
Total	**89,231.74**	**$48,406,942.25**

As an alternative way for the Court to calculate a lodestar for this optional cross-check, counsel for the Auto Dealers also provide the Court with the option to consider capped, normalized rates for the categories of time keepers performing the work. Although the Auto Dealer attorneys and their firms customarily charge higher rates, for purposes of the Court's lodestar cross-check, the Auto Dealers applied the following blended rates to each category of legal professional below:

Normalized Auto Dealer Rates			
Category of Timekeeper	**Rate**	**Number of Hours**	**Lodestar**
Partner	$675	$31,685.44	$21,387,672.00
Associate	$375	$43,272.75	$16,227,281.25
Paralegal	$200	$11,604.70	$2,320,940.00
Of Counsel	$450	$2,668.85	$1,200,982.50
	Total	**$89,231.74**	**$41,136,875.75**

[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.

Applying these normalized rates to the hours reasonably expended on the cases involved in these settlements yields a "lodestar" of approximately $41.1 million for the work done on these cases from their inception.[7]

The requested fee is $38,299,350, which represents one-third of the funds remaining after deducting the fund for future litigation expenses and the costs of notice and claims administration. (*See* Raiter Decl.) If applied to the gross amount of the settlements, the requested fee is 30.6% of the settlements currently before the Court. A chart that illustrates the pro rata reduction of those fees from the settlements at issue is provided with this brief as Appendix C.[8]

The Court previously awarded counsel for the Auto Dealers attorneys' fees of $18,500,168 for the initial group of Auto Dealer settlements. Adding that award to the fees sought here results in a total award of $56,799,518. Using that fee award total, and comparing it to the total normalized lodestar for the work done on the cases in which Auto Dealer settlements have been approved or for which final approval is currently being sought, results in a lodestar multiplier of time spent to-date on these cases of 1.38. Using the same fee award total, and comparing it to the total lodestar using counsel's customary rates for the work done on the cases in which Auto Dealer settlements have been approved or for which final approval is currently being sought, results in a lodestar multiplier of time spent to-date on these cases of 1.17.

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 modest "multiplier" of either 1.17 or 1.38 of the lodestar. This multiplier is reasonable and much lower than

[7] 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).

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[8] The terms of the settlement with DENSO require, as a condition of finality, that the parallel End Payor settlement be approved by the Court. The Auto Dealers will, therefore, only disburse the attorneys' fees, expenses, and future litigation set asides on a pro rata basis from the other settlements until the End Payor settlement with DENSO receives an order of final approval.

the positive multipliers approved in other cases. *See*, *e.g.*, *Cardinal*, 528 F. Supp. 2d at 767-68 (approving multiplier of 6, and observing that "[m]ost courts agree that the typical lodestar multiplier" on a large class action "ranges from 1.3 to 4.5"); *Prandin*, 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, 2:12-cv-00601-MOB-MKM, Doc. No. 128 (awarding direct purchaser fees of 2.09 times the lodestar).

The lodestar here is conservative because it does not include the time spent prosecuting these cases since September 1, 2016 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 able counsel who have asserted vigorous defenses. Defendants' efforts have required the Auto Dealers to expend considerable effort and skill in prosecuting these cases.

Given the excellent results achieved, the complexity of the claims and defenses, the real risk of non-recovery, the formidable defense teams, the delay in receipt of payment, and the substantial experience and skill of counsel, the requested multiplier on the lodestar and the resulting fee is reasonable compensation for the work done by counsel for the Auto Dealers. 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 any positive multiplier on the current lodestar will be eroded.

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: October 14, 2016

By: /s/ Gerard V. Mantese

Gerard V. Mantese (P34424)
Alexander. E. Blum (P74040)
MANTESE HONIGMAN, P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203 Facsimile: (248) 457-9201
gmantese@manteselaw.com
ablum@manteselaw.com

Interim Liaison Counsel for the Automobile Dealer Plaintiffs

Jonathan W. Cuneo
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave, NW, Suite 200
Washington, DC 20016
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
jonc@cuneolaw.com

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

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

Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs

CERTIFICATE OF SERVICE

I, Gerard V. Mantese, hereby certify that I caused a true and correct copy of **AUTO DEALERS' MEMORANDUM IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES AND SET ASIDE FOR FUTURE LITIGATION EXPENSES** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on October 14, 2016

/s/ Gerard V. Mantese
Gerard V. Mantese

Automobile Dealership Plaintiffs Settlement Funds (Second Group)		
Settling Defendant	**Automotive Parts Case**	**Settlement Fund**
DENSO	Air Conditioning Systems	$6,895,621.02
	Alternators	$15,931,345.61
	Automatic Transmission Fluid Warmers and Oil Coolers	$525,139.87
	Automotive Wire Harness Systems	$4,588,989.78
	Ceramic Substrates	$483,517.41
	Fan Motors	$44,880.00
	Fuel Injection Systems (includes Air Flow Meters and Electronic Throttle Bodies)	$6,123,994.82
	Fuel Senders	$59,312.42
	Heater Control Panels	$4,634,740.67
	HID Ballasts	$449,937.81
	Ignition Coils	$5,288,470.65
	Instrument Panel Clusters	$2,376,556.40
	Inverters	$44,880.00
	Motor Generators	$44,880.00
	Power Window Motors	$44,880.00
	Radiators	$4,977,154.44
	Spark Plugs, Oxygen Sensors or Air Fuel Ratio Sensors	$3,082,220.81
	Starters	$3,066,072.02
	Valve Timing Control Devices	$1,377,485.94
	Windshield Washer Systems	$114,624.79
	Windshield Wiper Systems	$1,045,295.54
Furukawa	Automotive Wire Harness Systems	$13,440,000.00
LEONI	Automotive Wire Harness Systems	$468,000.00
MELCO	Alternators	$5,409,456.63
	Automotive Wire Harness Systems	$1,014,146.35
	Electronic Powered Steering Assemblies	$1,014,146.35
	Fuel Injection Systems	$1,014,146.35
	HID Ballasts	$1,014,146.35
	Ignition Coils	$4,600,167.84
	Starters	$5,202,570.78
	Valve Timing Control Devices	$1,014,146.35
NSK	Bearings	$7,080,000.00
	Electronic Powered Steering Assemblies	$1,200,000.00
Omron	Power Window Switches	$960,000.00
Schaeffler	Bearings	$2,400,000.00
Sumitomo	Automotive Wire Harness Systems	$11,310,700.00
	Heater Control Panels	$689,300.00

Sumitomo Riko	Anti-Vibration Rubber Parts	$3,247,560.00
	Automotive Hoses	$352,440.00
Valeo	Air Conditioning Systems	$2,100,000.00
	TOTAL	**$124,730,927.00**

Automobile Dealership Plaintiffs' Proposed Future Litigation Fund				
Settling Defendant	**Automotive Parts Case**	**Settlement Fund**	**Percent of Total Settlements**	**Future Litigation Fund Contribution**
DENSO	Air Conditioning Systems	$6,895,621.02	5.53%	$551,809.62
	Alternators	$15,931,345.61	12.77%	$1,274,251.15
	Automatic Transmission Fluid Warmers and Oil Coolers	$525,139.87	0.42%	$41,909.59
	Automotive Wire Harness Systems	$4,588,989.78	3.68%	$367,207.85
	Ceramic Substrates	$483,517.41	0.39%	$38,916.05
	Fan Motors	$44,880.00	0.04%	$3,991.39
	Fuel Injection Systems (includes Air Flow Meters and Electronic Throttle Bodies)	$6,123,994.82	4.91%	$489,943.08
	Fuel Senders	$59,312.42	0.05%	$4,989.24
	Heater Control Panels	$4,634,740.67	3.72%	$371,199.24
	HID Ballasts	$449,937.81	0.36%	$35,922.51
	Ignition Coils	$5,288,470.65	4.24%	$423,087.30
	Instrument Panel Clusters	$2,376,556.40	1.91%	$190,588.86
	Inverters	$44,880.00	0.04%	$3,991.39
	Motor Generators	$44,880.00	0.04%	$3,991.39
	Power Window Motors	$44,880.00	0.04%	$3,991.39
	Radiators	$4,977,154.44	4.00%	$399,138.97
	Spark Plugs, Oxygen Sensors or Air Fuel Ratio Sensors	$3,082,220.81	2.47%	$246,468.31
	Starters	$3,066,072.02	2.46%	$245,470.46
	Valve Timing Control Devices	$1,377,485.94	1.10%	$109,763.22
	Windshield Washer Systems	$114,624.79	0.09%	$8,980.63
	Windshield Wiper Systems	$1,045,295.54	0.84%	$83,819.18
Furukawa	Automotive Wire Harness Systems	$13,440,000.00	10.78%	$1,075,679.51
LEONI	Automotive Wire Harness Systems	$468,000.00	0.38%	$37,918.20
MELCO	Alternators	$5,409,456.63	4.34%	$433,065.78
	Automotive Wire Harness Systems	$1,014,146.35	0.81%	$80,825.64
	Electronic Powered Steering Assemblies	$1,014,146.35	0.81%	$80,825.64
	Fuel Injection Systems	$1,014,146.35	0.81%	$80,825.64
	HID Ballasts	$1,014,146.35	0.81%	$80,825.64
	Ignition Coils	$4,600,167.84	3.69%	$368,205.70
	Starters	$5,202,570.78	4.17%	$416,102.37
	Valve Timing Control Devices	$1,014,146.35	0.81%	$80,825.64

NSK	Bearings	$7,080,000.00	5.68%	$566,777.33
	Electronic Powered Steering Assemblies	$1,200,000.00	0.96%	$95,793.35
Omron	Power Window Switches	$960,000.00	0.77%	$76,834.25
Schaeffler	Bearings	$2,400,000.00	1.92%	$191,586.70
Sumitomo	Automotive Wire Harness Systems	$11,310,700.00	9.07%	$905,047.61
	Heater Control Panels	$689,300.00	0.55%	$54,881.61
Sumitomo Riko	Anti-Vibration Rubber Parts	$3,247,560.00	2.60%	$259,440.33
	Automotive Hoses	$352,440.00	0.28%	$27,939.73
Valeo	Air Conditioning Systems	$2,100,000.00	1.66%	$165,642.67
	TOTAL	**$124,730,927.00**	**100.00%**	**$9,978,474.16**

Automobile Dealership Plaintiffs Proposed Attorneys' Fees					
Settling Defendant	**Automotive Parts Case**	**Settlement Fund**	**Pro Rata Share of Notice and Claim Administration Costs**	**Future Litigation Fund Contribution**	**Attorneys' Fees**
DENSO	Air Conditioning Systems	$6,895,621.02	$16,590.00	$551,809.62	$2,114,603.80
	Alternators	$15,931,345.61	$38,310.00	$1,274,251.15	$4,885,698.15
	Automatic Transmission Fluid Warmers and Oil Coolers	$525,139.87	$1,260.00	$41,909.59	$161,076.76
	Automotive Wire Harness Systems	$4,588,989.78	$11,040.00	$367,207.85	$1,407,260.64
	Ceramic Substrates	$483,517.41	$1,170.00	$38,916.05	$148,200.45
	Fan Motors	$44,880.00	$120.00	$3,991.39	$13,629.54
	Fuel Injection Systems (includes Air Flow Meters and Electronic Throttle Bodies)	$6,123,994.82	$14,730.00	$489,943.08	$1,878,017.25
	Fuel Senders	$59,312.42	$150.00	$4,989.24	$18,107.73
	Heater Control Panels	$4,634,740.67	$11,160.00	$371,199.24	$1,421,180.48
	HID Ballasts	$449,937.81	$1,080.00	$35,922.51	$138,005.10
	Ignition Coils	$5,288,470.65	$12,720.00	$423,087.30	$1,621,794.45
	Instrument Panel Clusters	$2,376,556.40	$5,730.00	$190,588.86	$728,655.85
	Inverters	$44,880.00	$120.00	$3,991.39	$13,629.54
	Motor Generators	$44,880.00	$120.00	$3,991.39	$13,629.54
	Power Window Motors	$44,880.00	$120.00	$3,991.39	$13,629.54
	Radiators	$4,977,154.44	$12,000.00	$399,138.97	$1,526,005.16
	Spark Plugs, Oxygen Sensors or Air Fuel Ratio Sensors	$3,082,220.81	$7,410.00	$246,468.31	$945,250.83
	Starters	$3,066,072.02	$7,380.00	$245,470.46	$940,200.52
	Valve Timing Control Devices	$1,377,485.94	$3,300.00	$109,763.22	$422,574.24

	Windshield Washer Systems	$114,624.79	$270.00	$8,980.63	$35,214.72
	Windshield Wiper Systems	$1,045,295.54	$2,520.00	$83,819.18	$320,492.12
Furukawa	Automotive Wire Harness Systems	$13,440,000.00	$32,340.00	$1,075,679.51	$4,121,440.16
LEONI	Automotive Wire Harness Systems	$468,000.00	$1,140.00	$37,918.20	$143,360.60
MELCO	Alternators	$5,409,456.63	$13,020.00	$433,065.78	$1,658,796.95
	Automotive Wire Harness Systems	$1,014,146.35	$2,430.00	$80,825.64	$311,106.90
	Electronic Powered Steering Assemblies	$1,014,146.35	$2,430.00	$80,825.64	$311,106.90
	Fuel Injection Systems	$1,014,146.35	$2,430.00	$80,825.64	$335,373.57
	HID Ballasts	$1,014,146.35	$2,430.00	$80,825.64	$335,373.57
	Ignition Coils	$4,600,167.84	$11,070.00	$368,205.70	$1,410,654.05
	Starters	$5,202,570.78	$12,510.00	$416,102.37	$1,595,489.47
	Valve Timing Control Devices	$1,014,146.35	$2,430.00	$80,825.64	$311,106.90
NSK	Bearings	$7,080,000.00	$17,040.00	$566,777.33	$2,171,074.22
	Electronic Powered Steering Assemblies	$1,200,000.00	$2,880.00	$95,793.35	$368,068.88
Omron	Power Window Switches	$960,000.00	$2,310.00	$76,834.25	$294,388.58
Schaeffler	Bearings	$2,400,000.00	$5,760.00	$191,586.70	$736,137.77
Sumitomo	Automotive Wire Harness Systems	$11,310,700.00	$27,210.00	$905,047.61	$3,468,550.80
	Heater Control Panels	$689,300.00	$1,650.00	$54,881.61	$211,472.80
Sumitomo Riko	Anti-Vibration Rubber Parts	$3,247,560.00	$7,800.00	$259,440.33	$996,039.89
	Automotive Hoses	$352,440.00	$840.00	$27,939.73	$108,166.76
Valeo	Air Conditioning Systems	$2,100,000.00	$4,980.00	$165,642.67	$644,785.78
	TOTAL	**$124,730,927.00**	**$300,000.00**	**$9,978,474.16**	**$38,299,350.96**

Index of Exhibits

Ex. 1 – Declaration of Shawn M. Raiter in Support of Auto Dealers' Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses

Ex. 2 – Affidavits in Support of Motion

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

IN RE AUTOMOTIVE PARTS ANTITTRUST LITIGATION	:	Master File No. 12-md-02311
	:	Honorable Marianne O. Battani
	:	
In Re: Wire Harness	:	Case No. 2:12-cv-00102
In Re: Instrument Panel Clusters	:	Case No. 2:12-cv-00202
In Re: Fuel Senders	:	Case No. 2:12-cv-00302
In Re: Heater Control Panels	:	Case No. 2:12-cv-00402
In Re: Bearings	:	Case No. 2:12-cv-00502
In Re: Alternators	:	Case No. 2:13-cv-00702
In Re: Anti Vibrational Rubber Parts	:	Case No. 2:13-cv-00803
In Re: Windshield Wiper Systems	:	Case No. 2:13-cv-00902
In Re: Radiators	:	Case No. 2:13-cv-01002
In Re: Starters	:	Case No. 2:13-cv-01102
In Re: Ignition Coils	:	Case No. 2:13-cv-01402
In Re: Motor Generators	:	Case No. 2:13-cv-01502
In Re: HID Ballasts	:	Case No. 2:13-cv-01702
In Re: Inverters	:	Case No. 2:13-cv-01802
In Re: Electronic Powered Steering Assemblies	:	Case No. 2:13-cv-01902
In Re: Air Flow Meters	:	Case No. 2:13-cv-02002
In Re: Fan Motors	:	Case No. 2:13-cv-02102
In Re: Fuel Injection Systems	:	Case No. 2:13-cv-02202
In Re: Power Window Motors	:	Case No. 2:13-cv-02302
In Re: Automatic Transmission Fluid Warmers	:	Case No. 2:13-cv-02402
In Re: Valve Timing Control Devices	:	Case No. 2:13-cv-02502
In Re: Electronic Throttle Bodies	:	Case No. 2:13-cv-02602
In Re: Air Conditioning Systems	:	Case No. 2:13-cv-02702
In Re: Windshield Washer Systems	:	Case No. 2:13-cv-02802
In Re: Spark Plugs	:	Case No. 2:15-cv-03002
In Re: Automotive Hoses	:	Case No. 2:15-cv-12893
In Re: Power Window Switches	:	Case No. 2:16-cv-03902
In Re: Ceramic Substrates	:	Case No. 2:16-cv-12194

THIS DOCUMENT RELATES TO
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

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. I am one of the Interim Co-Lead Class Counsel appointed by the Court to represent the putative litigation and provisionally-certified settlement classes of automobile dealerships in this multi-district litigation ("Auto Dealers").

2. The firms representing the Auto Dealers 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.

3. 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 30 different cases related to different parts (or type of part) involved in a bid-rigging and price-fixing conspiracy involving approximately 100 Defendants.

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

- 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 Department of Justice 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 100 Defendants;
- Collecting and analyzing information and discovery including voluminous discovery produced by the Defendants and third parties like the OEMs;
- Consultation with economic and other liability and damages experts;

- Drafting and negotiating key case-management documents, protocols, and stipulations;
- Review, in conjunction with the other plaintiff groups, of millions of pages of foreign-language and translated documents produced by the Defendants;
- Receipt of cooperation materials from amnesty applicants, and attending in-person proffers from amnesty applicants who disclose the details of the conspiracies;
- Drafting, preparing for, and arguing numerous oppositions to motions to dismiss;
- Drafting and opposing 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;
- Attending MDL status conferences with Judge Battani;
- Preparing for, traveling to, and attending more than 100 depositions of third-party automobile dealerships and class representative dealerships;
- Preparing for, traveling to, and attending depositions of Defendants and their representatives;
- Performing all the tasks necessary to reach these settlements, including formulating demands, negotiating, in some cases mediation, dozens of in-person meetings, exchange of drafts, preparing escrow agreements;
- Drafting settlement agreements, preliminary approval motions, and in some cases attend and argue preliminary approval motions;
- Receiving cooperation materials from settling Defendants, attend in-person proffers from settling Defendants who disclose the details of the conspiracies, and review and analyze cooperation materials from settling Defendants and 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

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

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

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

8. The discovery in these cases continues and the non-settling Defendants continue to pursue discovery. More than 100 depositions of non-party Auto Dealers and of the class representatives have been conducted. The depositions of the Defendants are also underway and will continue for months.

9. The Court has before it settlements totaling nearly $125 million for the benefit of eligible Auto Dealers. The settlements were reached after litigation was well underway and were negotiated by experienced counsel on both sides. The settlements were reached through lengthy negotiations of the parties, some of which took many months and involved many communications and numerous rounds of negotiation. When necessary, the parties engaged a mediator. In each case before the Court, counsel on both sides was armed with transactional data, documents produced in discovery, and a strong understanding of the claims and defenses.

10. The Court is well-versed with the complexity of this litigation. For only the cases at issue in these settlements, counsel for the Auto Dealers have dedicated thousands of attorney hours and hours for paralegals and law clerks. Interim Co–Lead Counsel for the Auto Dealers coordinated the efforts of counsel representing the Auto Dealers to maximize efficiency, minimize duplication of effort, and minimize unnecessary or duplicative billing. Interim Co-Lead Counsel for the Auto Dealers also monitored the work to avoid unauthorized or unnecessary work.

11. 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.

12. 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 provides a substantial benefit to the dealership class members in other cases.

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

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

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

16. Counsel for the Auto Dealers have also invested approximately **$450,046.88** 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.

17. Interim Co-Lead Counsel for the Auto Dealers also issued assessments to the firms working working for the Auto Dealers to be used to pay certain large expenses. The Barrett Law Group has maintained that fund and 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 Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore.

18. 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 these 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 costs of the work by their experts will be in the 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.

19. Interim Co-Lead Counsel for the Auto Dealers also request that the Court authorize them to set aside eight percent of the current settlement proceeds (**$9,978,474.16**) 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.

20. 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 service awards that the class representative dealerships may request in the future from these settlements. When such requests are made, motions and supporting information will be provided to the Court. If sin the operative complaints in the cases with settlements currently before the Court.

21. As set forth in the declarations of Jon Cuneo, Don Barrett, Shawn Raiter, Gerard Mantese, Dewitt Lovelace, Tom Thrash, John Kakinuki, Charles Barrett, Brian Herrington, and Pierce Gore, counsel for the Auto Dealers have advanced **$450,046.88** in unreimbursed litigation costs in the cases with settlements currently before the Court. 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.

22. As set forth in the declarations of Jon 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 four years and have worked more than 77,000 attorney hours and more than 11,000 hours for paralegals and law clerks 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 approximately $48.4 million through September 15, 2016. If the Court chooses to apply the normalized and blended rates set forth in the brief supporting this motion, the lodestar totals $41.1 million.

