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CRAIG C. CORBITT (83251)  
2 CHRISTOPHER T. MICHELETTI (136446)  
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7 *Lead and Liaison Counsel for*  
*Indirect Purchaser Class*

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **OAKLAND DIVISION**

12 IN RE STATIC RANDOM ACCESS  
MEMORY (SRAM) ANTITRUST  
13 LITIGATION

Case No. 4:07-md-1819 CW  
MDL No. 1819

14 **SECOND SUPPLEMENTAL DECLARATION**  
**OF CHRISTOPHER T. MICHELETTI IN**  
15 **SUPPORT OF MOTION FOR INTERIM**  
**REIMBURSEMENT OF EXPENSES**

16 This Document Relates to:

17 ALL INDIRECT PURCHASER ACTIONS

Hearing Date: September 30, 2010  
Time: 2:00 p.m.  
Courtroom: 2, 4<sup>th</sup> Floor  
Judge: Hon. Claudia Wilken

19  
20 I, Christopher T. Micheletti, declare and state as follows:

21 1. I am a member in good standing of the State Bar of California and am a member of  
22 the firm Zelle Hofmann Voelbel & Mason LLP, Lead and Liaison Counsel for the Indirect Purchaser  
23 Class. I am duly licensed to practice before the Supreme Court of the State of California and all  
24 other inferior courts of this State. I am admitted to practice before the United States Supreme Court,  
25 the Court of Appeals for the Ninth Circuit, and the Federal District Court for the Northern District of  
26 California. I am also admitted to practice before the United States Court of Appeal for the Sixth  
27 Circuit. This Declaration is based on personal knowledge, except where specified that information is  
28 based on information and belief, and if called to testify, I could and would do so competently as to

1 the matters set forth herein.

2           2.       I submit this supplemental declaration pursuant to 28 U.S.C. § 1746 in support of  
3 Indirect Purchaser (“IP”) Plaintiffs’ Motion for Interim Reimbursement of Expenses and pursuant to  
4 the request of the Court at the September 30, 2010 hearing, and to correct certain prior submissions.

5           3.       To finance the prosecution of this litigation, Class Counsel established a litigation  
6 fund for this case (the “Litigation Fund”) into which IP Plaintiffs’ firms contributed in the form of  
7 assessments, and from which reasonable and necessary litigation expenses were paid. These  
8 payments included expert bills, special master fees, mediator fees, court reporting fees and expenses,  
9 translation fees and expenses, service of process, and document reproduction costs, among other  
10 costs. The assessments to the Litigation Fund paid by all firms that made contributions to date  
11 totaled \$1,995,209.45. Payments from the litigation fund used to pay the aforementioned expenses  
12 total \$1,980,821.72. Attached hereto as Exhibit 1 is an itemized listing of expenditures made from  
13 the Litigation Fund.

14           4.       The declarations of IP Class Counsel supporting IP Plaintiffs’ request for  
15 reimbursement are collected in Exhibit B to my August 26, 2010 Declaration (“August 26  
16 Declaration”) (DE 1084-4). We have reviewed the individual entries in each Exhibit 1 to the  
17 declarations of each IP Class Counsel firm whose declaration is included in my August 26  
18 Declaration. In some instances, the totals of the expenses listed for the firm are in error. A chart  
19 showing the correct totals of the itemized amounts for these firms is attached as Exhibit 2.

20           5.       Finally, we have also discovered that two firms inadvertently miscategorized certain  
21 payments they made—although their total expense amounts are correct and remain unchanged.  
22 Those two firms’ revised charts are attached hereto as Exhibit 3. And, one firm under-reported its  
23 assessment payments. That firm’s revised chart of expenses is attached as Exhibit 4.

24           6.       A corrected version of Exhibit A to my August 26 Declaration is attached hereto as  
25 Exhibit 5, which reflects the above revisions and all firms’ unreimbursed costs and expenses for  
26 which reimbursement is sought at this time. As reflected in that Exhibit, IP Plaintiffs seek  
27 reimbursement of \$3,868,446.97 in unreimbursed costs and expenses incurred in this Action.