23. The development, implementation, and delivery of the notice plan for the settlements before the Court and the administration of claims (if the the settlements are granted final approval) are expected to cost approximately $300,000.00.

24. Interim Co-Lead Counsel for the Auto Dealers respectfully request a fee award equal to one-third of the settlements, after the deduction of the fund for future litigation expense and the cost of class notice and claims administration. That calculation is: ($124,730,980 – $9,978,474.16 – $300,000) / 3 = **$38,299,350**.

25. The Court previously awarded $18,500,168 in fees to counsel for the Auto Dealers for settlements reached in nearly all of the cases in which there are settlements currently before the Court. When added together, the fees awarded to counsel for the Auto Dealers in the first group of settlements and those sought in this motion total $56,799,518.

26. The $38,299,350 fee award Interim Co-Lead Counsel for the Auto Dealers respectfully requests, when coupled with the Court's prior fee award, represents approximately 1.17 of the the current lodestar, using counsel's 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.

27. The $38,299,350 fee award Interim Co-Lead Counsel for the Auto Dealers respectfully requests, when coupled with the Court's prior fee award, represents approximately 1.38 of the the current lodestar, using the exemplar normalized and blended 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 pentalty of perjury that the foregoing is true and correct.

Executed this the 14th day of October, 2016 St. Paul, Minnesota.

/s/ Shawn M. Raiter
Shawn M. Raiter

Exhibit 2
Affidavits in Support of Motion

Brian Herrington

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

DECLARATION OF BRIAN HERRINGTON CONCERNING TIME AND EXPENSES INCURRED BY HERRINGTON LAW, PA

I, Brian Herrington, declare as follows:

1. I am a partner at the law firm of Herrington Law, PA. I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Herrington Law, PA in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of $24,250.29 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actionsand have not been reimbursed.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 1,042.80 hours. The total lodestar for my firm for this period using current hourly billing rates is $599,610.

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

Executed this the 12th day of October, 2016 in Jackson, Mississippi.

/s/ Brian Herrington
BRIAN HERRINGTON

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: HERRINGTON LAW, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Brian Herrington	Owner/ Partner	1,042.80	$575.00	$599,610
TOTALS		1,042.80		$599,610

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

FIRM NAME: HERRINGTON LAW, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transporation, lodging, meals, etc.)	$24,250.29
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	$24,250.29

In Re: Auto Patts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Herrington Law, PA**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Brian Herrington	P	$575.00	1,042.80	$599,610
		$		$
		$		$
		$		$
		$		$
		$		$
TOTALS			**1,042.80**	**$599,610**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Herrington Law, PA**
Case: Wire Harness
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	$24,250.29
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	$24,250.29

Charles Barrett

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

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

I, Charles Barrett, declare as follows:

1. I am of counsel at the law firm of Neal & Harwell, PLC. I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Neal & Harwell, PLC in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of $28,054.93 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actionsand have not been reimbursed.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 1078.20 hours. The total lodestar for my firm for this period using current hourly billing rates is $339,737.50.

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

Executed this the 11th day of October, 2016 in Nashville, Tennessee.

/s/ Charles Barrett
CHARLES BARRETT

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: NEAL & HARWELL, PLC
Reporting Period: Inception – August 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Charles Barrett	OC	484.70	See Exhibit 1 for current and historic rates	$195,732.50
Dawn Garrison	PL	103.50	$100.00	$10,350.00
Elizabeth Tipping	P	73.95	$375.00	$27,731.25
Blind Akrawi	A	94.50	$300.00	$28,350.00
Megan Deardorff	A	67.00	$300.00	$20,100.00
William J. Harbison II	A	169.80	$225.00	$38,205.00
Jeffrey Zager	A	67.00	$225.00	$15,075.00
Marie Scott	A	9.50	$225.00	$2,137.50
Mariam Stockton	A	6.25	$225.00	$1,406.25
Jeff Gibson	A	2.00	$325.00	$650.00
TOTALS		**1078.20**		**$339,737.50**

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION
FIRM NAME: NEAL & HARWELL, PLC
REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$2,034.39
Postage Charges	$64.26
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	$222.76
Travel (Transporation, lodging, meals, etc.)	$21,139.92
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	$4,593.60
TOTAL	$28,054.93

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	OC	$425.00	56.90	$24,182.50
Charles F. Barrett	OC	$400.00	53.90	$21,560.00
Elizabeth Tipping	P	$375.00	10.75	$4,031.25
Blind Akrawi	A	$300.00	93.00	$27,900.00
Megan N. Deardorff	A	$300.00	45.25	$13,575.00
William J. Harbison II	A	$225.00	156.70	$35,257.50
Jeffrey Zager	A	$225.00	67.00	$15,075.00
Marie Scott	A	$225.00	9.50	$2,137.50
Mariam Stockton	A	$225.00	6.25	$1,406.25
Dawn Garrison	PL	$100	2.60	$260.00
TOTALS			**501.85**	**$145,385.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: General
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	11,707.73
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	11,707.73

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F Barrett	OC	$425.00	21.60	$9,180.00
Charles F Barrett	OC	$400.00	239.90	$95,960.00
Elizabeth Tipping	P	$375.00	63.20	$23,700.00
Blind Akrawi	A	$300.00	1.50	$450.00
Megan N. Deardorff	A	$300.00	21.75	$6,525.00
William J. Harbison II	A	$225.00	13.10	$2,947.50
Jeffrey Gibson	A	$325.00	2.00	$650.00
Dawn Garrison	PL	$100.00	98.10	$9,810.00
TOTALS			**461.15**	**$149,222.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Wire Harness
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$2,034.39
Postage Charges	$64.26
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	222.76
Travel (Transportation, lodging, meals, etc.)	$9,432.19
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Other-document review	$4,118.60
Computer Research	
Miscellaneous (Describe) Mobile Screen Works, Box Relocation, Professional Services	475.00
TOTAL	$16,347.20

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Spark Plugs
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Spark Plugs
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Windshield Wiper Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Windshield Wiper Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Windshield Washer Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Windshield Washer Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Radiators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Radiators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Power Window Switches
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Power Window Switches
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Power Window Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Power Window Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Ignition Coils
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Ignition Coils
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Heater Control Panels
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Fuel Injection Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Fuel Injection Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Fan Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Fan Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Electronic Throttle Bodies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Electronic Throttle Bodies
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Ceramic Substrates
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Ceramic Substrates
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Bearings
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Automotive Hoses
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Alternators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Alternators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Air Conditioning Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**N/A**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Neal & Harwell, PLC**
Case: Air Conditioning Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Air Flow**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425		
Charles F. Barrett	P	$400	4.8	$1,920.00
Dawn Garrison	PL	$100		
TOTALS			4.8	**$1,920.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: **Air Flow**
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **ATF**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425		
Charles F. Barrett	P	$400	5.6	$2,240.00
Dawn Garrison	PL	$100		
TOTALS			**5.6**	**$2,240.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: **ATF**
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: Charles Barrett
Case: Fuel Senders
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425	0.00	$
Charles F. Barrett	P	$400	19.7	$7,880.00
Dawn Garrison	PL	$100	.5	$50.00
TOTALS			20.2	$7,930.00

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: Fuel Senders
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Generators**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425		
Charles F. Barrett	P	$400	1.5	$600.00
Dawn Garrison	PL	$100		
TOTALS			**1.50**	**$600.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: **Generators**
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: HID Ballasts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425	0.00	$
Charles F. Barrett	P	$400	4.2	$1,680.00
Dawn Garrison	PL	$100	0.00	$
TOTALS			4.2	**$1,680.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: HID Ballasts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: Inverters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425	0.00	$
Charles F. Barrett	P	$400	4.7	$1,880.00
Dawn Garrison	PL	$100	0.00	$
		$		$
		$		$
		$		$
TOTALS			**4.7**	**$1,880.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: Inverters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: Starters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425	0.00	$
Charles F. Barrett	P	$400	.5	$80.00
Dawn Garrison	PL	$100	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.50**	**$80.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: Starters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: IPC
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425	.4	$170.00
Charles F. Barrett	P	$400	69	$27,600.00
Dawn Garrison	PL	$100	2.3	$230.00
TOTALS			**71.70**	**$28,000.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: IPC
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Charles Barrett**
Case: **Valve Timing Control Devices**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles F. Barrett	P	$425	0.00	$
Charles F. Barrett	P	$400	2	$800.00
Dawn Garrison	PL	$100	0.00	$
TOTALS			**2.00**	**$800.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Charles Barrett**
Case: **Valve Timing Control Devices**
Reporting Period: **Inception to August 31, 2016**

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

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

Dewitt Lovelace

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

I, Dewitt M. Lovelace, declare as follows:

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

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Lovelace and Associates, PA in similar complex class action matters and are similar to rates approved for our work by other courts.

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

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 5,363.1 hours. The total lodestar for my firm for this period using current hourly billing rates is $2,316,090.00.

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

Executed this the 10th day of October, 2016 in Miramar Beach, Florida.

/s/
DEWITT M. LOVELACE

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: LOVELACE AND ASSOCIATES, P.A.

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Dewitt M. Lovelace	Owner/ Partner	1,353.8	$800.00	$1,083,040.00
Valerie Lauro	Associate	1,207.2	$400.00	$482,880.00
Marshall Smith	Associate	97.9	$575.00	$56,292.50
Gary Yarborough	Associate	408.1	$575.00	$234,657.50
Sandy Rosenthal	Paralegal	2,296.1	$200.00	$459,220.00
TOTALS		5,363.1		**$2,316,090.00**

P = Partner
C = Counsel
A = Associate
PL = Paralegal
LA = Legal Assistant

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

FIRM NAME: LOVELACE AND ASSOCIATES, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Air Conditioning Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.50	$400.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	20.00	$4,000.00
TOTALS			**20.50**	**$4,400.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Air Conditioning Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Air Flow Meters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	1.90	$1,520.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	13.00	$2600.00
TOTALS			**14.90**	**$4,120.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Air Flow Meters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Alternators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	1.80	$1,440.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	25.20	$5,040.00
TOTALS			**27.00**	**$6,480.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Alternators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	4.90	$3,920.00
Valerie Lauro	A	$400.00	7.40	$2,960.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.60	$345.00
Sandy Rosenthal	PL	$200.00	42.10	$8,420.00
TOTALS			**55.00**	**$15,645.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Automotive Hoses
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Automatic Transmission Fluid Warmers
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	8.30	$1,660.00
TOTALS			**8.30**	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Automatic Transmission Fluid Warmers
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Bearings
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	29.40	$23,520.00
Valerie Lauro	A	$400.00	104.30	$41,720.00
Marshall Smith	A	$575.00	97.90	$56,292.50
Gary Yarborough	A	$575.00	215.10	$123,682.50
Sandy Rosenthal	PL	$200.00	64.10	$12,820.00
TOTALS			**510.80**	**$258,035.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Ceramic Substrates
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Ceramic Substrates
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	31.00	$6,200.00
TOTALS			**31.00**	**$6,200.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Electronic Throttle Bodies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	1.90	$1,520.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	12.90	$2,580.00
TOTALS			**14.80**	**$4,100.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Electronic Throttle Bodies
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Fan Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	2.20	$1,760.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.20	$115.00
Sandy Rosenthal	PL	$200.00	17.00	$3,400.00
TOTALS			**19.40**	**$5,275.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Fan Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Fuel Injection Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	2.40	$1,920.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	43.00	$8,600.00
TOTALS			**45.40**	**$10,520.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Fuel Injection Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Fuel Senders
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	4.00	$3,200.00
Valerie Lauro	A	$400.00	1.40	$560.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	21.90	$4,380.00
TOTALS			**27.30**	**$8,140.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Fuel Senders
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	141.90	$113,520.00
Valerie Lauro	A	$400.00	123.90	$49,560.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	228.30	$45,660.00
TOTALS			**494.10**	**$208,740.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Auto Parts General
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Heater Control Panels
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	9.70	$7,760.00
Valerie Lauro	A	$400.00	12.20	$4,880.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	53.50	$30,762.50
Sandy Rosenthal	PL	$200.00	44.90	$8,980.00
TOTALS			**120.30**	**$52,382.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: HID Ballasts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.50	$400.00
Valerie Lauto	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	32.80	$6,560.00
TOTALS			**33.30**	**$6,960.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: HID Ballasts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Ignition Coils
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	2.50	$2,000.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	26.40	$5,280.00
TOTALS			**28.90**	**$7,280.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Ignition Coils
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Instrument Panel Clusters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	26.80	$21,440.00
Valerie Lauro	A	$400.00	78.10	$31,240.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	70.40	$14,080.00
TOTALS			**175.30**	**$66,760.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Instrument Panel Clusters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Inverters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	1.60	$1,280.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	21.70	$4,340.00
TOTALS			**23.30**	**$5,620.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Inverters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Motor Generators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	2.30	$1,840.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	20.30	$4,060.00
TOTALS			**22.60**	**$5,900.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Motor Generators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Power Window Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	1.40	$1,120.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	21.40	$4,280.00
TOTALS			**22.80**	**$5,400.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Power Window Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Power Window Switches
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gaty Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Power Window Switches
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Radiators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauto	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	25.60	$5,120.00
TOTALS			**25.60**	**$5,120.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Radiators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Spark Plugs
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.00	$0.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	6.80	$1,360.00
TOTALS			**6.80**	**$1,360.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Spark Plugs
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Starters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	6.20	$4,960.00
Valerie Lauto	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	32.50	$6,500.00
TOTALS			**38.70**	**$11,460.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Starters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Valve Timing Control Devices
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	2.60	$2,080.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	32.10	$6,420.00
TOTALS			**34.70**	**$8,500.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Valve Timing Control Devices
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Windshield Washer Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.80	$640.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	20.10	$4,020.00
TOTALS			**20.90**	**$4,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Windshield Washer Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Windshield Wiper Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	0.50	$400.00
Valerie Lauro	A	$400.00	0.00	$0.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	0.00	$0.00
Sandy Rosenthal	PL	$200.00	24.70	$4,940.00
TOTALS			**25.20**	**$5,340.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Windshield Wiper Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Dewitt M. Lovelace	P	$800.00	1,108.00	$886,400.00
Valerie Lauro	A	$400.00	879.90	$351,960.00
Marshall Smith	A	$575.00	0.00	$0.00
Gary Yarborough	A	$575.00	138.70	$79,752.50
Sandy Rosenthal	PL	$200.00	1,389.60	$277,920.00
TOTALS			**3,516.20**	**$1,596,032.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **LOVELACE AND ASSOCIATES, P.A.**
Case: Wire Harness
Reporting Period: **Inception to August 31, 2016**

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

Don Barrett

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

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

I, Don Barrett, declare as follows:

1. I am a Partner at the law firm of Barrett Law Group, PA and am currently Interim Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plantiffs ("Dealership Plaintiffs"). I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, I have served as one of three Interm Co-Lead Class Counsel for the Auto Dealer Classes, and my firm has been involved in various aspects of the following activities and anticipates being involved in future activities:

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

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

August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents time spent for work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Barrett Law Group, PA in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of $8,496.14 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions and have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 12,084.87 hours. The total lodestar for my firm for this period using current hourly billing rates is $6,162,099.75.

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

Executed this the 12th day of October, 2016 in Lexington, Mississippi.

Don Barrett

DON BARRETT

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: BARRETT LAW GROUP, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Don Barrett	Owner/ Partner	1,249.70 3,320.30	800 825	999,760.00 2,739,247.50
David McMullan	P	25 91.3 83.9	400 425 475	10,000.00 38,802.50 39,852.50
Brian Herrington	P	165.50 121.9 977.3	400 425 475	66,200.00 51,807.50 464,217.50
Richard Barrett	P	33.9 93 50.1	400 425 475	13,560.00 39,525.00 23,797.50
Katherine Riley	P	144.87 111.20	425 475	61,569.75 52,820.00
Sterling Starns	P	115.3 140.5 375.6	250 300 350	28,825.00 42,150.00 131,460.00
Charles Barrett	P	3	425	1,275.00
Cary Littlejohn	JP	53.6	300	16,080.00
Ben White	OC	695.2 719.5	425 475	295,460.00 341,762.50

Don Foose	OC	422.3	475	200,592.50
Brandi Hamilton	JP	96.5 75.4 220.7	150 200 300	14,475.00 15,080.00 66,210.00
Rob McGill	OC	17	425	7,225.00
Cate Barnes	PL	142	150	21,300.00
Nanci Maddux	PL	1,981.1	150	297,165.00
Carolyn Mirick	PL	40 100	100 150	4,000.00 15,000.00
Melanie Davis	PL	72	150	10,800.00
Christy Maddux	PL	10.8	150	1,620.00
Zach Shutz	PL	245.4	150	36,810.00
Marie Thomas	PL	91	150	13,650.00
TOTALS		**12,084.87**		**$6,162,099.75**

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

FIRM NAME: BARRETT LAW GROUP, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	$3.45
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transporation, lodging, meals, etc.)	8,467.74
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	$24.95
Computer Research	
Miscellaneous (Describe)	
TOTAL	$8,496.14

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett Don Barrett	P	$825.00 $800.00	1,061.40 402.00	$875,655.00 $321,600.00
David McMullan David McMullan David McMullan	P	$475.00 $400.00 $425.00	61.4 15 36.3	$29,165.00 $6,000.00 $15,427.50
Brian Herrington	P	$425.00	2.3	$$977.50
Brian Herrington	P	$475.00	115.3	$54,767.50
Cary Littlejohn	JP	$300.00	17.2	$5,160.00
Richard Barrett	P	$400.00 $425.00 $475.00	11.9 27.1 30.10	$4,760.00 $11,517.50 $14,297.50
Sterling Starns	PL LC LC	$250.00 $300.00 $350.00	18.5 60.50 282.4	$4,625.00 $18,150.00 $98,840.00
Katherine Riley	P	$475.00 $425.00	10.00 18.27	$4,750.00 $7,764.75

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Ben White	A	$425.00 $475.00	594.20 719.5	$252,535.00 $341,762.50
Don Foose	A	$475.00	422.3	$200,592.50
Carolyn Mirick	PL	$100.00 $150.00	40 100	$4,000.00 $15,000.00
Cate Barnes	PL	$150.00	90.5	$13,575.00
Zach Schutz	PL	$150.00	245.4	$36,810.00
Christy Maddux	PL	$150.00	10.8	$1,620.00
Melanie Davis	PL	$150.00	72	$10,800.00
Nanci Maddux	PL	$150.00	1,829.00	$274,350.00
Brandi Hamilton Brandi Hamilton	PL LC JP	$150.00 $200.00 $300.00	96.5 67.6 220.7	$14,475.00 $13,520.00 $66,210.00
Marie Thomas	PL	$150.00	91.0	$13,650.00
TOTALS			**6,769.17**	**$2,732,357.25**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, PA**
Case: General
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, PA**
Case: **Wire Harness**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$800	691	$552,800.00
Don Barrett	P	$825	1,334.5	$1,100,962.50
David McMullan	P	$400	10	$4,000.00
David McMullan	P	$425	1.5	$637.5
David McMullan	P	$475	22.5	$10,687.50
Brian Herrington	P	$400	162.8	$65,120.00
Brian Herrington	P	$425	119.6	$50,830.00
Brian Herrington	P	$475	862	$409,450.00
Richard Barrett	P	$400	21.20	$8,480.00
Richard Barrett	P	$425	13.60	$5,780.00
Richard Barrett	P	$475	20	$9,500.00
Katherine B. Riley	P	$425	26.5	$11,262.5
Katherine B. Riley	P	$475	101.2	$48,070.00
Sterling Starns	PL	$250	42.9	$10,725.00
Sterling Starns	P	$300	53	$15,900.00
Sterling Starns	P	$350	33.20	$11,620.00
Ben White	A	$425	14	$5,950.00
Cary Littlejohn		$300	36.4	$10,920.00
Brandi Hamilton	LC	$200	7.8	$1,560.00

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Nanci Maddux	PL	$150	150.7	$22,605.00
Cate Barnes	PL	$150	26.5	$3,975.00
TOTALS			**3,750.9**	$2,360,835.00

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

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

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

Disbursement	Total Amount To Date
TOTAL	$0.00

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Instrument Panel Clusters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	800 825	23.9 27.1	$19,120.00 $22,357.50
David McMullan	P	425	34	$14,450.00
Brian Herrington	P	400	2.7	$1,080.00
Richard Barrett	P	$400 425	.7 32.2	$280.00 $13,685.00
Katherine Riley	P	$425	99.1	$42,117.50
Sterling Starns	PL P	250 300	45.5 8.5	$11,375.00 $2,550.00
Ben White	A	425	87	$36,975.00
Rob McGill	OC	425	17	$7,225.00
TOTALS			**377.7**	**$171,215.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Instrument Panel Clusters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group**
Case: Fuel Senders
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett Don Barrett	P	$825.00 $800.00	2.8 4.3	$2,310.00 $3,440.00
	A	$0.00	0.00	$
		$		$
TOTALS			**7.1**	**$5,750.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Fuel Senders
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group**
Case: Heater Control Panels
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett Don Barrett	P	$800.00 $825.00	29.6 63.1	$23,680.00 $52,057.50
Richard Barrett	P	$425.00	2.6	$1,105.00
TOTALS			**95.3**	**$76,842.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	1,330.26
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	1,330.26