28



# EXHIBIT 1

SRAM LITIGATION EXPENSES AND COSTS  
PAID FROM LITIGATION FUND  
(INCEPTION THROUGH JUNE 30, 2010)

<b>Description</b>	<b>Amount</b>
Court Reporters/Transcripts	\$ 63,370.82
Document Reproduction	\$ 33,478.77
Experts/Consultants	\$ 1,757,219.26
Foreign Document Translation	\$ 4,854.02
Service of Process	\$ 55,937.75
Special Master/Mediation	\$ 52,968.73
Other – software licensing, telephone conferences, industry reports	\$ 12,992.37
<b>TOTAL EXPENSES</b>	<b>\$ 1,980,821.72</b>

# EXHIBIT 2

SRAM CORRECTED TOTALS FOR  
UNREIMBURSED LITIGATION COSTS AND EXPENSES  
INCURRED BY INDIRECT PURCHASER PLAINTIFF CLASS COUNSEL

<b>Firm</b>	<b>Total Reported in August 26, 2010 Micheletti Declaration re: Interim Reimbursement of Expenses, Exhibit B</b>	<b>Corrected Total</b>
Glancy Binkow & Goldberg LLP	\$58,995.17	\$ 58,994.82
Law Office of Brian Barry	\$144,891.60	\$ 144,841.60
Law Office of Krishna B. Narine, P.C.	\$1,422.25	\$ 1,422.50
Murray & Howard LLP	\$5,073.38	\$ 5,449.66
Shepherd, Finkelman, Miller & Shah, LLP <sup>1</sup>	\$243,934.40	\$ 268,934.40

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<sup>1</sup> Includes assessment payment amount inadvertently omitted from expense submission. See Exhibit 4 hereto.

# EXHIBIT 3

MICHAEL J. FLANNERY (State Bar No. 196266)  
JAMES J. ROSEMERGY  
8235 Forsyth Boulevard  
Suite 1100  
Saint Louis, MO 63105  
314-725-7700  
314-721-0905 (fax)  
[mflannery@careydanis.com](mailto:mflannery@careydanis.com)  
[jrosemergy@careydanis.com](mailto:jrosemergy@careydanis.com)

*Counsel for Indirect Purchaser Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE STATIC RANDOM ACCESS  
MEMORY (SRAM) ANTITRUST  
LITIGATION

Case No. 4:07-md-1819 CW

MDL No. 1819

**SUPPLEMENTAL DECLARATION OF  
JAMES J. ROSEMERGY IN SUPPORT OF  
APPLICATION FOR INTERIM  
REIMBURSEMENT OF EXPENSES FILED  
ON BEHALF OF CAREY, DANIS & LOWE**

This Document Relates to:  
ALL INDIRECT PURCHASER ACTIONS

Judge: Hon. Claudia Wilken

I, James J. Rosemergy, declare and state as follows:

1. I am an attorney with the law firm of Carey, Danis & Lowe. I submit this declaration pursuant to 28 U.S.C. § 1746 in support of Class Counsel’s joint application for interim reimbursement of expenses incurred by Indirect Purchaser Plaintiffs’ counsel in connection with this litigation.

2. My firm has acted as counsel to Indirect Purchaser Plaintiffs in this class action.

3. As detailed in Corrected Exhibit 1, Carey, Danis & Lowe has incurred a total of \$5,570.78 in unreimbursed litigation costs and expenses through June 30, 2010 in connection with the prosecution of the Indirect Purchaser Actions in this litigation.

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4. The Declaration of Michael J. Flannery in Support of Application for Interim Reimbursement of Expenses Filed on Behalf of Carey, Danis & Lowe, dated August 20, 2010 and submitted as part of Exhibit B to the Declaration of Christopher T. Micheletti in Support of Motion for Interim Reimbursement of Expenses (the "Flannery Declaration") (Docket Entry 1084-4), incorrectly listed \$5,000 in unreimbursed litigation expenses in the "Assessments" column of Exhibit 1 to the Flannery Declaration. Said amount should have been listed in the "Professional Fees" column of Exhibit 1 to the Flannery Declaration.

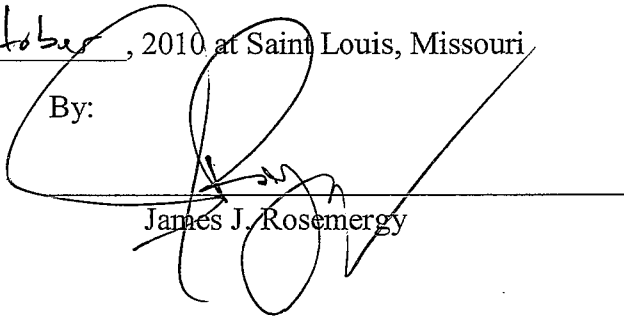
5. The attached Corrected Exhibit 1 reflects the above-described correction to the unreimbursed litigation expenses sought by my firm.

6. The costs and expenses incurred in this action are reflected on the books and records of Carey, Danis & Lowe. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the costs and expenses incurred.

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

Executed on this 4<sup>th</sup> day of October, 2010 at Saint Louis, Missouri

By:



James J. Rosemergy

**CORRECTED EXHIBIT 1**

In re SRAM Antitrust Litigation – Indirect Purchaser Actions

Case No. 4:07-md-1819 CW; MDL No. 1819

CAREY, DANIS &amp; LOWE

LITIGATION COSTS AND EXPENSES INCURRED

FOR THE PERIOD: INCEPTION THROUGH JUNE 30, 2010

Description	Total
Assessments	\$00.00
Commercial Copies	\$00.00
Internal Reproduction/Copies	\$00.00
Computer Research	\$00.00
Court Fees (filing, etc.)	\$00.00
Court Reporters/Transcripts	\$00.00
Telephone/Fax	\$527.82
Postage/Express Delivery/Couriers	\$42.96
Professional Fees (expert/investigator, etc.)	\$5,000.00
Witness/Service Fees	\$00.00
Travel (Transportation, lodging, meals, etc.)	\$00.00
Miscellaneous	\$00.00
Process/Service Fees	\$00.00
<b>TOTAL EXPENSES</b>	<b>\$5,570.78</b>

1 DONALD L. PERELMAN  
FINE, KAPLAN AND BLACK, RPC  
2 1835 MARKET STREET, 28<sup>TH</sup> FLOOR  
PHILADELPHIA, PA 19103  
3 (215) 567-6565  
(215) 568-5872  
4 [dperelman@finekaplan.com](mailto:dperelman@finekaplan.com)

5 *Counsel for Indirect Purchaser Class*

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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 IN RE STATIC RANDOM ACCESS  
14 MEMORY (SRAM) ANTITRUST  
LITIGATION

Case No. 4:07-md-1819 CW

MDL No. 1819

**SUPPLEMENTAL DECLARATION OF  
DONALD L. PERELMAN IN SUPPORT OF  
APPLICATION FOR INTERIM  
REIMBURSEMENT OF EXPENSES FILED  
ON BEHALF OF FINE, KAPLAN AND  
BLACK, R.P.C.**

15  
16 This Document Relates to:  
17 ALL INDIRECT PURCHASER ACTIONS

Judge: Hon. Claudia Wilken

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20 I, DONALD L. PERELMAN, declare and state as follows:

21 1. I am a member of the law firm of Fine, Kaplan and Black, R.P.C. I submit  
22 this declaration pursuant to 28 U.S.C. § 1746 in support of Class Counsel's joint application for  
23 interim reimbursement of expenses incurred by Indirect Purchaser Plaintiffs' counsel in connection  
24 with this litigation.

25 2. My firm has acted as counsel to Plaintiff Henry Kornegay in this class action.

26 3. As detailed in Corrected Exhibit 1, Fine, Kaplan and Black, R.P.C. has  
27 incurred a total of \$25,391.14 in unreimbursed litigation costs and expenses through June 30, 2010  
28 in connection with the prosecution of the Indirect Purchaser Actions in this litigation.