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Bearings
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	270.3	$222,997.50
Don Barrett	P	$800.00	48	$38,400.00
Sterling Starns	P	$350.00	60	$21,000.00
Sterling Starns	P	$300.00	18.5	$5,550.00
Sterling Starns	P	$250.00	.40	$100.00
Nanci Maddux	PL	$150.00	.7	$105.00
Cate Barnes	PL	$150.00	25	$3,750.00
Richard Barrett	P	$425.00	14.2	$6,035.00
Richard Barrett	P	$400.00	.1	$40.00
Katherine Riley	P	$425.00	1.00	$425.00
David McMullan	P	$425.00	19.50	$8,287.50

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Charles Barrett	P	$425.00	3	$1,275.00
TOTALS			**460.7**	**$307,965.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	$3.45
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	$7,137.48
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	$24.95
Computer Research	
Miscellaneous (Describe)	
TOTAL	7,165.88

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Alternators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P			
Don Barrett		$825.00	19.4	$16,005.00
Don Barrett		$800.00	.6	$480.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
TOTALS			**20**	**$16,485.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Alternators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	4.5	$3,712.50
Don Barrett	P	800.00	2.8	$2,240.00
TOTALS			7.3	$5,952.50

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P. A.**
Case: Windshield Wiper Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$800	1	$800
Don Barrett	P	$825	2.5	$2,062.50
TOTALS			**3.5**	**$2,862.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Windshield Wiper Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: *Radiators*
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	825	12.6	$10,395.00
TOTALS			**12.6**	**$10,395.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Radiators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Starters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825	41.7	$34,402.50
		$		$
TOTALS			**41.7**	**$34,402.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Starters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Ignition Coils
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	21.0	$17,325.00
Don Barrett	P	$800.00	38.50	$30.800.00
Richard Barrett	P	$425.00	1.5	$637.50
	PL	$0.00	0.00	$
TOTALS			**61**	**$48,762.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Ignition Coils
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A**
Case: Motor Generators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	800 825	1.3 2.0	$1,040.00 $1,650.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**3.3**	**$2,690.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Motor Generators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: HID Ballasts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	2.4	$1,980.00
TOTALS			**2.4**	**$1,980.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: HID Ballasts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: *Inverters*
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	800 825	1.2 2.9	$960.00 $2,392.50
Richard Barrett	P	$425	1.2	$510.00
Sterling Starns	PL	250	2.5	$625.00
		$		$
		$		$
		$		$
TOTALS			7.8	$4,487.50

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Inverters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	91.6	$75,570.00
TOTALS			**91.6**	**$75,570.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
NO EXPENSES TOTAL	**$0.00**

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Air Flow Meters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	1.5	$1,237.50
Richard Barrett	P	$425.00	.4	$170.00
	PL	$0.00	0.00	$
		$		$
TOTALS			**1.9**	**$1,407.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Air Flow Meters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group**
Case: *Fuel Injection Systems*
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	105.7	$87,202.50
Don Barrett	P	$800.00	5.5	$4,400.00
Nanci-Taylor Maddux	PL	$150.00	.7	$105.00
TOTALS			**111.9**	**$91,707.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Fuel Injection Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: Barrett Law Group, P.A.
Case: Power Window Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825	18.3	$15,097.50
Richard Barrett	P	$425	.2	$85.00
Sterling Starns	PL	$250	5.5	$1,375.00
TOTALS			**24**	**$16,557.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Power Window Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Valve Timing Control Devices
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	825	110.8	$91,410.00
TOTALS			**110.8**	**$91,410.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Valve Timing Control Devices
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Air Conditioning Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	43.3	$35,722.50
TOTALS			**43.3**	**$35,722.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Air Conditioning Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Spark Plugs
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	825	5.3	$4,372.50
TOTALS			**5.3**	**$4,372.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Spark Plugs
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Don Barrett	P	$825.00	75.6	$62,370.00
TOTALS			**75.6**	**$62,370.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Your Firm Name Here**
Case: Automotive Hoses
Reporting Period: **Inception to August 31, 2016**

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

Gerard Mantese

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

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	Master File No. 12-md-02311
PRODUCT(S): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

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

I, Gerard Mantese, declare as follows:

1. I am a partner at the law firm of Mantese Honigman, PC and am currently Interim Liason Class Counsel for the Indirect Purchaser Automobile Dealer Plantiffs ("Dealership Plantiffs"). I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

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

August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Mantese Honigman, PC in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of $34,332.57 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actionsand have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 4,614 hours. The total lodestar for my firm for this period using current hourly billing rates is $2,047,842.25.

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

Executed this the 10th day of October, 2016 in Troy, Michigan.

/s/ Gerard Mantese
GERARD MANTESE

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: MANTESE HONIGMAN, PC
REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Gerard Mantese	Owner/ Partner	727.60	$650	$472,940.00
David Honigman	Partner	34.25	$650	$22,262.50
Doug Toering	Partner	.20	$650	$130
Theresamarie Mantese	Partner	7 511.45	$425 $650	$2975 $332,442.50
Ian Williamson	Partner	.80 .50	$425 $650	$340 $325
Alex Blum	Associate	220.30 510.05	$350 $395	$77,105.00 $201,469.75
Brendan Frey	Associate	1229.80	$350	$430,430.00
Brian Saxe	Associate	4.6	$350	$1,610
David Hansma	Associate	132.15	$350	$46,252.50
Fatima Mansour	Associate	5	$350	$1750
Jordan Segal	Associate	174.4	$395	$68,888
Josh Lushnat	Associate	205.35	$350	$71,872.50
Kate Eisenstein	Associate	131.70 182.35	$350 $395	$46,095 $72,028.25
Krista Hosmer	Associate	79.55 351.85	$350 $395	$27,842.50 $138,980.75
Mark Rossman	Associate	.7	$425	$297.50
Sara MacWilliams	Associate	.9	$395	$355.50

Tishia Browning	Associate	58	$350	$20,300
James Buster	LC	10	$250	$2500
Jonathan Ajlouny	LC	34	$250	$8500
Paralegal	PL	1.5	$100	$150
TOTALS		4614		$2,047,842.25

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION
FIRM NAME: MANTESE HONIGMAN, PC
REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$787.38
Postage Charges	$1,176
Facsimile Charges	
Long Distance	
In-House Photocopying	$7400.35
Outside Photocopying	
Travel (Transporation, lodging, meals, etc.)	$10,551.24
Court Fees (filing, etc.)	$12,186
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	178.85
Computer Research	$1,953.47
Miscellaneous (Describe)	$99.28
TOTAL	$34,332.57

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Air Conditioning Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	1	$650
Theresamarie Mantese	P	$650	.20	$130
Alex Blum	A	$350/$395	3.40	$1316
Brendan Frey	A	$350	12	$4200
Josh Lushnat	A	$350	.2	$70
		$		$
TOTALS			**16.80**	**$6,366**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Air Conditioning Systems
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	319.54
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	400
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	719.54

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Air Flow Meters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
		$		$
		$		$
		$		$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Alternators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.5	$325
Theresamarie Mantese	P	$650	.10	$65
Brendan Frey	A	$350	5.2	$1820
Alex Blum	A	$350/$395	2.3	$841
Kate Eisenstein	A	$350/$395	1	$350
		$		$
TOTALS			**9.10**	**$3401**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	1.30	$845
Brendan Frey	A	$350	15.65	$5477.50
Alex Blum	A	$350/$395	.80	$280
Josh Lushnat	A	$350	16.30	$5705
		$		$
		$		$
TOTALS			**34.05**	**$12,307.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	350
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	350

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Automatic Transmission Fluid Warmers
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Theresamarie Mantese	P	$650	.10	$65
Brendan Frey	A	$350	.30	$105
Alex Blum	A	$350/$395	1.90	$674
		$		$
		$		$
		$		$
TOTALS			**2.30**	$844

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.60	$390
Theresamarie Mantese	P	$650	.30	$195
Alex Blum	A	$350/$395	2.20	$770
Krista Hosmer	A	$350/$395	1	$395
		$		$
		$		$
TOTALS			**4.10**	**$1750**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Automotive Hoses
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	35
Postage Charges	127.23
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	800
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	.50
Miscellaneous (Describe)	
TOTAL	962.73

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Bearings
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	5.3	$3445
David Honigman	P	$650	.20	$130
Theresamarie Mantese	P	$650	2.4	$1560
Alex Blum	A	$350/$395	50.60	$18731.50
Brendan Frey	A	$350	109.60	$38360
David Hansma	A	$350	5.2	$1820
Jordan Segal	A	$395	155.05	$61244.75
Josh Lushnat	A	$350	4.20	$1470
Kate Eisenstein	A	$350/$395	72.20	$28249
Krista Hosmer	A	$350/$395	342.10	$132362
TOTALS			**746.85**	**$287,372.25**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	70
Postage Charges	.48
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	5140.95
Court Fees (filing, etc.)	400
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	178.85
Computer Research	51.96
Miscellaneous (Describe)	20.70
TOTAL	5862.94

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Ceramic Substrates
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Alex Blum	A	$395	4.70	$1856.50
TOTALS			**4.70**	**$1856.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Ceramic Substrates
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	53.25
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	400
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	1.00
Miscellaneous (Describe)	
TOTAL	454.25

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.20	$130
Brendan Frey	A	$350	1.20	$420
TOTALS			**1.4**	**$550**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Electronic Throttle Bodies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
	P	$0.00	0.00	$
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: Mantese Honigman, PC
Case: Fan Motors
Reporting Period: Inception – August 31, 2016

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.10	$65
Brendan Frey	A	$350	1.5	$525
TOTALS			1.6	$590

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Fuel Injection Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Alex Blum	A	$350/$395	.9	$355.50
Brendan Frey	A	$350	8.1	$2835
David Hansma	A	$350	1	$350
Josh Lushnat	A	$350	.4	$140
		$		$
		$		$
TOTALS			**10.4**	**$3680.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Fuel Senders
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	2.80	$1820
Theresamarie Mantese	P	$650	1	$650
Alex Blum	A	$350/$395	.20	$79
Brendan Frey	A	$350	31.50	$11,025
David Hansma	A	$350	5	$1750
Kate Eisenstein	A	$350/$395	.50	$175
TOTALS			**41**	**$15,499**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	423.90	$275,535.00
David Honigman	P	$650	34.05	$22,132.50
Doug Toering	P	$650	.20	$130
Theresamarie Mantese	P	$650	442.35	$287,527.50
Ian Williamson	P	$650/$395	1.3	$665
Alex Blum	A	$395/$350	306	$119,085.75
Brendan Frey	A	$350	414.50	$145,075.00
Brian Saxe	A	$350	1.90	$665
David Hansma	A	$350	35.10	$12,285
Fatima Mansour	A	$350	1	$350
Jordan Segal	A	$395	19.35	$7643.25
Josh Lushnat	A	$350	91.45	$32,007.50
Kate Eisenstein	A	$350/$395	138.95	$52,720.75
Krista Hosmer	A	$350/$395	60.15	$23,750.25
Mark Rossman	P	$425	.70	$297.50
Sara MacWilliams	A	$395	.9	$355.50
Tishia Browning	A	$350	7.7	$2695

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paralegal	PL	$150	1.5	$150
TOTALS			**1981**	**$983,070.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: General
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	577.38
Postage Charges	432.07
Facsimile Charges	
Long Distance	
In-House Photocopying	7,400.35
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	5,410.29
Court Fees (filing, etc.)	4,336
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	1,870.97
Miscellaneous (Describe)	68.98
TOTAL	20,096.04

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Heater Control Panels
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	9.8	$6370
Alex Blum	A	$350/$395	.2	$79
Brendan Frey	A	$350	52	$18,200
David Hansma	A	$350	6.8	$2380
Josh Lushnat	A	$350	.50	$175
Krista Hosmer	A	$350/$395	.20	$70
TOTALS			**69.50**	**$27,274.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	70
Postage Charges	16.37
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	350
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	29.04
Miscellaneous (Describe)	1.9
TOTAL	467.31

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: HID Ballasts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.30	$195
Alex Blum	A	$350/$395	.20	$79
Brendan Frey	A	$350	1.4	$490
		$		$
		$		$
		$		$
TOTALS			**1.9**	**$764**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Ignition Coils
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	1	$650
Alex Blum	A	$350/$395	.2	$79
Brendan Frey	A	$350	6.7	$2345
Brian Saxe	A	$350	1.5	$525
Kate Eisenstein	S	$350/$395	1	$350
		$		$
TOTALS			**10.40**	**$3949**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Instrument Panel Clusters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	8.20	$5330
Brendan Frey	A	$350	142.55	$49,892.50
David Hansma	A	$350	28.25	$9887.50
Josh Lushnat	A	$350	40.60	$14,210
		$		$
		$		$
TOTALS			**219.60**	**$79,320**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Inverters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Alex Blum	A	$350/$395	.2	$79
Brendan Frey	A	$350	16.80	$5880
David Hansma	A	$350	1	$350
Josh Lushnat	A	$350	.2	$70
		$		$
		$		$
TOTALS			**18.2**	**$6379**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Motor Generators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.20	$130
Alex Blum	A	$350/$395	.20	$79
Brendan Frey	A	$350	19.50	$6825
		$		$
		$		$
		$		$
TOTALS			**19.90**	**$7034**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Power Window Motors
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	16.37
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	800
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	816.37

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Power Window Switches
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.30	$195
Alex Blum	A	$395	11.30	$4463.50
TOTALS			**11.6**	**$4658.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman**
Case: Power Window Switches
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	35
Postage Charges	41.50
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	800
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	876.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Radiators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.30	$195
Alex Blum	A	$350/$395	.20	$79
Brendan Frey	A	$350	9.40	$3290
		$		$
		$		$
		$		$
TOTALS			**9.9**	**$3564**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman**
Case: Spark Plugs
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Theresamarie Mantese	P	$650	.10	$65
Alex Blum	A	$395	2.1	$829.50
TOTALS			**2.2**	**$894.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman**
Case: Spark Plugs
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	54.60
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	400
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	454.60

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Starters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.3	$195
Alex Blum	A	$395/$350	.2	$79
Brendan Frey	A	$350	2.8	$980
Kate Eisenstein	A	$395	1	$350
		$		$
		$		$
TOTALS			**4.30**	**$1604**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Valve Timing Control Devices
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	.10	$65
Alex Blum	A	$350/$395	.20	$79
Brendan Frey	A	$350	4.8	$1680
David Hansma	A	$350	1	$350
Josh Lushnat	A	$350	.30	$105
		$		$
TOTALS			6.40	$2279

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman**
Case: Windshield Washer Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Brendan Frey	A	$350	1.5	$525
TOTALS			**1.5**	**$525**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Windshield Washer Systems
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	400
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	3.90
TOTAL	403.90

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Windshield Wiper Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	1.0	$650
Alex Blum	A	$395	.2	$79
Brendan Frey	A	$350	4.3	$1505
David Hansma	A	$350	1	$350
Josh Lushnat	A	$350	.3	$105
Kate Eisenstein	A	$350	.5	$175
TOTALS			**7.30**	**$2864**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Mantese Honigman, PC**
Case: Windshield Wiper Systems
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	65.48
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	1150
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	3.60
TOTAL	1219.08

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Mantese Honigman, PC**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Gerard Mantese	P	$650	270.10	$175,565
Theresamarie Mantese	A	$425/$650	71.90	$45,160
Alex Blum	A	$350/$395	339.85	$127,673
Brendan Frey	A	$350	354.50	$124,075
Brian Saxe	A	$350	1.20	$420
David Hansma	A	$350	47.80	$16,730
Josh Lushnat	A	$350	50.90	$17,815
Kate Eisenstein	A	$350/$395	98.90	$35,753.50
Krista Hosmer	A	$350/$395	27.95	$10,246
Tishia Browning	A	$350	50.30	$17,605
Fatima Mansour	A	$350	4	$1,400
James Buster	LC	$250	10	$2,500
Jonathan Ajlouny	LC	$250	34	$8,500
TOTALS	**0.00**	**$0.00**	1361.40	$583,442.50

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

John Kakinuki

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

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

I, John C. Kakinuki, declare as follows:

1. I am the shareholder, CEO and an attorney at law at the law firm of Kakinuki Law Office, PC. I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

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

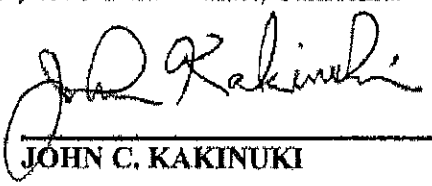
August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Kakinuki Law Office, PC in similar complex class action matters and are similar to rates approved for our work by other courts.

5. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 3,258.50 hours. The total lodestar for my firm for this period using current hourly billing rates is $2,590,507.50.

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

Executed this the 10th day of October, 2016 in San Rafael, California.



JOHN C. KAKINUKI

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: KAKINUKI LAW OFFICE, PC

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
John Kakinuki	Owner/ Partner	3,258.50	$795.00	$2,590,507.50
	Associate			
	Paralegal			
TOTALS		3,258.50	$795.00	$2,590,507.50

P = Owner/Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Alternators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	35.80	$28,461.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**35.80**	**$28,461.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	133.20	$105,894.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**133.20**	**$105,894.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	8.00	$6,360.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**8.00**	**$6,360.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Bearings
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	185.90	$147,790.50
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**185.90**	**$147,790.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	173.50	$137,932.50
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**173.50**	**$137,932.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Instrument Panel Clusters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	208.60	$165,837.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**208.60**	**$165,837.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Starters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	35.80	$28,461.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**35.80**	**$28,461.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Kakinuki Law Office, PC**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
John Kakinuki	P	$795.00	2,477.70	$1,969,771.50
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**2,477.70**	**$1,969,771.50**

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

Jon Cuneo

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

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

I, Jonathan W. Cuneo, declare as follows:

1. I am a Partner at the law firm of Cuneo Gilbert & LaDuca, LLP and am currently Interim Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs"). I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

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

August 31, 2016. The summary was prepared at my request from computerized records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Cuneo Gilbert & LaDuca, LLP in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of $110,718.61 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actions and have not been reimbursed.

6. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 42,528.45 hours. The total lodestar for my firm for this period using current hourly billing rates is $25,786,729.75

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

Executed this the 11th day of October, 2016 in Washington, D.C.

Jonathan W. Cuneo

JONATHAN W. CUNEO

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: CUNEO GILBERT & LADUCA, LLP

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	4,908.60	$4,393,197.00
Pamela Gilbert	P	$575	22.55	$12,966.25
Charles LaDuca	P	$695	17.30	$12,023.50
Joel Davidow	P	$895	2,584.55	$2,313,172.25
Charles Tiefer	OC	$800	330.15	$264,120.00
Robert Cynkar	P	$775	8.30	$6,432.50
Michael Flannery	P	$775	253.65	$196,578.75
Matthew E. Miller	P	$775	226.10	$175,227.50
David W. Stanley	P	$750	1.75	$1,312.50
Sandra Cuneo	P	$725	255.75	$185,418.75
Matthew Wiener	P	$700	1.80	$1,260.00
Daniel Cohen	P	$695	2,616.02	$1,818,131.58
Alexandra Warren	P	$650	7.80	$5,070.00
William Anderson	P	$650	12.25	$7,962.50
Preetpal Grewal	-	$575	18.95	$10,896.25
Katie Van Dyck	P	$650	501.05	$325,682.50
Jennifer Kelly	A	$575	1,653.25	$950,618.75
Victoria Romanenko	A	$575	17,067.83	$9,814,004.17
Brendan Thompson	A	$575	8.25	$4,743.75
Taylor Asen	A	$550	808.75	$444,812.50
Evelyn Li	A	$550	6,622.50	$3,642,375.00
Beatrice Yakubu	A	$550	262.75	$144,512.50
Blaine Finley	A	$500	620.80	$310,400.00
Peter Gil-Montllor	A	$500	9.25	$4,625.00
Julie Sorenson	A	$500	5.00	$2,500.00
Benjamin Elga	A	$450	422.50	$190,125.00
Anthony Carter	A	$375	17.25	$6,468.75

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Tim Powell	PL	$225	101.75	$22,893.75
Daniel Black	PL	$200	235.35	$47,070.00
Laura Cheek	PL	$200	4.00	$800.00
Ben Elga	PL	$200	5.25	$1,050.00
Dasha Gorlov	PL	$200	11.95	$2,390.00
Molly Green	PL	$200	0.25	$50.00
Daniel Howick	PL	$200	10.05	$2,010.00
Tess Illos	PL	$200	12.05	$2,410.00
Vasiliki Katsarou	PL	$200	44.50	$8,900.00
Kyle Lambrecht	PL	$200	129.25	$25,850.00
Matthew Laps	PL	$200	24.50	$4,900.00
Claire Peters	PL	$200	48.75	$9,750.00
Annie Reiner	PL	$200	62.05	$12,410.00
Gabe Stutman	PL	$200	27.10	$5,420.00
Eleanor Anthony	PL	$175	94.75	$16,581.25
Melisa Azak	PL	$175	100.00	$17,500.00
Nadia Belkin	PL	$175	575.25	$100,668.75
Ava Mehta	PL	$175	79.75	$13,956.25
Alexandra Peck	PL	$175	308.85	$54,048.75
Marie Schenk	PL	$175	935.35	$163,686.25
Annie Zanobini	PL	$175	0.50	$87.50
Chris Fisher		$120	100.50	$12,060.00
Billy Czerwinski	PL	$50	352.00	$17,600.00
TOTALS			42,528.45	$25,786,729.75

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

FIRM NAME: CUNEO GILBERT & LADUCA, LLP

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$1,801.49
Postage Charges	$18.85
Long Distance	$1,986.56
Outside Photocopying	$881.70
Travel (Transpiration, lodging, meals, etc.)	$91,216.33
Court Fees (filing, etc.)	$192.00
Professional Fees (expert/investigators, etc.)	$166.67
Witness/Service Fees	$375.00
Court Reporter/Transcripts	$1,768.65
Computer Research	$7,606.36
Miscellaneous (Describe)	$4,705.00
TOTAL	$110,718.61

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Air Conditioning Systems**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	6.00	$5,370.00
Victoria Romanenko	A	$575	15.50	$8,912.50
Evelyn Li	A	$550	3.25	$1,787.50
Ben Elga	A	$450	4.25	$1,912.50
Marie Schenk	PL	$175	2.00	$350.00
TOTALS			31.00	$18,332.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Air Conditioning Systems
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	3.48
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	10.00
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	13.48

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Air Flow Meters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Victoria Romanenko	A	$575	18.50	$10,637.50
Marie Schenk	PL	$175	0.75	131.25
TOTALS			19.25	$10,768.75

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo Gilbert & LaDuca**
Case: **Alternators**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	77.25	$69,138.75
Joel Davidow	P	$895	3.50	$3,132.50
Victoria Romanenko	A	$575	56.63	$32,564.17
Evelyn Li	A	$550	6.75	$3,712.50
Blaine Finley	A	$500	11.75	$5,875.00
Ben Elga	A	$450	8.00	$3,600.00
Dan Black	PL	$200	1.00	$200.00
Marie Schenk	PL	$175	4.25	$743.75
TOTALS			169.13	$118,966.67

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Anti-Vibration Rubber**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	81.00	$72,495.00
Joel Davidow	P	$895	17.00	$15,215.00
Katie Van Dyck	A	$650	34.00	$22,100.00
Evelyn Li	A	$550	354.00	$194,700.00
Victoria Romanenko	A	$575	87.00	$50,025.00
Blaine Finley	A	$500	8.25	$4,125.00
Daniel Black	PL	$200	1.50	$300.00
Marie Schenk	PL	$175	6.25	$1,093.75
TOTALS			589.00	$360,053.75

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	40.87
Facsimile Charges	
Long Distance	6.15
In-House Photocopying	
Outside Photocopying	164.83
Travel (Transportation, lodging, meals, etc.)	1930.62
Court Fees (filing, etc.)	9.50
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	71.06
Miscellaneous (Describe)	
TOTAL	$2,223.03

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **ATF Warmers**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	$895	0.75	$671.25
Ben Elga	A	$450	5.00	$2,250.00
Marie Schenk	PL	$175	1.75	$306.25
TOTALS			7.50	$3,227.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Auto Parts General**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	2,952.95	$2,642,890.25
Pamela Gilbert	P	$575	16.75	$9,631.25
Charles LaDuca	P	$695	8.50	$5,907.50
Joel Davidow	P	$895	924.30	$827,248.50
Charles Tiefer	OC	$800	330.15	$264,120.00
Robert Cynkar	P	$775	2.75	$2,131.25
Michael Flannery	P	$775	31.15	$24,141.25
Matthew E. Miller	P	$775	200.00	$155,000.00
David W. Stanley	P	$750	1.50	$1,125.00
Sandra Cuneo	P	$725	27.50	$19,937.50
Matthew Wiener	P	$700	0.25	$175.00
Daniel Cohen	P	$695	2,130.25	$1,480,523.75
Alexandra Warren	A	$650	2.50	$1,625.00
William Anderson	P	$650	2.50	$1,625.00
Preetpal Grewal	-	$575	2.00	$1,150.00
Katie Van Dyck	A	$650	203.95	$132,567.50
Taylor Asen	A	$550	767.75	$422,262.50
Evelyn Li	A	$550	2,408.50	$1,324,675.00
Jennifer Kelly	A	$575	1,164.10	$669,357.50
Victoria Romanenko	A	$575	8,288.50	$4,765,887.50
Brendan Thompson	A	$575	3.50	$2,012.50
Blaine Finley	A	$500	394.30	$197,150.00
Peter Gil-Montllor	A	$500	0.75	$375.00
Julie Sorenson	A	$500	5.00	$2,500.00
Beatrice Yakubu	A	$550	37.50	$20,625.00
Benjamin Elga	A	$450	188.00	$84,600.00

Anthony Carter	A	$375	17.25	$6,468.75
Tim Powell	PL	$225	61.50	$13,837.50
Daniel Black	PL	$200	93.00	$18,600.00
Laura Check	PL	$200	1.00	$200.00
Dasha Gorlov	PL	$200	2.00	$400.00
Daniel Howick	PL	$200	3.75	$750.00
Tess Illos	PL	$200	10.00	$2,000.00
Vasiliki Katsarou	PL	$200	0.50	$100.00
Kyle Lambrecht	PL	$200	128.00	$25,600.00
Matthew Laps	PL	$200	12.50	$2,500.00
Claire Peters	PL	$200	21.75	$4,350.00
Annie Reiner	PL	$200	33.50	$6,700.00
Gabe Stutman	PL	$200	6.75	$1,350.00
Eleanor Anthony	PL	$175	94.75	$16,581.25
Melisa Azak	PL	$175	100.00	$17,500.00
Nadia Belkin	PL	$175	533.00	$93,275.00
Ava Mehta	PL	$175	29.25	$5,118.75
Alexandra Peck	PL	$175	308.85	$54,048.75
Marie Schenk	PL	$175	651.75	$114,056.25
Annie Zanobini	PL	$175	0.50	$87.50
Chris Fisher	PL	$175	89.00	$10,680.00
Billy Czerwinski	PL	$175	352.00	$17,600.00
TOTALS			22,645.50	$13,471,047.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Ben Elga	A	$450	5.00	$2,250.00
TOTALS			5.00	$2,250.00

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Automotive Hoses
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	13.26
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	13.26

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Bearings**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	116.25	104,043.75
Joel Davidow	P	$895	181.25	$162,218.75
Michael Flannery	P	$775	2.50	$1,937.50
Matthew E. Miller	P	$775	6.75	$5,231.25
Daniel Cohen	P	$695	301.50	$209,542.50
Katie Van Dyck	A	$650	17.00	11,050.00
Taylor Asen	A	$550	41.00	$22,550.00
Evelyn Li	A	$550	859.00	472,450.00
Jennifer Kelly	A	$575	102.00	$58,650.00
Victoria Romanenko	A	$575	479.25	$275,568.75
Peter Gil-Montllor	A	$500	7.50	$3,750.00
Beatrice Yakubu	A	$550	72.00	$39,600.00
Benjamin Elga	A	$450	93.25	$41,962.50
Tim Powell	PL	$225	12.50	$2,812.50
Daniel Black	PL	$200	27.50	$5,500.00
Dasha Gorlov	PL	$200	3.00	$600.00
Matthew Laps	PL	$200	7.75	$1,550.00
Marie Schenk	PL	$175	48.25	$8,443.75
Chris Fisher	PL	$175	11.50	$1,380.00
TOTALS			2,389.75	$1,428,841.25

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	69.47
Postage Charges	
Facsimile Charges	
Long Distance	65.93
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	10,577.11
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	105.30
Computer Research	564.45
Miscellaneous (Describe)	
TOTAL	$11,382.26

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Electronic Power Steering Assembly**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	1.00	$895.00
Joel Davidow	P	$895	1.00	$895.00
Evelyn Li	A	$550	69.00	$37,950.00
Victoria Romanenko	A	$575	53.75	$30,906.25
Peter Gil-Montllor	A	$500	1.00	500.00
Ben Elga	PL	$425	4.50	$2,025.00
Marie Schenk	PL	$175	1.75	$306.25
TOTALS			132.00	$73,477.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	2.07
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	$1,164.64
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	$1,166.71

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	40.87
Facsimile Charges	
Long Distance	6.15
In-House Photocopying	
Outside Photocopying	164.83
Travel (Transportation, lodging, meals, etc.)	1930.62
Court Fees (filing, etc.)	9.50
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	71.06
Miscellaneous (Describe)	
TOTAL	$2,223.03

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception –August 31, 2015**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Victoria Romanenko	A	$575	5.75	$3,306.25
Marie Schenk	PL	$175	1.00	$175.00
TOTALS			6.75	$3,481.25

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

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

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: Fan Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Victoria Romanenko	A	$575	1.25	$718.75
Evelyn Li	A	$550	3.75	$2,062.50
Blaine Finley	A	$500	12.50	$6,250.00
Ben Elga	A	$450	1.00	$450.00
Nadia Belkin	PL	$175	0.50	$87.50
TOTALS			19.00	$9,568.75

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Fuel Injection System**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	895	3.75	$3,356.25
Victoria Romanenko	A	$575	67.75	$38,956.25
Evelyn Li	A	$550	46.00	$25,300.00
Marie Schenk	PL	$175	1.00	175.00
TOTALS			118.50	$67,787.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Fuel Injection Systems
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	124.36
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	124.36

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Fuel Senders**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	76.05	$68,064.75
Pamela Gilbert	P	$575	0.35	$201.25
Charles LaDuca	P	$695	0.35	$243.25
Joel Davidow	P	$895	14.65	$13,111.75
Robert Cynkar	P	$775	0.35	$271.25
Michael Flannery	P	$775	4.50	$3,487.50
Matthew E. Miller	P	$775	1.20	$930.00
Matthew Wiener	P	$700	0.10	$70.00
Daniel Cohen	P	$695	22.65	$15,741.75
Alexandra Warren	A	$650	0.10	$65.00
Katie Van Dyck	A	$650	8.25	$5,362.50
Jennifer Kelly	A	$575	15.10	$8,682.50
Victoria Romanenko	A	$575	491.25	$282,468.75
Brendan Thompson	A	$575	0.25	$143.75
Evelyn Li	A	$550	141.25	$77,687.50
Beatrice Yakubu	A	$550	0.25	$137.50
Benjamin Elga	A	$450	0.75	$337.50
Tim Powell	LC	$225	1.50	$337.50
Daniel Black	PL	$200	1.20	$240.00
Laura Cheek	PL	$200	0.25	$50.00
Benjamin Elga	PL	$200	0.25	$50.00
Dasha Gorlov	PL	$200	0.35	$70.00
Daniel Howick	PL	$200	0.10	$20.00
Tess Illos	PL	$200	0.55	$110.00
Kyle Lambrecht	PL	$200	0.25	$50.00
Claire Peters	PL	$200	0.25	$50.00
Annie Reiner	PL	$200	3.60	$720.00
Gabe Stutman	PL	$200	5.20	$1,040.00
Marie Schenk	PL	$175	21.00	$3,675.00
TOTALS			811.90	$483,419.00

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Heater Control Panels**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	69.70	$62,381.50
Pamela Gilbert	P	$575	0.35	$201.25
Charles LaDuca	P	$695	0.60	$417.00
Joel Davidow	P	$895	42.00	$37,590.00
Robert Cynkar	P	$775	0.60	$465.00
Michael Flannery	P	$775	5.45	$4,223.75
Matthew E. Miller	P	$775	0.95	$736.25
Matthew Wiener	P	$700	0.10	$70.00
Daniel Cohen	P	$695	23.20	$16,124.00
Alexandra Warren	A	$650	0.35	$227.50
William Anderson	P	$650	0.25	$162.50
Katie Van Dyck	A	$650	51.00	$33,150.00
Evelyn Li	A	$550	75.00	$41,250.00
Jennifer Kelly	A	$575	1.10	$632.50
Victoria Romanenko	A	$575	683.30	$392,897.50
Brendan Thompson	A	$575	0.50	$287.50
Beatrice Yakubu	A	$550	0.50	$275.00
Benjamin Elga	A	$450	2.25	$1,012.50
Daniel Black	PL	$200	27.70	$5,540.00
Laura Check	PL	$200	0.25	$50.00
Ben Elga	PL	$200	0.25	$50.00
Dasha Gorlov	PL	$200	0.60	$120.00
Daniel Howick	PL	$200	0.35	$70.00
Tess Illos	PL	$200	0.70	$140.00
Kyle Lambrecht	PL	$200	0.25	$50.00
Claire Peters	PL	$200	0.25	$50.00
Annie Reiner	PL	$200	3.70	$740.00
Gabe Stutman	PL	$200	5.20	$1,040.00
Marie Schenk	PL	$175	4.75	$831.25
TOTALS			1,001.20	$600,785.00

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	491.80
Postage Charges	2.72
Facsimile Charges	
Long Distance	52.17
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	3046.86
Court Fees (filing, etc.)	192.00
Professional Fees (expert/investigators, etc.)	166.67
Witness/Service Fees	
Court Reporter/Transcripts	13.65
Computer Research	450.09
Miscellaneous (Describe) Translation	4705.00
TOTAL	9120.96

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **HID Ballasts**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Joel Davidow	P	$895	16.00	$14,320.00
Victoria Romanenko	A	$575	14.50	$8,337.50
Evelyn Li	A	$550	2.50	$1,375.00
Nadia Belkin	PL	$175	19.00	$3,325.00
Marie Schenk	PL	$175	0.50	$87.50
TOTALS			52.50	$27,445.00

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Ignition Coils**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	$895	7.50	$6,712.50
Joel Davidow	P	$895	3.50	$3,132.50
Daniel Cohen	P	$695	2.50	$1,737.50
Katie Van Dyck	A	$650	3.25	$2,112.50
Victoria Romanenko	A	$575	38.50	$22,137.50
Evelyn Li	A	$550	27.50	$15,125.00
Ben Elga	A	$425	1.00	450.00
Marie Schenk	PL	$175	2.00	$350.00
TOTALS			85.75	$51,757.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Inverters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Victoria Romanenko	A	$575	57.25	$32,918.75
Evelyn Li	A	$550	21.75	$11,962.50
Ben Elga	A	$450	0.75	$337.50
Marie Schenk	PL	$175	0.25	$43.75
TOTALS			80.00	$45,262.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	223.80	$200,301.00
Pamela Gilbert	P	$575	0.60	$345.00
Charles LaDuca	P	$695	0.60	$417.00
Joel Davidow	P	$895	111.15	99,479.25
Robert Cynkar	P	$775	0.60	$465.00
Michael Flannery	P	$775	5.20	$4,030.00
Matthew E. Miller	P	$775	1.45	$1,123.75
Sandra Cuneo	P	$725	76.25	$55,281.25
Matthew Wiener	P	$700	0.10	$70.00
Daniel Cohen	P	$695	22.92	$15,927.08
Alexandra Warren	A	$650	0.35	$227.50
William Anderson	P	$650	0.25	$162.50
Katie Van Dyck	A	$650	89.75	$58,337.50
Jennifer Kelly	A	$575	112.35	$64,601.25
Victoria Romanenko	A	$575	1,070.70	$615,652.50
Brendan Thompson	A	$575	0.50	$287.50
Evelyn Li	A	$550	178.00	$97,900.00
Ben Elga	A	$450	0.75	$70,950.00
Beatrice Yakubu	A	$550	129.00	$337.50
Daniel Black	PL	$200	46.70	$9,340.00
Laura Cheek	PL	$200	0.25	$50.00
Benjamin Elga	PL	$200	0.25	$50.00
Dasha Gorlov	PL	$200	0.50	$100.00
Daniel Howick	PL	$200	2.60	$520.00
Tess Illos	PL	$200	0.55	$110.00
Kyle Lambrecht	PL	$200	0.25	$50.00
Matthew Laps	PL	$200	3.25	$650.00
Claire Peters	PL	$200	0.25	$50.00
Annie Reiner	PL	$200	3.00	$600.00
Gabe Stutman	PL	$200	4.70	$940.00
Marie Schenk	PL	$175	12.50	$2,187.50
TOTALS			2,099.12	$1,300,543.08

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Motor Generators**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	$895	0.50	$447.50
Victoria Romanenko	A	$575	42.75	$24,581.25
Evelyn Li	A	$550	1.50	$825.00
Marie Schenk	PL	$175	1.00	$175.00
TOTALS			45.75	$26,028.75

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Power Window Motor**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Victoria Romanenko	A	$575	1.50	$862.50
Evelyn Li	A	$550	0.50	$275.00
Blaine Finley	A	$500	33.75	$16,875.00
TOTALS			35.75	$18,012.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Radiators**
Reporting Period: **Inception –August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	53.60	$47,972.00
Joel Davidow	P	$895	1.00	$895.00
Katie Van Dyck	A	$650	13.25	$8,612.50
Victoria Romanenko	A	$575	18.50	$10,637.50
Evelyn Li	A	$550	4.00	$2,200.00
Nadia Belkin	PL	$175	0.25	$43.75
Marie Schenk	PL	$175	0.35	$61.25
TOTALS			90.95	$70,422.00

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Radiators
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	16.35
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	14.00
Miscellaneous (Describe)	
TOTAL	30.35

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: Spark Plugs
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Ben Elga	A	$450	0.75	$337.50
TOTALS			0.75	$337.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo Gilbert & LaDuca**
Case: **Starters/Generators**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	63.75	$57,056.25
Joel Davidow	P	$895	1.50	$1,342.50
Victoria Romanenko	A	$575	52.25	$30,043.75
Evelyn Li	A	$550	6.00	$3,300.00
Tim Powell	LC	$225	2.50	$562.50
Dan Black	PL	$200	1.00	200.00
Marie Schenk	PL	$175	1.50	$262.50
TOTALS			128.50	$92,767.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Switches**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	2.00	$1,790.00
Katie Van Dyck	A	$650	10.50	$6,825.00
Victoria Romanenko	A	$575	30.00	$17,250.00
Evelyn Li	A	$550	23.50	$12,925.00
Ben Elga	A	$450	0.75	$337.50
TOTALS			66.75	$39,127.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Valve Timing Controls**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	9.00	$8,055.00
Victoria Romanenko	A	$575	46.25	$26,593.75
Evelyn Li	A	$550	41.75	$22,962.50
Benjamin Elga	A	$450	1.50	$675.00
TOTALS			98.50	$58,286.25

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Windshield Washer Systems**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Joel Davidow	P	$895	0.50	$447.50
Victoria Romanenko	A	$575	4.25	$2,443.75
Evelyn Li	A	$550	0.50	$275.00
TOTALS			5.25	$3,166.25

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Case: Windshield Washer Systems
Reporting Period: **Inception to August 31, 2016**

EXPENSE	**AMOUNT**
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	36.52
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	66.86
Miscellaneous (Describe)	
TOTAL	103.38

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Windshield Wiper Systems Parts**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan Cuneo	P	$895	3.00	$2,685.00
Joel Davidow	P	$895	1.00	$895.00
Victoria Romanenko	A	$575	43.50	$2,5012.50
Evelyn Li	A	$550	45.75	$25,162.50
Ben Elga	A	$450	1.25	$562.50
TOTALS			94.50	$54,317.50

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Cuneo, Gilbert & LaDuca, LLP**
Case: **Wire Harness**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours	Total Lodestar
Jonathan W. Cuneo	P	$895	1,160.75	$1,038,871.25
Pamela Gilbert	P	$575	4.50	$2,587.50
Charles LaDuca	P	$695	7.25	$5,038.75
Joel Davidow	P	$895	1,266.20	$1,133,249.00
Robert Cynkar	P	$775	4.00	$3,100.00
Michael Flannery	P	$775	204.85	$158,758.75
Matthew E. Miller	P	$775	15.75	$12,206.25
David W. Stanley	P	$750	0.25	$187.50
Sandra Cuneo	P	$725	152.00	$110,200.00
Matthew Wiener	P	$700	1.25	$875.00
Daniel Cohen	P	$695	113.00	$78,535.00
Alexandra Warren	A	$650	4.50	$2,925.00
William Anderson	P	$650	9.25	$6,012.50
Preetpal Grewal		$575	16.95	$9,746.25
Katie Van Dyck	A	$650	70.10	$45,565.00
Jennifer Kelly	A	$575	258.60	$148,695.00
Victoria Romanenko	A	$575	5,399.45	$3,104,683.75
Brendan Thompson	A	$575	3.50	$2,012.50
Evelyn Li	A	$550	2,302.75	$1,266,512.50
Beatrice Yakubu	A	$550	23.50	$12,925.00
Blaine Finley	A	$500	160.25	$80,125.00
Benjamin Elga	A	$450	96.75	$43,537.50
Time Powell	LC	$225	23.75	$5,343.75
Daniel Black	PL	$200	35.75	$7,150.00
Laura Cheek	PL	$200	2.25	$450.00
Benjamin Elga	PL	$200	4.50	$900.00
Dasha Gorlov	PL	$200	5.50	$1,100.00
Molly Green	PL	$200	0.25	$50.00
Daniel Howick	PL	$200	3.25	$650.00
Tess Illos	PL	$200	0.25	$50.00

Vasiliki Katsarou	PL	$200	44.00	$8,800.00
Kyle Lambrecht	PL	$200	0.50	$100.00
Matthew Laps	PL	$200	1.00	$200.00
Claire Peters	PL	$200	26.25	$5,250.00
Annie Reiner	PL	$200	18.25	$3,650.00
Gabe Stutman	PL	$200	5.25	$1,050.00
Nadia Belkin	PL	$175	22.50	$3,937.50
Ava Mehta	PL	$175	50.50	$8,837.50
Marie Schenk	PL	$175	172.75	$30,231.25
TOTALS			11,691.90	$7,344,099.00

Marie Thomas re
Court Restricted Fund Expences

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):	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE *HOSES; POWER WINDOW* SWITCHES; AND CERAMIC SUBSTRATES	:	Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to:	:	Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS	:	

DECLARATION OF MARIE THOMAS IN SUPPORT OF AUTOMOBILE DEALERS INTERIM CO-LEAD COUNSEL'S MOTION FOR AN AWARD OF COURT RESTRICTED FUND EXPENSES

I, Marie Thomas, declare as follows:

1. I am the Accounting Manager for Barrett Law Group, P.A. I submit this Declaration of Support OF Automobile Dealers Interim Co-Lead Counsel's Motion for an award of expenses in the above styled and numbered cases.