1           4.       The Declaration of Donald L. Perelman in Support of Application for Interim  
2 Reimbursement of Expenses Filed on Behalf of Fine, Kaplan and Black, R.P.C., dated July 7, 2010  
3 and submitted as part of Exhibit B to the Declaration of Christopher T. Micheletti in Support of  
4 Motion for Interim Reimbursement of Expenses (the "Perelman Declaration") (Docket Entry 1084-  
5 4), incorrectly listed \$25,000 in unreimbursed litigation expenses in the "Assessments" column of  
6 Exhibit 1 to the Perelman Declaration. Of that amount, \$10,000 should have been listed in the  
7 "Professional Fees" column of Exhibit 1 to the Perelman Declaration.

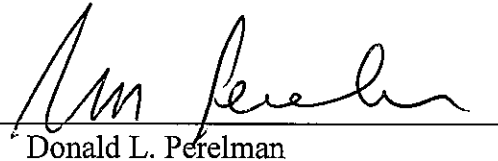
8           5.       The attached Corrected Exhibit 1 reflects the above-described correction to  
9 the unreimbursed litigation expenses sought by my firm.

10           6.       The costs and expenses incurred in this action are reflected on the books and  
11 records of Fine, Kaplan and Black, R.P.C.. These books and records are prepared from expense  
12 vouchers, check records and other source materials and represent an accurate recordation of the costs  
13 and expenses incurred.

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

16           Executed on this 4<sup>th</sup> day of October, 2010 at Philadelphia, Pennsylvania.

17           By:

18             
19           \_\_\_\_\_  
20           Donald L. Perelman

CORRECTED EXHIBIT 1

In re SRAM Antitrust Litigation – Indirect Purchaser Actions  
Case No. 4:07-md-1819 CW; MDL No. 1819  
FINE, KAPLAN AND BLACK, R.P.C.  
LITIGATION COSTS AND EXPENSES INCURRED  
FOR THE PERIOD: INCEPTION THROUGH JUNE 30, 2010

Description	Total
Assessments	\$15,000.00
Commercial Copies	\$00.00
Internal Reproduction/Copies	\$157.80
Computer Research	\$00.00
Court Fees (filing, etc.)	\$210.00
Court Reporters/Transcripts	\$00.00
Telephone/Fax	\$00.00
Postage/Express Delivery/Couriers	\$23.34
Professional Fees (expert/investigator, etc.)	\$10,000.00
Witness/Service Fees	\$00.00
Travel (Transportation, lodging, meals, etc.)	\$00.00
Miscellaneous	\$00.00
Process/Service Fees	\$00.00
<b>TOTAL EXPENSES</b>	<b>\$25,391.14</b>

# EXHIBIT 4

1 Natalie Finkelman Bennett  
SHEPHERD, FINKELMAN, MILLER & SHAH, LLP  
2 35 E. State Street  
Media, PA 19063  
3 Telephone: 610-891-9880  
Facsimile: 610-891-9883  
4

5 *Counsel for Indirect Purchaser Class*  
6  
7

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 OAKLAND DIVISION

11 IN RE STATIC RANDOM ACCESS  
MEMORY (SRAM) ANTITRUST  
LITIGATION

Case No. 4:07-md-1819 CW

MDL No. 1819

**SUPPLEMENTAL DECLARATION OF  
NATALIE FINKELMAN BENNETT IN  
SUPPORT OF APPLICATION FOR  
INTERIM REIMBURSEMENT OF  
EXPENSES FILED ON BEHALF OF  
SHEPHERD, FINKELMAN, MILLER &  
SHAH, LLP**

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14 This Document Relates to:  
15 ALL INDIRECT PURCHASER ACTIONS

Hearing Date: September 30, 2010  
Time: 2:00 p.m.  
Courtroom: 2, 4<sup>th</sup> Floor  
Judge: Hon. Claudia Wilken

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19  
20 I, Natalie Finkelman Bennett declare and state as follows:

21 1. I am a member of the law firm of Shepherd, Finkelman, Miller & Shah,  
22 LLP. I submit this declaration pursuant to 28 U.S.C. § 1746 in support of Class Counsel's joint  
23 application for interim reimbursement of expenses incurred by Indirect Purchaser Plaintiffs'  
24 counsel in connection with this litigation.