2. On December 7, 2015, this Court entered an order granting the Auto Dealers' request to establish a fund for future litigation expenses in the amount of $2,947,395, to be used for future litigation expenses in the cases at issue in the settlements before the Court at that time (Doc.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 Class Counsel the "Court-Restricted Fund."

4. From the original amount of $2,947,395.00, plus interest received of $135.22, a total of $2,481,748.53 has been expended, all in accordance with the directions of the Court in its said Order of December 7, 2005, and a total of $465,781.69 remains in this Court-Restricted Fund. All of such expenditures were reasonable and necessary for the prosecution of these cases at issue.

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

6. Attached as Exhibit B is an iteminzation of the amount totaling $485,589.25 for the expenses reimbursed quarterly of Co-Counsel from the Court-Restricted Fund.

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

Executed this 12 day of October, 2016.

Marie Thomas

Marie Thomas
BARRETT LAW GROUP, PA
404 Court Square North
Lexington, MS 39095
Office 662.834.2488
mthomas@barrettlawgroup.com

STATE OF MISSISSIPPI;
COUNTY OF HOLMES;

SUBSCRIBED AND SWORN TO BEFORE ME ON 12TH DAY OF OCTOBER, 2016.

Catherine Barnes

NOTARY PUBLIC, State of MS
My Commission expires: Aug. 3, 2020

EXHIBIT A

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

FIRM NAME: BARRETT LAW GROUP, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

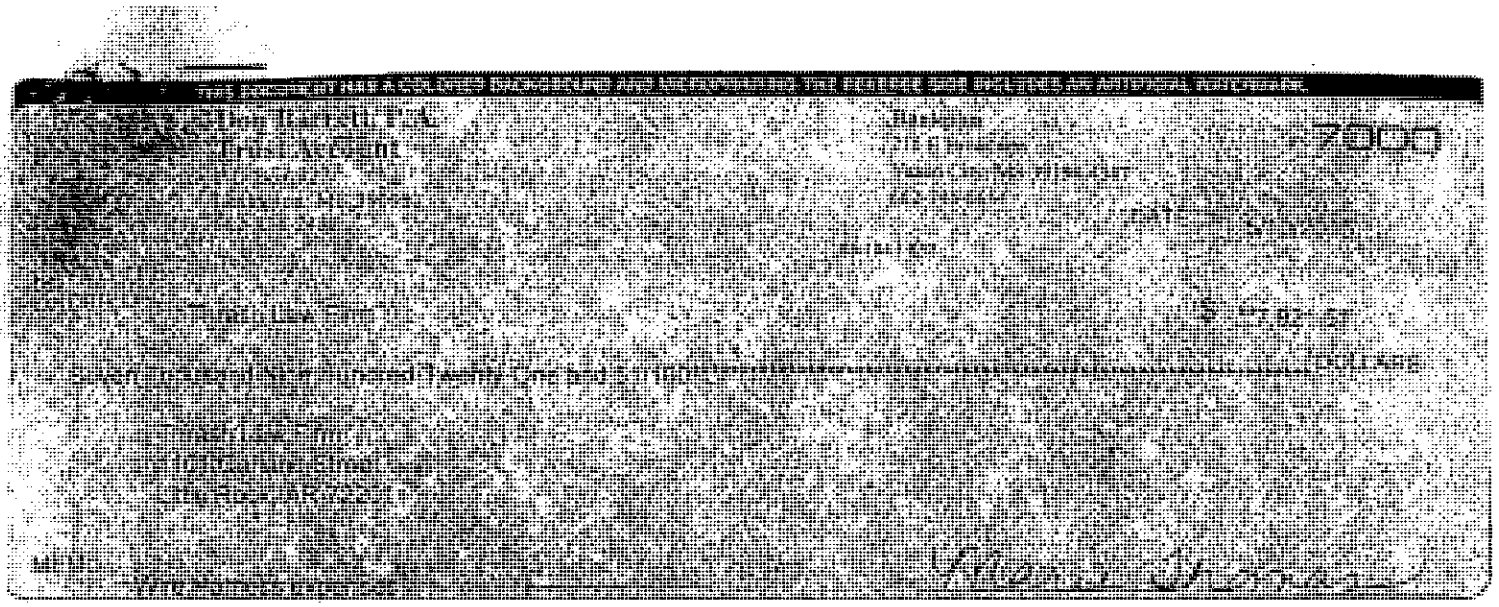
EXPENSE	AMOUNT
Mediation	27,669.98
Postage Charges	4,778.47
Translations	41,806.54
Long Distance	
Expense reimb quarterly of Co-Counsel	$485,589.25
Experts	61,801.57
Travel (Transporation, lodging, meals, etc.) depositions	117,920.54
Purchase Price of Dataset	625,000.00
Professional Fees (expert/investigators, etc.)	
Document Hosting	921,255.94
Court Reporter/Transcripts	130,991.52
Document Production/Scanning	64,934.72
Miscellaneous (Describe)	
TOTAL	2,481,748.53

EXHIBIT B

IN RE: AUTOMOTIVE PARTS COURT RESTRICTED FUND

FIRM NAME: BARRETT LAW GROUP, PA

EXPENSE REIMBURSEMENT QUARTERLY OF CO-COUNSEL



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Don Barrett, P.A. 7000

Thrash Law Firm		5/10/2016	
215 · Trust Account Liability	Wire Harness Expenses after 12/15/15 and before 04/1/16		7,921.51

BankPlus Trust/IOLTA Wire Harness expenses 7,921.51

Don Barrett, P.A. 7000

Thrash Law Firm		5/10/2016	
215 · Trust Account Liability	Wire Harness Expenses after 12/15/15 and before 04/1/16		7,921.51

BankPlus Trust/IOLTA Wire Harness expenses 7,921.51

Marie Thomas

From:	tomthrash@sbcglobal.net
Sent:	Monday, May 09, 2016 4:08 PM
To:	Don BarrettPA
Cc:	Tom Thrash; Marie Thomas
Subject:	Wire Harness
Attachments:	EXPENSES (2016).docx

Don/Marie:

Attached are our firm Wire Harness expenses from the date of the last submission – 9/26/15 through 5/9/16.

The Assessments are noted, but are not counted into the total. #7981.5

Please place in line for payment.

Thank you.

Thomas P. Thrash
Cydni Arterbury, Legal Assistant
THRASH LAW FIRM, P.A.
1101 Garland Street
Little Rock, AR 72201
(501) 374-1058 – Telephone
(501) 374-2222 – Facsimile
www.thrashlawfirmpa.com

WIRE HARNESS EXPENSES
9/26/15 forward

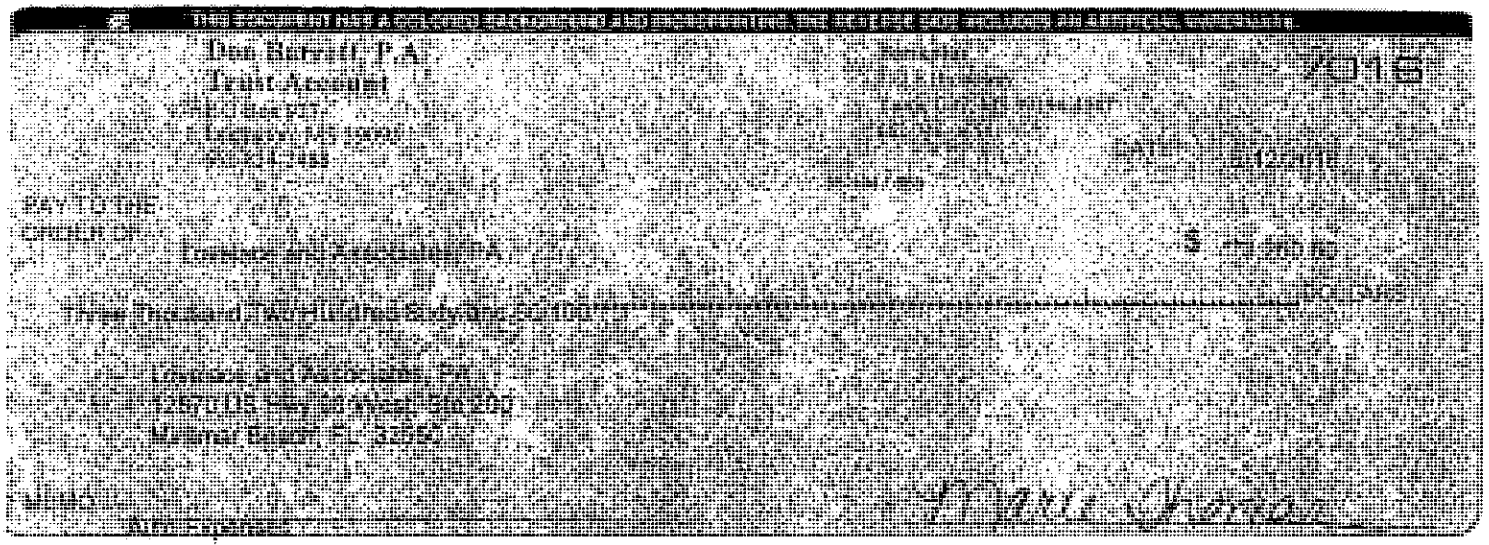
Date	TPT/MB	To	Amount	Reason
10/16/15	TPT	N/A	$18.00	Travel to Landers
10/21/15	TPT	N/A	$678.22	Travel to Nashville, TN for Meeting
10/30/15	TPT	Barrett Trust Account	$6,000.00	Assessment
1/18/16	TPT	N/A	$12.00	Travel to Landers
1/28/16	TPT	Barrett Trust Account	$6,000.00	Assessment
2/2/16	TPT	N/A	$12.00	Travel to Landers
2/3/16	TPT	N/A	$12.00	Travel to Landers
2/3/16	TPT	Sam's Club	$106.66	Supplies for Document Copying
2/5/16	MB	U.S. Post Office	$41.00	Passport
2/8/16	TPT	N/A	$12.00	Travel to Landers
2/9/16	MB	Subway	$10.00	Metrocard
2/11/16	TPT	N/A	$8.40	Travel to Landers
2/11/16	TPT	N/A	$13.20	Travel to Landers
2/12/16	MB	Passport	$110.00	Passport Application
2/12/16	MB	Grand Hyatt	$971.17	Hotel - Depositions
2/12/16	MB	Grand Hyatt Market	$4.36	Meal – Depositions
2/12/16	MB	Cab	$60.00	Depositions
3/2-9/16	MB	Hampton Inn	$1,080.40	Depositions
3/2/16	MB	Cab	$21.28	Depositions
3/2/16	MB	Cab	$15.83	Depositions
3/2/16	MB	Union Station	$10.00	Train Ticket – Depositions
3/2/16	MB	BlackFinn Ameripub	$14.01	Meal - Depositions
3/3/16	MB	BlackFinn Ameripub	$33.20	Meal - Depositions
3/4/16	MB	Café Kiosk	$15.49	Meal - Depositions
3/5/16	MB	Cab	$30.00	Depositions
3/5/16	MB	Cibo Express	$2.65	Meal - Depositions
3/5/16	MB	Airport Coffee	$2.41	Meal – Depositions
3/5/16	MB	Cab	$35.00	Depositions
3/5/16	MB	McDonald's	$6.02	Meal – Depositions
3/15/16	MB	Southwest Airlines	$40.00	Flight - Depositions
3/15/16	MB	Southwest Black Hound	$37.67	Meal - Depositions
3/15/16	MB	Cab	$61.61	Depositions
3/15/16	MB	Giant American Bagel	$2.39	Meal – Depositions
3/15/16	MB	Hudson Produce	$4.36	Meal - Depositions
3/16/16	MB	MTA NYC Transit	$10.00	Metrocard – Subway
3/16/16	MB	Mighty Quinn's	$15.12	Meal – Depositions
3/17/16	MB	Southwest Airlines	$825.47	Flight - Depositions

3/17/16	MB	Morton's Steakhouse	$112.49	Meal – Depositions
3/17/16	MB	MTA NYC Transit	$20.00	Metrocard - Depositions
3/17/16	MB	Hudson Produce	$3.09	Meal - Depositions
3/18/16	MB	Southwest Black Hound	$35.67	Meal - Depositions
3/18/16	MB	Hudson Produce	$6.67	Meal - Depositions
3/18/16	MB	Hudson Produce	$7.60	Meal - Depositions
3/19/16	MB	Pick a Bagel	$12.89	Meal - Depositions
3/19/16	MB	Chili's Grill & Bar	$27.22	Meal - Depositions
3/19/16	MB	Clinton Airport	$70.85	Parking - Depositions
3/19/16	MB	Taxi	$46.56	Depositions
3/27/16	MB	Kum & Go	$14.00	Gas - Depositions
3/27/16	MB	Enterprise	$834.89	Car Rental - Depositions
3/27-29/16	MB	Hampton Inn	$314.78	Hotel - Depositions
3/28/16	MB	Southwest Airlines	$337.97	Flight - Depositions
3/28-29/16	TPT	N/A	$459.00	Travel to Lee's Summit for Deposition – 765 mi @ 60¢ per mile
3/28/16	TPT	Burger King	$13.56	Meal (Tina Chandler Depo)
3/29/16	MB	Paradie Shops – Airport	$3.27	Meal - Depositions
3/29/16	MB	Timberline Grill	$26.10	Meal - Depositions
3/29/16	TPT	Hampton Inn	$314.78	Hotel (Tina Chandler Depo)
3/29/16	TPT	Chik-fil-A	$10.71	Meal (Tina Chandler Depo)
3/29/16 - 4/2/16	MB	Hyatt	$975.90	Hotel - Depositions
3/30/16	TPT	Texas Secretary of State	$2.05	Entity Search for Legal Entity Names for Claim Forms
3/30/16	TPT	Texas Secretary of State	$8.22	Entity Search for Legal Entity Names for Claim Forms
3/30/16	MB	Cheesecake Factory	$23.58	Meal - Depositions
3/30/16	MB	Yellow Cab	$54.00	Taxi - Depositions
3/31/16	MB	Southwest Airlines	$549.96	Flight - Depositions
4/2/16	MB	Southwest Airlines	$40.00	Flight - Depositions
4/2/16	MB	Chili's	$24.22	Meal - Depositions
4/2/16	MB	Yellow Cab	$54.25	Depositions
4/6/16	TPT	N/A	$18.00	Travel to Landers Toyota – 30 Miles
4/13/16	MB	Black Pearl	$20.11	Taxi – Depositions
4/13/16	MB	Union Station	$10.00	Metrorail - Depositions
4/13/16	MB	Blue Smoke	$23.00	Meal - Depositions
4/13/16	MB	Box Frites	$6.75	Meal – Depositions
4/14/16	MB	BlackFinn Ameripub	$27.20	Meal – Depositions
4/16/16	MB	Cibo Express	$2.65	Meal – Depositions
4/16/16	MB	VIP Cab	$17.30	Depositions
4/16/16	MB	HMS – Airport	$9.83	Meal – Depositions

4/16/16	MB	Clinton Airport	$56.68	Parking – Depositions
4/22/16	TPT	Barrett Trust Account	$6,000.00	Assessment
4/26/16	MB	FedEx Office	$24.06	Supplies - Depositions
4/26/16	MB	Stack City Burger Bar	$20.97	Meal - Depositions
4/26/16	MB	Orange Cab	$28.37	Cab - Depositions
4/26/16	MB	Southwest Airlines	$337.97	Flight - Depositions
4/27/16	MB	Rodizio Grill	$68.32	Meal – Depositions
4/29/16	MB	Courtyard Marriott	$675.73	Hotel - Depositions
4/29/16	MB	Chili's	$29.80	Meal - Depositions
4/29/16	MB	Enterprise	$119.87	Rental Car - Depositions
4/30/16	MB	Stack City Burger	$21.47	Meal - Depositions
5/2/16	MB	Little Rock Airport	$56.68	Parking - Depositions
5/2/16	TPT	Kitterman Law Firm	$94.86	Postage – Claim Forms
5/2/16	TPT	N/A	$1,101.40	Photocopies 5,507 B/W Copies @ 20¢ each
5/2/16	TPT	N/A	$2.10	Photocopies 6 Color Copies @ 35¢ each
TOTAL			**$11,509.32**	

Ct rest 12/12/15 thru 03/30/16	Total	Not Paid
$12.00	$18.00	$18.00
$12.00	$678.22	$678.22
$12.00		$40.00
$106.66	$12.00	$24.22
$41.00		$54.25
$12.00	$12.00	$18.00
$10.00	$12.00	$20.11
$8.40	$106.66	$10.00
$13.20	$41.00	$23.00
$110.00	$12.00	$6.75
$971.17	$10.00	$27.20
$4.36	$8.40	$2.65
$60.00	$13.20	$17.30
$1,080.40	$110.00	$9.83
$21.28	$971.17	$56.68
$15.83	$4.36	
$10.00	$60.00	$24.06
$14.01	$1,080.40	$20.97
$33.20	$21.28	$28.37
$15.49	$15.83	$337.97
$30.00	$10.00	$68.32
$2.65	$14.01	$675.73
$2.41	$33.20	$29.80
$35.00	$15.49	$119.87
$6.02	$30.00	$21.47
$40.00	$2.65	$56.68
$37.67	$2.41	$94.86
$61.61	$35.00	$1,101.40
$2.39	$6.02	$2.10
$4.36	$40.00	
$10.00	$37.67	$3,587.81
$15.12	$61.61	
$825.47	$2.39	
$112.49	$4.36	
$20.00	$10.00	
$3.09	$15.12	
$35.67	$825.47	
$6.67	$112.49	

$7.60	$20.00
$12.89	$3.09
$27.22	$35.67
$70.85	$6.67
$46.56	$7.60
$14.00	$12.89
$834.89	$27.22
$314.78	$70.85
$337.97	$46.56
$459.00	$14.00
$13.56	$834.89
$3.27	$314.78
$26.10	$337.97
$314.78	$459.00
$10.71	$13.56
$975.90	$3.27
$2.05	$26.10
$8.22	$314.78
$23.58	$10.71
$54.00	$975.90
$549.96	$2.05
	$8.22
$7,921.51	$23.58
	$54.00
	$549.96
	$40.00
	$24.22
	$54.25
	$18.00
	$20.11
	$10.00
	$23.00
	$6.75
	$27.20
	$2.65
	$17.30
	$9.83
	$56.68
	$24.06



"7016" "065301948: 602002663 6"

Don Barrett, P.A. 7016

Lovelace and Associates, PA 5/12/2016

215 · Trust Account Liability	Auto - Wire Harness - 1st quarter 2016 -- Ct Rest.	3,260.60
BankPlus Trust/IOLTA Auto Expenses		3,260.60

Don Barrett, P.A. 7016

Lovelace and Associates, PA 5/12/2016

215 · Trust Account Liability	Auto - Wire Harness - 1st quarter 2016 -- Ct Rest.	3,260.60
BankPlus Trust/IOLTA Auto Expenses		3,260.60

AUTO PARTS GENERAL LITIGATION - EXPENSES

- [x] Auto Parts General
- [ ] Wire Harness
- [ ] Instrument Panel Clusters
- [ ] Fuel Senders
- [ ] Heater Control Panels
- [ ] Bearings
- [ ] Occupant Safety Systems

Firm Name: LOVELACE AND ASSOCIATES, P.A.

Month Ended: Dec 2015

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Assessment Payment		
Federal Express, Local Courier, etc.		
Postage Charges		
Facsimile Charges		
Long Distance	$79.80	
In-House Photocopying	$119.75	
Outside Photocopying		
Travel (transportation, lodging, meals, etc.) Depo Training Nashville		
Court Fees (filing, etc.)		
Professional Fees (expert/investigators, etc.)		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	$199.55	$0.00

AUTO PARTS GENERAL LITIGATION - EXPENSES

- [x] Auto Parts General
- [ ] Wire Harness
- [ ] Instrument Panel Clusters
- [ ] Fuel Senders
- [ ] Heater Control Panels
- [ ] Bearings
- [ ] Occupant Safety Systems

Firm Name: LOVELACE AND ASSOCIATES, P.A.

Month Ended: Jan 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Assessment Payment		
Federal Express, Local Courier, etc.	$55.87	
Postage Charges		
Facsimile Charges		
Long Distance	$35.40	
In-House Photocopying	$203.25	
Outside Photocopying		
Travel (transportation, lodging, meals, etc.)		
Court Fees (filing, etc.)		
Professional Fees (expert/investigators, etc.)		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	**$294.52**	**$0.00**

- [x] Auto Parts General
- [ ] Wire Harness
- [ ] Instrument Panel Clusters
- [ ] Fuel Senders
- [ ] Heater Control Panels
- [ ] Bearings
- [ ] Occupant Safety Systems

Firm Name: LOVELACE AND ASSOCIATES, P.A.

Month Ended: Feb 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Assessment Payment		
Federal Express, Local Courier, etc.		
Postage Charges		
Facsimile Charges		
Long Distance	$245.40	
In-House Photocopying	$202.50	
Outside Photocopying		
Travel (transportation, lodging, meals, etc.) Travel to CA for Claim Form Process Meetings	$2,251.47	
Court Fees (filing, etc.)		
Professional Fees (expert/investigators, etc.)		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	**$2,699.37**	**$0.00**

- [x] Auto Parts General
- [ ] Wire Harness
- [ ] Instrument Panel Clusters
- [ ] Fuel Senders
- [ ] Heater Control Panels
- [ ] Bearings
- [ ] Occupant Safety Systems

Firm Name: LOVELACE AND ASSOCIATES, P.A.