25 2. My firm has acted as counsel to Plaintiffs Lara Sterenberg and Christopher  
26 Stawski and counsel to Indirect Purchaser Plaintiffs in this class action. In addition, my firm is a  
27 member of the Steering Committee in this class action.

28 3. As detailed in Corrected Exhibit 1, Shepherd, Finkelman, Miller & Shah,

1 LLP has incurred a total of \$268,934.40 in unreimbursed litigation costs and expenses through  
2 June 30, 2010 in connection with the prosecution of the Indirect Purchaser Actions in this  
3 litigation.

4 4. The Declaration of Natalie Finkelman Bennett in Support of Application for  
5 Interim Reimbursement of Expenses Filed on Behalf of Shepherd, Finkelman, Miller & Shah,  
6 LLP, dated July 28, 2010 and submitted as part of Exhibit B to the Declaration of Christopher T.  
7 Micheletti in Support of Motion for Interim Reimbursement of Expenses, incorrectly listed our  
8 firm's contributions to the Litigation Fund at \$165,000. The correct amount is \$190,000. When  
9 our firm changed banks the amount contributed to the Litigation Fund from a check written on our  
10 former bank was inadvertently left off the final total. The corrected amount of \$190,000 is  
11 supported by records kept by counsel in charge of the Litigation Fund.  
12

13 5. The Corrected Exhibit 1 reflects the above-described correction to the  
14 unreimbursed litigation expenses sought by my firm, which totals \$268,934.40.

15 6. The costs and expenses incurred in this action are reflected on the books  
16 and records of Shepherd, Finkelman, Miller & Shah, LLP. These books and records are prepared  
17 from expense vouchers, check records and other source materials and represent an accurate  
18 recordation of the costs and expenses incurred.  
19

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

22 Executed on this 4<sup>th</sup> day of October, 2010 at Media, Pennsylvania.

23 By:

24   
25 \_\_\_\_\_  
26 Natalie Finkelman Bennett  
27  
28

CORRECTED EXHIBIT 1

In re SRAM Antitrust Litigation – Indirect Purchaser Actions  
Case No. 4:07-md-1819 CW; MDL No. 1819  
SHEPHERD, FINKELMAN, MILLER & SHAH, LLP  
LITIGATION COSTS AND EXPENSES INCURRED  
FOR THE PERIOD: INCEPTION THROUGH JUNE 30, 2010

Description	Total
Assessments	\$190,000.00
Commercial Copies	\$00.00
Internal Reproduction/Copies	\$4525.75
Computer Research	\$1228.81
Court Fees (filing, etc.)	\$350.00
Court Reporters/Transcripts	\$522.15
Telephone/Fax	\$250.44
Postage/Express Delivery/Couriers	\$664.70
Professional Fees (expert/investigator, etc.)	\$50,000.00
Witness/Service Fees	\$00.00
Travel (Transportation, lodging, meals, etc.)	\$21,392.55
Miscellaneous	\$00.00
Process/Service Fees	\$00.00
<b>TOTAL EXPENSES</b>	<b>\$268,934.40</b>

# EXHIBIT 5

**Corrected Unreimbursed Litigation Costs and Expenses Incurred By  
Indirect Purchaser Plaintiff Class Counsel in the  
*In re Static Random Access Memory (SRAM) Antitrust Litigation***