Month Ended: Mar 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Assessment Payment		
Federal Express, Local Courier, etc.		
Postage Charges	$67.16	
Facsimile Charges		
Long Distance		
In-House Photocopying		
Outside Photocopying		
Travel (transportation, lodging, meals, etc.)		
Court Fees (filing, etc.)		
Professional Fees (expert/investigators, etc.)		
Witness/Service Fees		
Court Reporter/Transcripts		
Computer Research		
Miscellaneous (Describe)		
CURRENT TOTAL	$67.16	$0.00

Marie Thomas

From: DML <dml@lovelacelaw.com>
Sent: Wednesday, May 11, 2016 4:38 PM
To: Don BarrettPA; 'donbarrettpa@gmail.com'; Marie Thomas
Cc: Sparky Lovelace
Subject: Lovelace and Associates Expenses - Dec - Mar 2016
Attachments: LLADEC-MAR2016EXP.PDF

Please see attached, totaling $3,260.60.

Thanks,
Sandy L. Rosenthal
Legal Assistant
Lovelace and Associates, P.A.
12870 US Hwy 98 West
Suite 200
Miramar Beach, FL 32550
Phone: 850-837-6020
Fax: 850-837-4093

Marie Thomas

From: Don Barrett <donbarrettpa@gmail.com>
Sent: Thursday, May 12, 2016 7:35 AM
To: Marie Thomas
Cc: Jonathan W. Cuneo; Shawn Raiter
Subject: Fwd: Lovelace and Associates Expenses - Dec - Mar 2016
Attachments: LLADEC-MAR2016EXP.PDF; ATT00001.htm

Pay from restricted fund

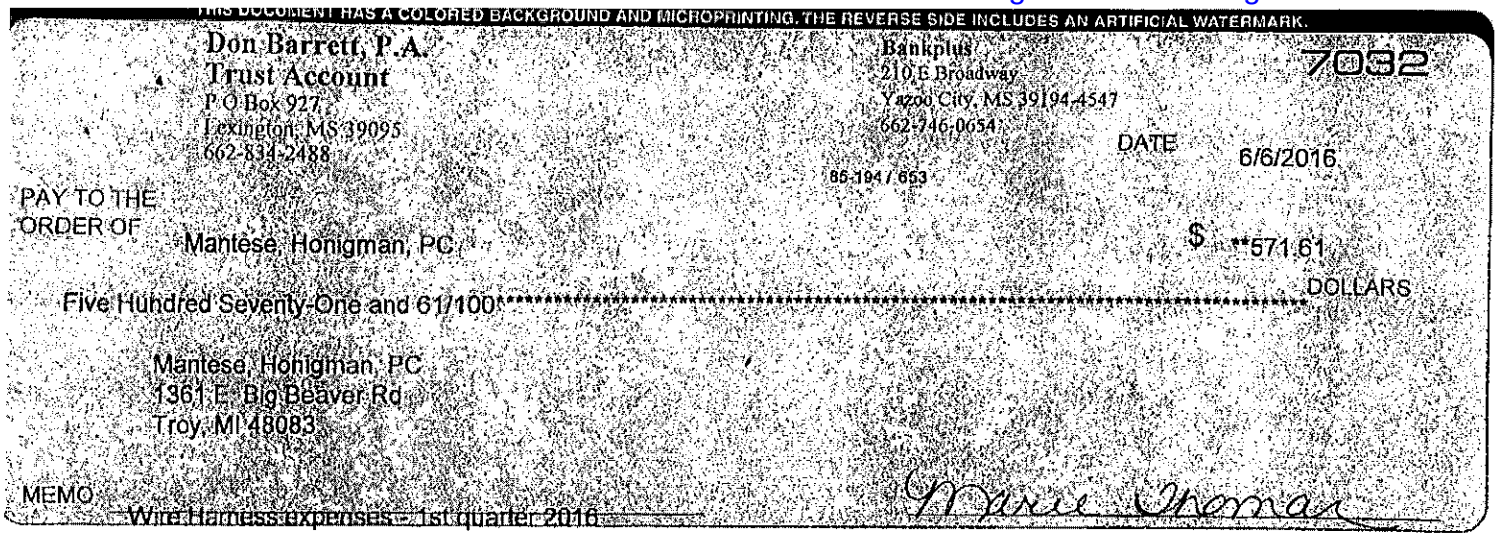
Don Barrett
Barrett Law Group, P.A.
404 Court Square
Post Office Box 927
Lexington, MS 39095
Office tel. 662.834.2488
Home: 662.834.3044
Cell: 850.797.2574
iPhone: donbarrettpa@gmail.com

Begin forwarded message:

From: "DML" <dml@lovelacelaw.com>
Date: May 11, 2016 at 4:38:23 PM CDT
To: "'Don Barrett'" <donbarrettpa@gmail.com>, <'donbarrettpa@gmail.com'>, "'Marie Thomas'" <MThomas@barrettlawgroup.com>
Cc: "Sparky Lovelace" <dml@lovelacelaw.com>
Subject: Lovelace and Associates Expenses - Dec - Mar 2016

Please see attached, totaling $3,260.60.

Thanks,
Sandy L. Rosenthal
Legal Assistant
Lovelace and Associates, P.A.
12870 US Hwy 98 West
Suite 200
Miramar Beach, FL 32550
Phone: 850-837-6020
Fax: 850-837-4093



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

7032

DATE 6/6/2016

86-194/653

PAY TO THE ORDER OF Mantese, Honigman, PC $ **571.61

Five Hundred Seventy-One and 61/100********** DOLLARS

Mantese, Honigman, PC
1361 E. Big Beaver Rd
Troy, MI 48083

MEMO Wire Harness expenses - 1st quarter 2016

Marie Thomas

⑈7032⑈ ⑆065301948⑆ 60200266361⑈

Don Barrett, P.A. 7032

Mantese, Honigman, PC	6/6/2016	
215 · Trust Account Liability	Wire Harness expenses - 1st quarter 2016 - Ct Restri	571.61

BankPlus Trust/IOLTA Wire Harness expenses - 1st quarter 2016 571.61

Don Barrett, P.A. 7032

Mantese, Honigman, PC	6/6/2016	
215 · Trust Account Liability	Wire Harness expenses - 1st quarter 2016 - Ct Restri	571.61

BankPlus Trust/IOLTA Wire Harness expenses - 1st quarter 2016 571.61

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 12-1-15 **Quarter Ending** 3-31-16

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	
Train Fare	
Cabs	
Other Local Transportation	
Travel - Meals	
Travel - Miscellaneous	
Federal Express, Local Courier, etc.	423.01
Postage Charges	147.60
Facsimile Charges	
Long Distance	
In-House Photocopying	1.00
Outside Photocopying	
Court Fees (filing, etc.)	
Professional Fees	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
CURRENT TOTAL	$ 571.61

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.

Signed: [signature] Date: 5-17-16

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

7055

85-194 / 653

DATE 6/30/2016

PAY TO THE ORDER OF Cuneo, Gilbert & LaDunca LLP $ **46,986.56

Forty-Six Thousand Nine Hundred Eighty-Six and 56/100**********DOLLARS

Cuneo, Gilbert & LaDunca LLP
507 C Street, NE
Washington, DC 20002

MEMO Wire Harness - 1st quarter 2016 expenses

Marie Thomas

⑈7055⑈ ⑆065301948⑆ 60200266 36⑈

Don Barrett, P.A. 7055

Cuneo, Gilbert & LaDunca LLP		6/30/2016	
215 · Trust Account Liability	Wire Harness - 1st quarter 2016 expenses		46,986.56

OK

BankPlus Trust/IOLTA Wire Harness - 1st quarter 2016 expenses 46,986.56

Don Barrett, P.A. 7055

Cuneo, Gilbert & LaDunca LLP		6/30/2016	
215 · Trust Account Liability	Wire Harness - 1st quarter 2016 expenses		46,986.56

BankPlus Trust/IOLTA Wire Harness - 1st quarter 2016 expenses 46,986.56

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- [X] 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: Cuneo Gilbert & LaDuca, LLP

Quarter Beginning _Dec 1, 2015 Quarter Ending _Mar 31, 2016

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	$10,958.31
Train Fare	$2,637.00
Cabs	$4,533.12
Other Local Transportation	
Travel - Meals	$7,197.80
Travel - Miscellaneous	$12,769.57
Federal Express, Local Courier, etc.	$2,833.65
Postage Charges	
Facsimile Charges	
Long Distance	$1,829.38
In-House Photocopying	
Outside Photocopying	$255.24
Court Fees (filing, etc.)	$14.00
Professional Fees	
Witness/Service Fees	
Court Reporter/Transcripts	$210.60
Computer Research	$3,655.71
Miscellaneous Wifi	$92.18
CURRENT TOTAL	$46,986.56

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 L Gans
Signed:

6/28/16
Date:

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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

7157

85-194 / 653

DATE 9/29/2016

PAY TO THE ORDER OF Don Barrett P.A. $ **53,198.34

Fifty-Three Thousand One Hundred Ninety-Eight and 34/100********** DOLLARS

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

MEMO 2nd Quarter WH expenses

Marci Thomas

⑈7157⑈ ⑆065301948⑆ 60200266361⑈

Don Barrett, P.A.			7157
Don Barrett P.A.		9/29/2016	
215 · Trust Account Liability	2nd Quarter WH expenses		53,198.34
BankPlus Trust/IOLTA	2nd Quarter WH expenses		53,198.34
Don Barrett, P.A.			7157
Don Barrett P.A.		9/29/2016	
215 · Trust Account Liability	2nd Quarter WH expenses		53,198.34
BankPlus Trust/IOLTA	2nd Quarter WH expenses		53,198.34

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

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

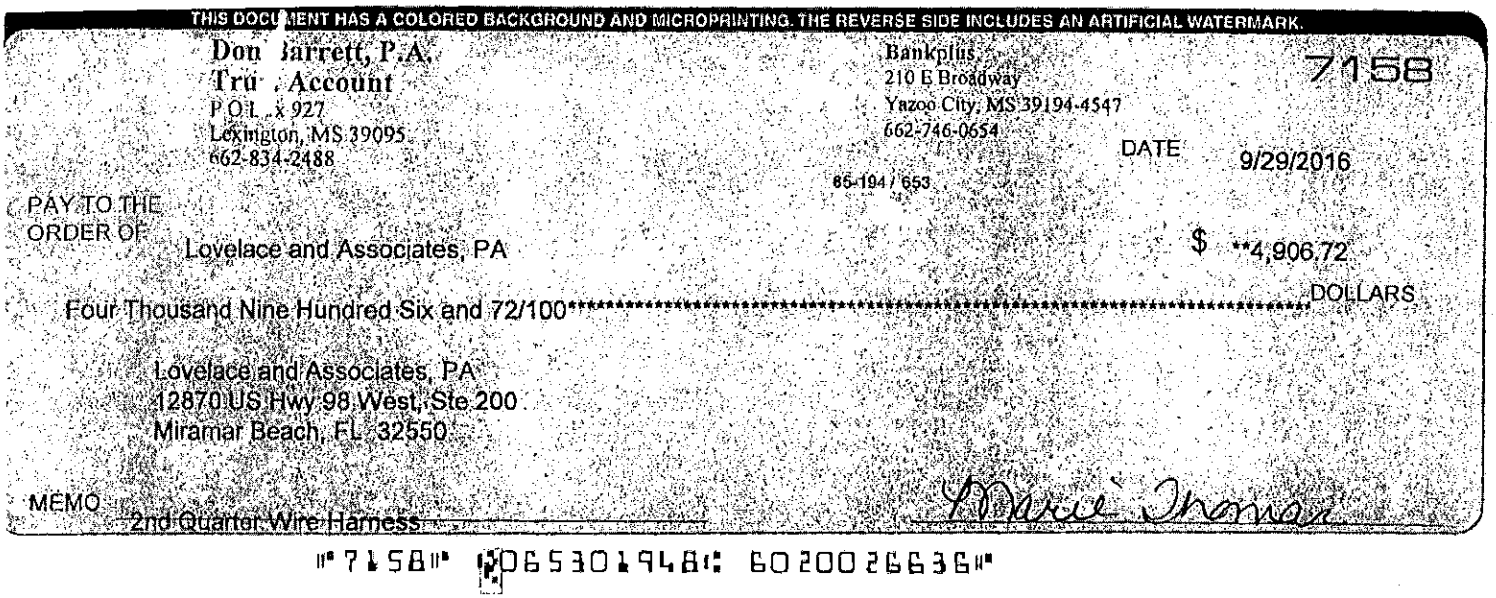
Firm Name: **Barrett Law Group, PA**

Quarter Beginning: Quarter Ending:

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation		$0.00
Airfare	$21,521.91	$50,151.59
Travel Lodging	$8,813.19	$8,813.19
Cabs		$12,264.23
Other Local Transportation		$0.00
Travel - Meals	$1,723.07	$8,610.47
Travel - Miscellaneous	$8,407.69	$27,941.45
Federal Express, Local Courier, etc.	$693.75	$852.42
Postage Charges	$2.20	$48.49
Long Distance	$129.08	$281.35
In-House Photocopying	$724.00	$724.00
Outside Photocopying		$0.00
Court Fees (filing, etc.)	$226.00	$226.00
Professional Fees		$0.00
Witness/Service Fees		$0.00
Court Reporter/Transcripts		$0.00
Computer Research	$7.98	$26.48
Miscellaneous :Contract Labor,	$10,949.47	$19,124.85
		$0.00
CURRENT TOTAL	$53,198.34	$129,064.52

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: 26-Jul-16



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

7158

DATE 9/29/2016

65-194 / 653

PAY TO THE ORDER OF Lovelace and Associates, PA

$ **4,906.72

Four Thousand Nine Hundred Six and 72/100********** DOLLARS

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

MEMO 2nd Quarter Wire Harness

Marie Thomas

⑈7158⑈ ⑆065301948⑆ 60200266 36⑈

Don Barrett, P.A. 7158

Lovelace and Associates, PA		9/29/2016	
215 · Trust Account Liability	2nd Quarter Wire Harness - Ct REst.		4,906.72

BankPlus Trust/IOLTA 2nd Quarter Wire Harness 4,906.72

Don Barrett, P.A. 7158

Lovelace and Associates, PA		9/29/2016	
215 · Trust Account Liability	2nd Quarter Wire Harness - Ct REst.		4,906.72

BankPlus Trust/IOLTA 2nd Quarter Wire Harness 4,906.72

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

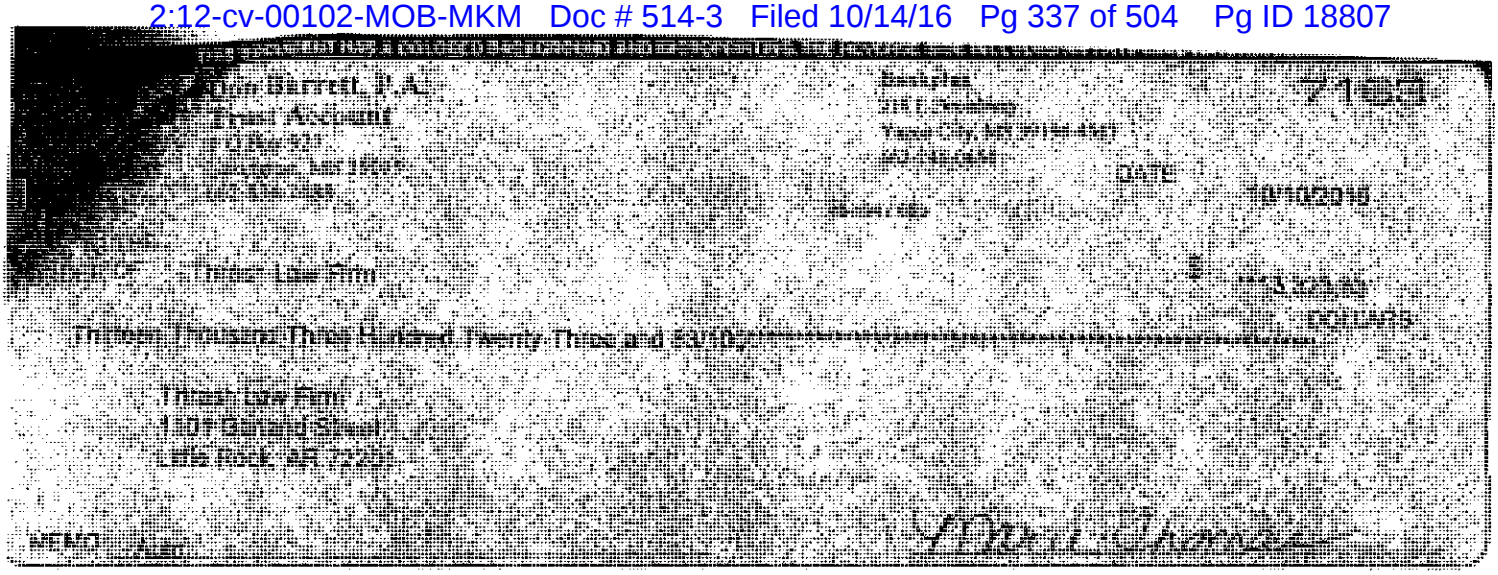
Firm Name: Lovelace and Associates, P.A.

Quarter Beginning April 2016 **Quarter Ending** June 2016

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$1,696.38
Train Fare	
Cabs	$56.74
Other Local Transportation	
Travel – Meals	
Travel – Hotel	$634.00
Federal Express, Local Courier, etc.	$71.67
Postage Charges	
Facsimile Charges	
Long Distance	$914.40
In-House Photocopying	$964.25
Outside Photocopying	
Court Fees (filing, etc.)	
Professional Fees (Document Review Temps)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	$569.28
Miscellaneous (Describe)	
CURRENT TOTAL	$4,906.72

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: _____



Don Barrett, P.A.			7163
Thrash Law Firm 215 · Trust Account Liability	Auto - 1st and 2nd quarter WH - Ct Rest	10/10/2016	13,323.83
BankPlus Trust/IOLTA Auto			13,323.83

Don Barrett, P.A.			7163
Thrash Law Firm 215 · Trust Account Liability	Auto - 1st and 2nd quarter WH - Ct Rest	10/10/2016	13,323.83
BankPlus Trust/IOLTA Auto			13,323.83

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: Thrash Law Firm, P.A.

Quarter Beginning 4/1/16 Quarter Ending 6/30/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$1,066.93
Train Fare	$10.00
Cabs	$245.16
Other Local Transportation	$119.87
Travel – Meals	$372.22
Travel – Miscellaneous	$2,255.59
Federal Express, Local Courier, etc.	$109.10
Postage Charges	$94.86
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$1,103.50
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$1.03
Miscellaneous (Describe) (Depo Supplies)	$24.06
CURRENT TOTAL	$5,402.32

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: 8/29/16

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

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

Firm Name: Thrash Law Firm, P.A.

Quarter Beginning 12/1/15 **Quarter Ending** 3/31/16

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	1,763.40
Train Fare	60.00
Cabs	324.28
Other Local Transportation	1,363.49
Travel - Meals	420.63
Travel - Miscellaneous	3,892.88
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	106.66
Outside Photocopying	
Court Fees (filing, etc.)	
Professional Fees	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	10.27
Miscellaneous (Describe)	
CURRENT TOTAL	$7,921.51

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: 6/1/2016

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

7164

DATE 10/10/2016

86-194 / 653

PAY TO THE ORDER OF Mantese, Honigman, PC

$ **1,695.43

One Thousand Six Hundred Ninety-Five and 43/100********** DOLLARS

Mantese, Honigman, PC
1361 E. Big Beaver Rd
Troy, MI 48083

MEMO auto

Marie Thomas

⑈7164⑈ ⑆065301948⑆ 60200266 36⑈

Don Barrett, P.A. 7164

Mantese, Honigman, PC		10/10/2016	
215 · Trust Account Liability	Auto - 2nd and 3rd quarter - Ct Rest		1,695.43

BankPlus Trust/IOLTA auto 1,695.43

Don Barrett, P.A. 7164

Mantese, Honigman, PC		10/10/2016	
215 · Trust Account Liability	Auto - 2nd and 3rd quarter - Ct Rest		1,695.43

BankPlus Trust/IOLTA auto 1,695.43

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

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

Firm Name: Mantese Honigman, PC

Quarter Beginning 4-1-16 Quarter Ending 9-30-16

DESCRIPTION	AMOUNT
Travel - Transportation	
Airfare	
Train Fare	
Cabs	
Other Local Transportation	
Travel - Meals	
Travel - Miscellaneous Mileage	57.20
Federal Express, Local Courier, etc.	103.73
Postage Charges	25.49
Facsimile Charges	
Long Distance	4.44
In-House Photocopying	140.10
Outside Photocopying	
Court Fees (filing, etc.)	800.00
Professional Fees	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	532.97
Miscellaneous (Describe) Parking	32.00
CURRENT TOTAL	$ 1695.43

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.

Signed: Brandon D. Ron

Date: 10-5-16

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

7169

85-134 / 653

DATE 9/23/2016

PAY TO THE ORDER OF Lovelace and Associates, PA

$ **8,316.21

Eight Thousand Three Hundred Sixteen and 21/100********** DOLLARS

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

MEMO Auto - 3rd Quarter

Marie Thomas

⑈7169⑈ ⑆065301948⑆ 60200266 36⑈

Don Barrett, P.A. 7169

Lovelace and Associates, PA		9/23/2016	
215 · Trust Account Liability	Auto - 3rd Quarter Ct REstricted		8,316.21

BankPlus Trust/IOLTA Auto - 3rd Quarter 8,316.21

Don Barrett, P.A. 7169

Lovelace and Associates, PA		9/23/2016	
215 · Trust Account Liability	Auto - 3rd Quarter Ct REstricted		8,316.21

BankPlus Trust/IOLTA Auto - 3rd Quarter 8,316.21

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

3rd Quarter

Firm Name: Lovelace and Associates, P.A.

Quarter Beginning July 2016 **Quarter Ending** September 2016

DESCRIPTION	AMOUNT
Travel – Transportation	356.58
Airfare	1,699.68
Train Fare	
Cabs	
Other Local Transportation	128.91
Travel – Meals	1,207.02
Travel – Hotel	4,368.19
Federal Express, Local Courier, etc.	127.53
Postage Charges	
Facsimile Charges	
Long Distance	175.80
In-House Photocopying	252.50
Outside Photocopying	
Court Fees (filing, etc.)	
Professional Fees (Document Review Temps)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
CURRENT TOTAL	**$8,316.21**

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.

DM
Signed:

9/30/16
Date:

OK to pay from Ct ordered fund

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- [x] 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: Cuneo Gilbert & LaDuca, LLP

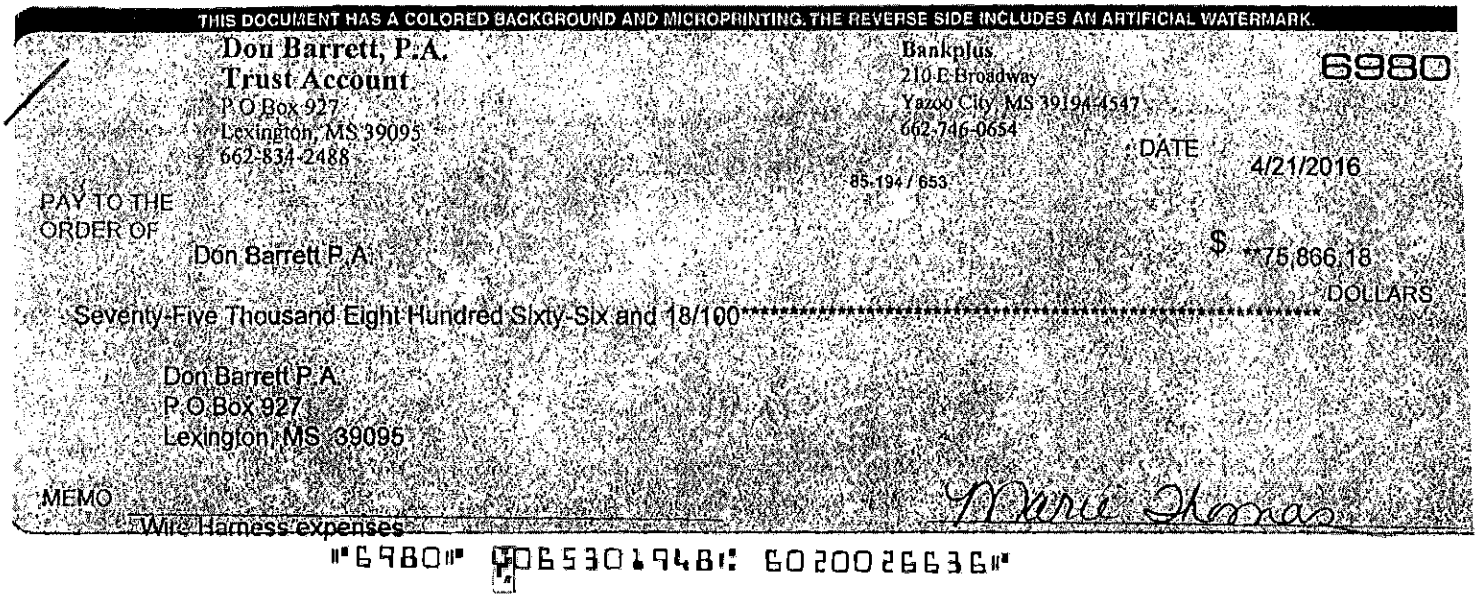
Quarter Beginning Apr 1, 2016 Quarter Ending Jun 30, 2016 Quarter Ending Sep 30, 2016 Total

DESCRIPTION	AMOUNT	AMOUNT	AMOUNT
Travel - Transportation			
Airfare	$8,210.69	$11,060.05	$19,270.94
Train Fare	$3,227.20	$1,509.50	$4,736.70
Cabs	$2,055.09	$2,840.80	$4,895.89
Other Local Transportation			
Travel - Meals	$4,240.30	$5,075.97	$9,316.27
Travel - Miscellaneous	$17,707.36	$8,285.54	$25,992.90
Federal Express, Local Courier, etc.	$959.80	$820.13	$1,779.93
Postage Charges			
Facsimile Charges			
Long Distance	$279.65	$266.82	$546.47
In-House Photocopying			
Outside Photocopying		$285.57	$285.57
Court Fees (filing, etc.)			
Professional Fees			
Witness/Service Fees			
Court Reporter/Transcripts	$198.85	$2,552.25	$2,751.10
Computer Research	$4,374.08	$3,745.14	$8,119.22
Miscellaneous Wifi			
		$45.99	$45.99
CURRENT TOTAL	$41,253.22	$36,487.76	$77,740.98

2nd, 3rd Quarter

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: 10/3/16 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

6980

DATE 4/21/2016

85-194 / 653

PAY TO THE ORDER OF Don Barrett P.A. $ **75,866.18

Seventy-Five Thousand Eight Hundred Sixty-Six and 18/100********** DOLLARS

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

MEMO Wire Harness expenses

Marie Thomas

⑈6980⑈ ⑆065301948⑆ 60200266366⑈

Don Barrett, P.A. 6980

Don Barrett P.A.	4/21/2016	
215 · Trust Account Liability	Wire Harness expenses - billed Jan, Feb and March	75,866.18

BankPlus Trust/IOLTA Wire Harness expenses 75,866.18

Don Barrett, P.A. 6980

Don Barrett P.A.	4/21/2016	
215 · Trust Account Liability	Wire Harness expenses - billed Jan, Feb and March	75,866.18

BankPlus Trust/IOLTA Wire Harness expenses 75,866.18

AUTOMOTIVE PARTS ANTITRUST LITIGATION - EXPENSES

- [x] 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
- [ ] Ignition Coils
- [ ] Electronic Throttle Bodies
- [ ] Switches
- [ ] Valve Timing Control Devices
- [ ] Starters
- [ ] ATF Warmers

Firm Name: Barrett Law Group, PA
Submited 5-20-16- To Sandy
Quarter Beginning: January 2016 Quarter Ending: March 2016

DESCRIPTION	CURRENT AMOUNT	CUMULATIVE AMOUNT
Travel - Transprotation		$0.00
Airfare	$28,629.68	$28,629.68
Train Fare		$0.00
Cabs	$12,264.23	$12,264.23
Other Local Transportation		$0.00
Travel - Meals	$6,887.40	$6,887.40
Travel - Miscellaneous	$19,533.76	$19,533.76
Federal Express, Local Courier, etc.	$158.67	$158.67
Postage Charges	$46.29	$46.29
Long Distance	$152.27	$152.27
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	$18.50	$18.50
Miscellaneous-doc review/Travel	$8,175.38	$8,175.38
Contract Labor		$0.00
CURRENT TOTAL	**$75,866.18**	$75,866.18

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:

5-20-16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
X	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception Quarter Ending 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$30.22
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$13.30
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$679.61
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	$ 723.13

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

$130,823.58

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	X	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$150.00
Train Fare	$0.00
Cabs	$72.12
Other Local Transportation	$0.00
Travel – Meals	$35.26
Travel – Miscellaneous	$566.05
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$89.20
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$419.30
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$1,331.93**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
X	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$22,308.23
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$170.04
Postage Charges	$24.48
Facsimile Charges	$0.00
Long Distance	$22.42
In-House Photocopying	$88.20
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$621.87
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$23,235.24**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

X	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
X	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
X	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Kane

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
X	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	*$0.00*
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
X	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Signed: Shawn M. Raiter

Date: 10/10/16

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	X	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception Quarter Ending 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	$ 0.00

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.

Shawn M. Kain

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	X	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	X	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Kane

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	X	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	*$0.00*
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
X	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception Quarter Ending 8/31/16

DESCRIPTION	AMOUNT
Travel -- Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel -- Meals	$0.00
Travel -- Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	*$0.00*
CURRENT TOTAL	$ 0.00

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
X	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Signed: Shawn M. Raiter

Date: 10/10/16

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	X	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Kann

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	X	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	X	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Kane

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	X	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	*$0.00*
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — 10/10/16

Signed: Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	X	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Kain — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	X	Windshield Wiper Systems
		☐	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning Inception **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Kane — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

☐	Air Conditioning Systems	☐	Fan Motors
☐	Anti-Vibration Rubber Parts	☐	Heater Control Panels
☐	Automotive Hoses	☐	Power Window Motors
☐	Bearings	☐	Power Window Switches
☐	Ceramic Substrates	☐	Spark Plugs
☐	Electronic Powered Steering Assemblies	☐	Window Washer Systems
☐	General Matters	☐	Windshield Wiper Systems
		X	Wire Harness

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$4,165.00
Train Fare	$0.00
Cabs	$267.05
Other Local Transportation	$29.88
Travel – Meals	$752.01
Travel – Miscellaneous	$2,305.94
Federal Express, Local Courier, etc.	$179.64
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$285.19
In-House Photocopying	$57.20
Outside Photocopying	$6.95
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$93,128.95
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$3769.05
Miscellaneous (USB drives for document production)	$586.42
CURRENT TOTAL	**$105,533.28**

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.

Shawn M. Raiter — 10/10/16

Signed: Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 5/31/2016

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$0.00
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$0.00
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/2016

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous (Hotel)	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous (hotel/airport parking)	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.*

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 Quarter Ending 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Signed: _____ Date: 10/10/16

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel -- Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel -- Meals	$0.00
Travel -- Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn H. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — 10/10/16

Signed: Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	*$0.00*
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — Signed:

10/10/16 — 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

7035

65-194 / 653

DATE 6/8/2016

PAY TO THE ORDER OF Larson King, LLP

$ **60,977.70

Sixty Thousand Nine Hundred Seventy-Seven and 70/100********** DOLLARS

Larson King, LLP
3 East Seventh St. Suite 2800
St Paul, MN 55101

MEMO Auto Wire expenses 1st quarter 2016

Marie Thomas

⑈7035⑈ ⑆065301948⑆ 60200266 36⑈

Don Barrett, P.A.			7035
Larson King, LLP 215 · Trust Account Liability	Auto Wire expenses 1st quarter 2016	6/8/2016	60,977.70

Pd Rest

BankPlus Trust/IOLTA Auto Wire expenses 1st quarter 2016 60,977.70

Don Barrett, P.A.			7035
Larson King, LLP 215 · Trust Account Liability	Auto Wire expenses 1st quarter 2016	6/8/2016	60,977.70

BankPlus Trust/IOLTA Auto Wire expenses 1st quarter 2016 60,977.70

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 12/1/15 **Quarter Ending** 3/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	
Airfare	$2,076.40
Train Fare	$0.00
Cabs	$375.07
Other Local Transportation	$0.00
Travel – Meals	$27.93
Travel – Miscellaneous	$324.35
Federal Express, Local Courier, etc.	$97.93
Postage Charges	$14.59
Facsimile Charges	$0.00
Long Distance	$42.80
In-House Photocopying	$139.40
Outside Photocopying	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (Document Review Temps)	$54,075.64
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$3,803.59
Miscellaneous (Describe)	$0.00
CURRENT TOTAL	**$60,977.70**

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: 6/1/16

AUTOMOTIVE PARTS ANTITRUST LITIGATION -- EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.*

Shawn M. Raiter — Signed:

10/10/16 — Date:

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	*$0.00*
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter — 10/10/16

Signed: *Date:*

AUTOMOTIVE PARTS ANTITRUST LITIGATION – EXPENSES

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

Firm Name: Larson King LLP

Quarter Beginning 9/16/2015 **Quarter Ending** 8/31/16

DESCRIPTION	AMOUNT
Travel – Transportation	$0.00
Airfare	$0.00
Train Fare	$0.00
Cabs	$0.00
Other Local Transportation	$0.00
Travel – Meals	$0.00
Travel – Miscellaneous	$0.00
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile 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)	$0.00
CURRENT TOTAL	**$ 0.00**

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.

Shawn M. Raiter

Signed:

10/10/16

Date:

Marie Thomas re Fees Motion

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):	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	:	Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to:	:	Hon. Marianne O. Battani
ALL DEALERSHIP ACTIONS	:	

AFFIDAVIT OF MARIE THOMAS IN SUPPORT OF AUTOMOBILE DEALERS INTERIM CO-LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES

I, Marie Thomas, declare as follows:

1. I am the Accounting Manager for Barrett Law Group, P.A. I submit this Affidavit 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 above styled and numbered cases (the "Actions").

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

3. To date a total of $1,310,663.70 has been collected for this litigation fund. Of that amount, a total of $500,046.88 has been spent by the litigation fund for common expenses in connections with the Actions, and not reimbursed. 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. I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed this 12 day of October, 2016.

Marie Thomas

Marie Thomas
BARRETT LAW GROUP, PA
404 Court Square North
Lexington, MS 39095
Office 662.834.2488
mthomas@barrettlawgroup.com

STATE OF MISSISSIPPI;
COUNTY OF HOLMES;

SUBSCRIBED AND SWORN TO BEFORE ME ON 12TH DAY OF OCTOBER, 2016.

Catherine Barnes

NOTARY PUBLIC, State of MS
My Commission expires: Aug. 3, 2020

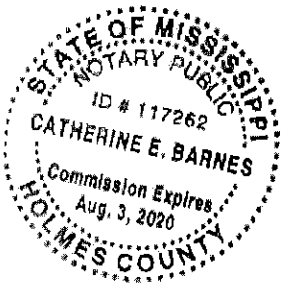


EXHIBIT A

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

FIRM NAME: BARRETT LAW GROUP, PA

REPORTING PERIOD: SEPTEMBER 16, 2015 THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Arbitrators/Mediators	$55,220.83
Postage Charges	$9.45
Facsimile Charges	
Translator	$31,453.20
In-House Photocopying	
Litigation Support Vendor	$186,818.24
Travel (Transporation, lodging, meals, etc.)	$4,819.16
Plaintiff Expense Fund	$50,000.00
Professional Fees (expert/investigators, etc.)	$142,472.61
Witness/Service Fees	
Temporary Professionals/scanning documents	$29,147.39
Document/Database Hosting	106.00
Miscellaneous (Describe)	
TOTAL	$500,046.88

Pierce Gore

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):	:	Case No. 12-cv-00102
	:	Case No. 12-cv-00202
	:	Case No. 12-cv-00302
WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	:	Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	:	Hon. Marianne O. Battani

DECLARATION OF PIERCE GORE CONCERNING TIME AND EXPENSES INCURRED BY PRATT AND ASSOCIATES, PA

I, Pierce Gore, declare as follows:

1. I am a partner at the law firm of Pratt and Associates, P.A. I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Pratt and Associates, P.A. in similar complex class action matters and are similar to rates approved for our work by other courts.

5. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 413.7 hours. The total lodestar for my firm for this period using current hourly billing rates is $151,645.00.

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

Executed this the 12th day of October, 2016 in San Jose, California.

Pierce Gore

PIERCE GORE

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: PRATT AND ASSOCIATES, PA

REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
PIERCE GORE	Owner/ Partner	413.7	$850.00	$351,645.00
	Associate			
	Paralegal			
TOTALS		413.7		$351,645.00

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **PRATT AND ASSOCIATES, PA**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
PIERCE GORE	P	$850.00	382.3	$324,955.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**382.3**	**$324,955.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **PRATT AND ASSOCIATES, PA**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
PIERCE GORE	P	$850.00	31.4	$26,690.00
	A	$0.00	0.00	$
	PL	$0.00	0.00	$
		$		$
		$		$
		$		$
TOTALS			**31.4**	**$26,690.00**

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

Shawn 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 Honorable Marianne O. Battani
	:	
In Re: Wire Harness	:	Case No. 2:12-cv-00102
In Re: Instrument Panel Clusters	:	Case No. 2:12-cv-00202
In Re: Fuel Senders	:	Case No. 2:12-cv-00302
In Re: Heater Control Panels	:	Case No. 2:12-cv-00402
In Re: Bearings	:	Case No. 2:12-cv-00502
In Re: Alternators	:	Case No. 2:13-cv-00702
In Re: Anti Vibrational Rubber Parts	:	Case No. 2:13-cv-00803
In Re: Windshield Wiper Systems	:	Case No. 2:13-cv-00902
In Re: Radiators	:	Case No. 2:13-cv-01002
In Re: Starters	:	Case No. 2:13-cv-01102
In Re: Ignition Coils	:	Case No. 2:13-cv-01402
In Re: Motor Generators	:	Case No. 2:13-cv-01502
In Re: HID Ballasts	:	Case No. 2:13-cv-01702
In Re: Inverters		Case No. 2:13-cv-01802
In Re: Electronic Powered Steering Assemblies		Case No. 2:13-cv-01902
In Re: Air Flow Meters		Case No. 2:13-cv-02002
In Re: Fan Motors		Case No. 2:13-cv-02102
In Re: Fuel Injection Systems		Case No. 2:13-cv-02202
In Re: Power Window Motors		Case No. 2:13-cv-02302
In Re: Automatic Transmission Fluid Warmers		Case No. 2:13-cv-02402
In Re: Valve Timing Control Devices		Case No. 2:13-cv-02502
In Re: Electronic Throttle Bodies		Case No. 2:13-cv-02602
In Re: Air Conditioning Systems		Case No. 2:13-cv-02702
In Re: Windshield Washer Systems		Case No. 2:13-cv-02802
In Re: Spark Plugs		Case No. 2:15-cv-03002
In Re: Automotive Hoses		Case No. 2:15-cv-12893
In Re: Power Window Switches		Case No. 2:16-cv-03902
In Re: Ceramic Substrates		Case No. 2:16-cv-12194

THIS DOCUMENT RELATES TO
AUTOMOBILE DEALERSHIP ACTIONS

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

I, Shawn M. Raiter, declare as follows:

1. I am a partner at the law firm of Larson King, LLP and am currenly Interim Co-Lead Class Counsel for the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs"). I submit this declaration in support of Interim Co-Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities:

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

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

through August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents work assigned by Interim Co-Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Co-Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Larson King, LLP in similar complex class action matters and are similar to rates approved for our work by other courts.

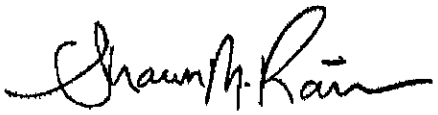
5. My firm has expended a total of $2,055.06 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actionsand have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 15,425.62 hours. The total lodestar for my firm for this period using current hourly billing rates is $6,074,926.00.

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

Executed this the 11th day of October, 2016 in St. Paul, Minnesota.



SHAWN M. RAITER

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

Firm Name: LARSON KING, LLP
Reporting Period: Inception-August 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Shawn M. Raiter	P	3872.90	$705.00	$2,730,394.50
T. Joseph Snodgrass	P	29.70	$705.00	$20,938.50
Kelly A. Lelo	P	304.00	$425.00	$129,200.00
Melissa M. Mulloy	P	56.50	$425.00	$24,012.50
Paul A. Sand	A	1417.00	$325.00	$460,525.00
Cassandra F. Fortin	A	37.80	$325.00	$12,285.00
Renee I. Fossen	A	2028.60	$325.00	$659,295.00
Hilary J. Palazzolo	A	194.20	$325.00	$63,115.00
Jennifer L. Young	A	116.90	$325.00	$37,992.50
David P. McKinney	A	41.00	$325.00	$13,325.00
Bradley R. Prowant	A	30.90	$325.00	$10,042.50
Paul Shapiro	A	307.60	$325.00	$99,970.00
Andrew M. Hart	A	1139.00	$325.00	$370,175.00
Stephanie L. Chandler	A	31.10	$325.00	$10,107.50
Michael K. Carlson	A	1171.92	$325.00	$380,874.00
Cindy L. Lambing	A	421.00	$325.00	$136,825.00
Andrea B. Mosher	A	37.00	$325.00	$12,025.00
Alyssa G. Smith	A	196.1	$325.00	$63,732.50
Heather M. Follensbee	A	51.00	$325.00	$16,575.00
Jan R. Jeske	A	47.20	$325.00	$15,340.00
Gregg J. Cavanagh	A	56.90	$325.00	$18,492.50
Marcia A. Miller	A	71.00	$325.00	$23,075.00
Elizabeth K. Elling	A	791.70	$325.00	$257,302.50
Kimberly J. King	A	59.60	$325.00	$19,370.00
Mary E. Relhsen	A	166.1	$325.00	$53,982.50
Gretchen A. Touchette	PL	861.40	$180.00	$155,052.00
Diane M. Schreifels	PL	140.40	$180.00	$25,272.00
Louise Bautch-Holton	PL	8.20	$175.00	$1,435.00
Anne Rodriguez	PL	158.00	$150.00	$23,700.00
Bjorn Hedstrom	PL	131.50	$150.00	$19,725.00
John Sievers	PL	382.20	$150.00	$57,330.00
Lauren M. Yates	PL	220.10	$150.00	$33,015.00
Wendy J. Welsh	PL	32.00	$150.00	$4,800.00

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Michael Mobley	PL	24.00	$150.00	$3,600.00
Darya O. Lucas	PL	24.00	$150.00	$3,600.00
Michelle T. Foster	PL	11.00	$150.00	$1,650.00
Rachel I. Farhi	PL	52.40	$150.00	$7,860.00
Heidi J. Rude	PL	72.00	$150.00	$10,800.00
Niquaise Y. Moore	PL	57.40	$150.00	$8,610.00
Lee A. Miller	PL	53.5	$150.00	$8,025.00
Latonya S. Irvin	PL	46.50	$150.00	$6,975.00
Tanya M. Baker	PL	58.60	$150.00	$8,790.00
Jay C. Clifton	PL	15.50	$150.00	$2,325.00
Sarah C. Rogers	PL	57.00	$150.00	$8,550.00
Lauren E. Pearson	PL	41.10	$150.00	$6,165.00
Linda J. Bell	PL	40.50	$150.00	$6,075.00
Ian D. Wright	PL	211.30	$140.00	$29,582.00
Laurie C. Burks	LAA	50.30	$60.00	$3,018.00
TOTALS		**15,425.62**		**$6,074,926.00**

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

*Lodestar calculated based on current hourly rates.