<b>Firm</b>	<b>Total Expenses</b>
Bailey & Glasser, LLP	\$62,026.56
Bangs, McCullen, Butler, Foye & Simmons, LLP	\$882.72
Carey, Danis & Lowe	\$5,570.78
The Coffman Law Firm	\$4,778.37
Cooper & Kirkham, P.C.	\$15,049.91
Criden & Love, P.A.	\$2,354.01
Davis, Cowell & Bowe, LLP	\$24,423.29
DuretteBradshaw PLC	\$28,053.18
Emerson Poynter LLP	\$27,522.89
Fine, Kaplan and Black, R.P.C	\$25,391.14
Finkelstein Thompson, LLP	\$21,728.85
Frankovitch, Anetakis, Colantonio & Simon	\$6,272.44
Freedman Boyd Hollander Goldberg Ives & Duncan, PA	\$7,024.88
The Furth Firm LLP	\$36,247.36
Futterman Howard Ashley Watkins & Weltman, P.C.	\$20,268.69
Gergosian & Gralewski LLP	\$72,984.56
Girard Gibbs LLP	\$83,186.62
Glancy Binkow & Goldberg LLP	\$58,994.82
Godfrey & Kahn, S.C.	\$14,582.96
Goldberg Katzman, P.C.	\$28,799.02
Goldman Scarlato & Karon, P.C.	\$9,019.21
Graves Bartle Marcus & Garrett, LLC	\$142.81
Gross Belsky Alonso LLP	\$117,964.58
Gustafson Gluek PLLC	\$115,415.19
Hisaka Yoshida & Cosgrove	\$1,318.58
Hulett Harper Stewart LLP	\$36,745.49
Ingaldson Maassen & Fitzgerald, P.C.	\$461.75
Jimenez, Graffam & Lausell	\$458.60
Johnson & Perkinson	\$3,653.57
Kirby McInerney LLP	\$10,889.55
Krause, Kalfayan, Benink and Slavens, LLP	\$35,166.71
LaCava & Lief, S.C.	\$375.00
Lanham Blackwell, P.A.	\$17,603.70
Law Office of Krishna B. Narine, P.C.	\$1,422.50
Law Offices of Brian Barry	\$144,841.60
Law Offices of Lawrence G. Papale	\$2,742.92
Lieff, Cabraser, Heimann & Bernstein, LLP	\$341,417.95

**Corrected Unreimbursed Litigation Costs and Expenses Incurred By  
Indirect Purchaser Plaintiff Class Counsel in the  
*In re Static Random Access Memory (SRAM) Antitrust Litigation***

<b>Firm</b>	<b>Total Expenses</b>
Lingel H. Winters Prof. Corp.	\$350.00
Lockridge Grindal Nauen P.L.L.P.	\$114,526.67
Lowther Johnson Attorneys At Law, LLC	\$511.27
McKay, Burton & Thurman, PC	\$304.03
McManis Faulkner	\$16,522.71
Michaels, Ward & Rabinovitz, LLP	\$1,691.84
The Miller Law Firm, P.C.	\$590.82
Minami Tamaki LLP	\$1,403.60
The Mogin Law Firm, P.C.	\$50,959.41
Montgomery, Goff & Bullis, P.C.	\$350.00
Murray & Howard LLP	\$5,449.66
Orson and Brusini Ltd.	\$601.15
Reinhardt Wendorf & Blanchfield	\$1,802.83
RodaNast, P.C.	\$133,382.44
Shepherd, Finkelman, Miller & Shah, LLP	\$268,934.40
Skinner Law Firm	\$785.01
Steyer Lowenthal Boodrookas Alvarez & Smith LLP	\$86,291.64
Straus & Boies, LLP	\$126,087.27
Tollison Law Firm, P.A.	\$6,072.06
Towe, Ball, Enright, Mackey & Sommerfeld, P.L.L.P.	\$10,850.30
Trujillo Rodriguez & Richards, LLC	\$7,366.84
Trump, Alioto, Trump & Prescott, LLP	\$41,047.38
Wasserman, Comden, Casselman & Esensten, L.L.P.	\$72,777.93
Wexler Wallace LLP	\$6,735.76
Wiener & Gould, P.C.	\$401.00
William M. Straus, Esq.	\$780.27
Youtz & Valdez, P.C.	\$867.21
Zelle Hofmann Voelbel & Mason LLP	\$1,539,608.44
<i>Preliminary Total:</i>	\$3,882,834.70
<i>Minus Litigation Fund Balance:</i>	\$14,387.73
<b>FINAL TOTAL:</b>	<b>\$3,868,446.97</b>