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **General Matters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	1611.00	$1,135,755.00
T. Joseph Snodgrass	P	$705.00	1.00	$705.00
Kelly A. Lelo	A	$425.00	1.00	$425.00
Paul A. Sand	A	$325.00	213.80	$69,485.00
Bradley R. Prowant	A	$325.00	30.90	$10,042.50
Paul M. Shapiro	A	$325.00	44.10	$14,332.50
Louise Bautch-Holton	PL	$175.00	1.10	$192.50
TOTALS			**1,902.90**	**$1,230,937.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Wire Harness**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	2118.70	$1,493,683.50
T. Joseph Snodgrass	P	$705.00	27.60	$19,458.00
Kelly A. Lelo	P	$425.00	148.20	$62,985.00
Melissa M. Mulloy	P	$425.00	56.50	$24,012.50
Paul A. Sand	A	$325.00	797.20	$259,090.00
Cassandra F. Fortin	A	$325.00	37.80	$12,285.00
Renee I. Fossen	A	$325.00	2028.60	$659,295.00
Hilary J. Palazzolo	A	$325.00	194.20	$63,115.00
Jennifer L. Young	A	$325.00	116.90	$37,992.50
David P. McKinney	A	$325.00	41.00	$13,325.00
Andrew M. Hart	A	$325.00	1130.90	$367,542.50
Stephanie L. Chandler	A	$325.00	31.10	$10,107.50
Michael K. Carlson	A	$325.00	1171.92	$380,874.00
Cindy L. Lambing	A	$325.00	421.00	$136,825.00
Andrea B. Mosher	A	$325.00	37.00	$12,025.00
Alyssa G. Smith	A	$325.00	196.1	$63,732.50

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Heather M. Follensbee	A	$325.00	51.00	$16,575.00
Jan R. Jeske	A	$325.00	47.20	$15,340.00
Gregg J. Cavanagh	A	$325.00	56.90	$18,492.50
Marcia A. Miller	A	$325.00	71.00	$23,075.00
Elizabeth K. Elling	A	$325.00	791.70	$257,302.50
Kimberly J. King	A	$325.00	59.60	$19,370.00
Mary E. Relhsen	A	$325.00	166.1	$53,982.50
Gretchen A. Touchette	PL	$180.00	861.40	$155,052.00
Diane M. Schreifels	PL	$180.00	140.40	$25,272.00
Louise Bautch-Holton	PL	$175.00	1.40	$245.00
Anne Rodriguez	PL	$150.00	158.00	$23,700.00
Bjorn Hedstrom	PL	$150.00	131.50	$19,725.00
John Sievers	PL	$150.00	382.20	$57,330.00
Lauren M. Yates	PL	$150.00	220.10	$33,015.00
Wendy J. Welsh	PL	$150.00	32.00	$4,800.00
Michael Mobley	PL	$150.00	24.00	$3,600.00
Darya O. Lucas	PL	$150.00	24.00	$3,600.00
Michelle T. Foster	PL	$150.00	11.00	$1,650.00
Rachel I. Farhi	PL	$150.00	52.40	$7,860.00
Heidi J. Rude	PL	$150.00	72.00	$10,800.00
Niquaise Y. Moore	PL	$150.00	57.40	$8,610.00
Lee A. Miller	PL	$150.00	53.5	$8,025.00

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Latonya S. Irvin	PL	$150.00	46.50	$6,975.00
Tanya M. Baker	PL	$150.00	58.60	$8,790.00
Jay C. Clifton	PL	$150.00	15.50	$2,325.00
Sarah C. Rogers	PL	$150.00	57.00	$8,550.00
Lauren E. Pearson	PL	$150.00	41.10	$6,165.00
Linda J. Bell	PL	$150.00	40.50	$6,075.00
Ian D. Wright	PL	$140.00	211.30	$29,582.00
Laurie C. Burks	LAA	$60.00	50.30	$3,018.00
TOTALS			**12,540.32**	**$4,455,249.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Instrument Panel Clusters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	30.80	$21,714.00
T. Joseph Snodgrass	P	$705.00	0.80	$564.00
Kelly A. Lelo	P	$425.00	154.80	$65,790.00
Paul A. Sand	A	$325.00	256.80	$83,460.00
Paul M. Shapiro	A	$325.00	263.50	$85,637.50
Louise Bautch-Holton	PL	$175.00	1.00	$175.00
TOTALS			707.70	$257,340.50

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Fuel Senders**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	3.80	$2,679.00
Paul A. Sand	A	$325.00	53.70	$17,452.50
Louise Bautch-Holton	PL	$175.00	0.70	$122.50
TOTALS			**58.20**	**$20,254.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Heater Control Panels**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	56.60	$39,903.00
T. Joseph Snodgrass	P	$705.00	0.30	$211.50
Paul A. Sand	A	$325.00	46.70	$15,177.50
Louise Bautch-Holton	PL	$175.00	0.80	$140.00
TOTALS			**104.40**	**$55,432.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Bearings**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	26.60	$18,753.00
Paul A. Sand	A	$325.00	17.60	$5,720.00
TOTALS			**44.20**	**$24,473.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Alternators**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paul A. Sand	A	$325.00	10.70	$3,477.50
Louise Bautch-Holton	PL	$175.00	0.60	$105.00
TOTALS			**11.30**	**$3,582.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Anti-Vibration Rubber Parts**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	17.20	$12,126.00
Paul A. Sand	A	$325.00	14.90	$4,842.50
Louise Bautch-Holton	PL	$175.00	0.60	$105.00
TOTALS			**32.70**	**$17,073.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Windshield Wipers**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paul A. Sand	A	$325.00	0.50	$162.50
Louise Bautch-Holton	PL	$175.00	0.80	$140.00
TOTALS			**1.30**	**$ 302.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Radiators**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Paul A. Sand	A	$325.00	0.70	$227.50
Andrew M. Hart	A	$325.00	5.30	$1,722.50
Louise Bautch-Holton	PL	$175.00	0.60	$105.00
TOTALS			**6.60**	**$2,055.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Starters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	1.50	$1,057.50
Paul A. Sand	A	$325.00	4.40	$1,430.00
Louise Bautch-Holton	PL	$175.00	0.60	$105.00
TOTALS			**6.50**	**$2,592.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Ignition Coils**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.60	$423.00
TOTALS			**0.60**	**$423.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Motor Generators**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **HID Ballasts**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Inverters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Electronic Powered Steering Assemblies**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Air Flow Meters**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Fan Motors**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.50	$352.50
TOTALS			**0.50**	**$352.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Fuel Injection Systems**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Power Window Motors**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Automatic Transmission Fluid Warmers**
Reporting Period: **Inception – August 31, 2016**

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

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Valve Timing Control Devices**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	4.50	$3,172.50
TOTALS			4.50	**$3,172.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Electronic Throttle Bodies**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Air Conditioning Systems**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.60	$423.00
TOTALS			**0.60**	**$423.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Windshield Washer Systems**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.50	$352.50
TOTALS			**0.50**	**$352.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Spark Plugs**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Automotive Hoses**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Power Window Switches**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **Larson • King, LLP**
Case: **Ceramic Substrates**
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	$705.00	0.00	$0.00
TOTALS			**0.00**	**$0.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$30.22
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$13.30
Outside Photocopying	$0.00
Travel (Transportation, lodging, meals, etc.)	$0.00
Court Fees (filing, etc.)	$0.00
Professional Fees (expert/investigators, etc.)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$679.61
Miscellaneous (Describe)	$0.00
TOTAL	**$ 723.13**

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson • King, LLP**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$0.00
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$89.20
Outside Photocopying	$0.00
Travel (Transportation, lodging, meals, etc.)	$823.43
Court Fees (filing, etc.)	$0.00
Professional Fees (expert/investigators, etc.)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$419.30
Miscellaneous (Describe)	$0.00
TOTAL	**$1,331.93**

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION

Firm Name: LARSON KING, LLP
Reporting Period: Inception-August 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$30.22
Postage Charges	$0.00
Facsimile Charges	$0.00
Long Distance	$0.00
In-House Photocopying	$102.50
Outside Photocopying	$0.00
Travel (Transportation, lodging, meals, etc.)	$823.43
Court Fees (filing, etc.)	$0.00
Professional Fees (expert/investigators, etc.)	$0.00
Witness/Service Fees	$0.00
Court Reporter/Transcripts	$0.00
Computer Research	$1,098.91
Miscellaneous (Describe)	$0.00
TOTAL	**$2,055.06**

Tom Thrash

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): WIRE HARNESS; INSTRUMENT PANEL CLUSTERS; FUEL SENDERS; HEATER CONTROL PANELS; BEARINGS; ALTERNATORS; ANTI-VIBRATIONAL RUBBER PARTS; WINDSHIELD WIPER SYSTEMS; RADIATORS; STARTERS; IGNITION COILS; MOTOR GENERATORS; HID BALLASTS; INVERTERS; ELECTRONIC POWERED STEERING ASSEMBLIES; AIR FLOW METERS; FAN MOTORS; FUEL INJECTION SYSTEMS; POWER WINDOW MOTORS; AUTOMATIC TRANSMISSION FLUID WARMERS; VALVE TIMING CONTROL DEVICES; ELECTRONIC THROTTLE BODIES; AIR CONDITIONING SYSTEMS; WINDSHIELD WASHER SYSTEMS; SPARK PLUGS; AUTOMOTIVE HOSES; POWER WINDOW SWITCHES; AND CERAMIC SUBSTRATES	Case No. 12-cv-00102 Case No. 12-cv-00202 Case No. 12-cv-00302 Case No. 12-cv-00402 Case No. 12-cv-00502 Case No. 13-cv-00702 Case No. 13-cv-00802 Case No. 13-cv-00902 Case No. 13-cv-01002 Case No. 13-cv-01102 Case No. 13-cv-01402 Case No. 13-cv-01502 Case No. 13-cv-01702 Case No. 13-cv-01802 Case No. 13-cv-01902 Case No. 13-cv-02002 Case No. 13-cv-02102 Case No. 13-cv-02202 Case No. 13-cv-02302 Case No. 13-cv-02402 Case No. 13-cv-02502 Case No. 13-cv-02602 Case No. 13-cv-02702 Case No. 13-cv-02802 Case No. 15-cv-03002 Case No. 15-cv-12893 Case No. 16-cv-03902 Case No. 16-cv-12194
This Document Relates to: ALL DEALERSHIP ACTIONS	Hon. Marianne O. Battani

DECLARATION OF THOMAS P. THRASH CONCERNING TIME AND EXPENSES INCURRED BY THOMAS P. THRASH

I, **THOMAS P. THRASH**, declare as follows:

1. I am a partner at the law firm of Thrash Law Firm, P.A. I submit this declaration in support of Interim Lead Class Counsel for the Auto Dealers' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the cases listed above in this Autoparts Antitrust Litigation ("the Actions").

2. My firm has represented the Indirect Purchaser Automobile Dealer Plaintiffs ("Dealership Plaintiffs") in the Actions on a contingent basis. During this time, my firm has been involved in various aspects of the following activities and anticipates being involved in future activities, under the direction of Interim Lead Class Counsel:

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

3. Attached to this Declaration as Exhibit 1 is a summary of the time spent by my firm's attorneys and professional staff who have been involved in these Actions, and the lodestar calculation based on my firm's current billing rates, from the inception of the cases through August 31, 2016. The summary was prepared at my request from contemporaneous, daily time records regularly prepared and maintained by my firm.

4. The lodestar amount listed in Exhibit 1 represents for work assigned by Interim Lead Class Counsel, and was performed by attorneys and professional staff at my firm for the benefit of the Dealership Plaintiffs who are settlement class members in the Actions. As required by the Court and Interim Lead Class Counsel, my firm worked hard to be efficient and to avoid duplication of time and effort in this litigation. The lodestar listed in Exhibit 1 does not include time spent on any case in this MDL litigation that involves a part for which a settlement has not been reached. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates charged by Thrash Law Firm, P.A in similar complex class action matters and are similar to rates approved for our work by other courts.

5. My firm has expended a total of $11,983.18 in unreimbursed costs and expenses in connection with the prosecution of the Actions from the inception of the litigation through August 31, 2016. My firm advanced these costs with no guarantee that the costs would be repaid. My firm undertook this risk to benefit the Dealership Plaintiffs who are settlement class members in the Actions. The costs and expenses set forth in the schedule attached to this declaration as Exhibit 2 are reflected on the books and records of my firm. They were incurred by my firm on behalf of Dealership Plaintiffs in the Actionsand have not been reimbursed.

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

7. The total number of hours my firm has spent representing Dealership Plaintiffs in the Actions from inception through August 31, 2016 is 3,472.80 hours. The total lodestar for my firm for this period using current hourly billing rates is $2,140,772.50

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

Executed this the 7th day of October, 2016 in Little Rock, Arkansas.

/s/ Thomas P. Thrash
THOMAS P. THRASH

EXHIBIT 1

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION TIME REPORT

FIRM NAME: Thrash Law Firm, P.A.
REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

PROFESSIONAL	STATUS	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR*
Thomas P. Thrash	Owner/ Partner	1477.95	$800.00	$1,182,360.00
Marcus N. Bozeman	Associate	940.40	$650.00	$611,260.00
James Hollensworth	Associate	495.50	$475.00	$235,362.50
Cydni Arterbury	Paralegal	558.95	$200.00	$111,790.00
TOTALS		3472.80		$2,140,772.50

P = Partner
C = Counsel
A = Associate
PL = Paralegal

*Lodestar calculated based on current hourly rates.

EXHIBIT 2

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION
FIRM NAME: Thrash Law Firm, P.A.
REPORTING PERIOD: INCEPTION THROUGH AUGUST 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$24.06
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	$116.60
Outside Photocopying	
Travel (Transporation, lodging, meals, etc.)	$10,970.70
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	$871.82
TOTAL	$11,983.18

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Air Conditioning Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.30	$1,040.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.50	$100.00
		$		$
		$		$
		$		$
TOTALS			**1.80**	**$1,140.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Air Conditioning Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Air Flow Meters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.70	$1,360.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**2.40**	**$1,500.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: THRASH LAW FIRM, P.A.
Case: Air Flow Meters
Reporting Period: Inception to August 31, 2016

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Alternators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.90	$1,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			2.60	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Alternators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.40	$1,120.00
Marcus N. Bozeman	A	$650.00	0.50	$325.00
Cydni B. Arterbury	PL	$200.00	0.50	$100.00
		$		$
		$		$
		$		$
TOTALS			**2.40**	**$1,545.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Anti-Vibrational Rubber Parts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Automatic Transmission Fluid Warmers
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.40	$1,120.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**2.10**	**$1,260.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Automatic Transmission Fluid Warmers
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Automotive Hoses
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	0.30	$240.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.20	$40.00
		$		$
		$		$
		$		$
TOTALS			**0.50**	**$280.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Automotive Hoses
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Bearings
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	53.85	$43,080.00
Marcus N. Bozeman	A	$650.00	211.25	$137,312.50
James Hollensworth	A	$475.00	495.50	$235,362.50
Cydni B. Arterbury	PL	$200.00	18.50	$3,700.00
		$		$
		$		$
		$		$
TOTALS			779.10	$419,455.00

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Bearings
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	$24.06
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	$85.40
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	$10,970.70
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	$11,080.16

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Ceramic Substrates
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	0.80	$640.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Atterbury	PL	$200.00	0.30	$60.00
		$		$
		$		$
		$		$
TOTALS			**1.10**	**$700.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: THRASH LAW FIRM, P.A.
Case: Ceramic Substrates
Reporting Period: Inception to August 31, 2016

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	2.10	$1,680.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.80	$160.00
		$		$
		$		$
		$		$
TOTALS			**2.90**	**$1,840.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Electronic Powered Steering Assemblies
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Electronic Throttle Bodies
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	0.80	$640.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.30	$60.00
		$		$
		$		$
		$		$
TOTALS			**1.10**	**$700.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Electronic Throttle Bodies
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Fan Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.60	$1,280.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.60	$120.00
		$		$
		$		$
		$		$
TOTALS			2.20	**$1,400.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Fan Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Fuel Injection Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.90	$1,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**2.60**	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Fuel Injection Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Fuel Senders
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	6.70	$5,360.00
Marcus N. Bozeman	A	$650.00	17.25	$11,212.50
Cydni B. Arterbury	PL	$200.00	2.30	$460.00
		$		$
		$		$
		$		$
TOTALS			**26.25**	**$17,032.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Fuel Senders
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Auto Parts General
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	408.35	$326,680.00
Marcus N. Bozeman	A	$650.00	61.45	$39,942.50
Cydni B. Arterbury	PL	$200.00	220.15	$44,030.00
		$		$
		$		$
		$		$
TOTALS			**689.95**	**$410,652.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: THRASH LAW FIRM, P.A.
Case: General
Reporting Period: Inception to August 31, 2016

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	$871.82
TOTAL	$871.82

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Heater Control Panels
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	11.10	$8,880.00
Marcus N. Bozeman	A	$650.00	32.45	$21,092.50
Cydni B. Arterbury	PL	$200.00	4.10	$820.00
		$		$
		$		$
		$		$
TOTALS			**47.65**	**$30,792.50**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Heater Control Panels
Reporting Period: **Inception to August 31, 2016**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	$31.20
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court Fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	$31.20

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: HID Ballasts
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	2.90	$2,320.00
Marcus N. Bozeman	A	$650.00	6.50	$4,225.00
Cydni B. Arterbury	PL	$200.00	0.30	$60.00
		$		$
		$		$
		$		$
TOTALS			**9.70**	**$6,605.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: HID Ballasts
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Ignition Coils
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	4.40	$3,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	1.55	$310.00
		$		$
		$		$
		$		$
TOTALS			**5.95**	**$3,830.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Ignition Coils
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Instrument Panel Clusters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	37.30	$29,840.00
Marcus N. Bozeman	A	$650.00	49.20	$31,980.00
Cydni B. Arterbury	PL	$200.00	9.80	$1,960.00
		$		$
		$		$
		$		$
TOTALS			**96.30**	**$63,780.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Instrument Panel Clusters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Inverters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.90	$1,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**2.60**	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Inverters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Motor Generators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.70	$1,360.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**2.40**	**$1,500.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Motor Generators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Power Window Motors
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.90	$1,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**2.60**	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Power Window Motors
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Power Window Switches
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	0.80	$640.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.30	$60.00
		$		$
		$		$
		$		$
TOTALS			**1.10**	**$700.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Power Window Switches
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Radiators
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	0.90	$720.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.30	$60.00
		$		$
		$		$
		$		$
TOTALS			**1.20**	**$780.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Radiators
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Spark Plugs
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.10	$880.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Atterbury	PL	$200.00	1.00	$200.00
		$		$
		$		$
		$		$
TOTALS			**2.10**	**$1,080.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Spark Plugs
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Starters
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.90	$1,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			2.60	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Starters
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Valve Timing Control Devices
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	2.20	$1,760.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	1.10	$220.00
		$		$
		$		$
		$		$
TOTALS			**3.30**	**$1,980.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Valve Timing Control Devices
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Windshield Washer Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.20	$960.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			**1.90**	**$1,100.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Windshield Washer Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Windshield Wiper Systems
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	1.90	$1,520.00
Marcus N. Bozeman	A	$650.00	0.00	$0.00
Cydni B. Arterbury	PL	$200.00	0.70	$140.00
		$		$
		$		$
		$		$
TOTALS			2.60	**$1,660.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Windshield Wiper Systems
Reporting Period: **Inception to August 31, 2016**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

LODESTAR SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Wire Harness
Reporting Period: **Inception – August 31, 2016**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Thomas P. Thrash	P	$800.00	922.65	$738,812.00
Marcus N. Bozeman	A	$650.00	561.80	$365,170.00
Cydni B. Arterbury	PL	$200.00	289.35	$57,870.00
		$		$
		$		$
		$		$
TOTALS			**1,773.80**	**$1,161,160.00**

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

In Re: Auto Parts Antitrust Litigation
MDL 2311

EXPENSE / DISBURSEMENT SUMMARY

Firm: **THRASH LAW FIRM, P.A.**
Case: Wire Harness
Reporting Period: **Inception to August 31, 2016**

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