

1 Roger M. Schrimp, SBN 39379
Fred A. Silva, SBN 128464
2 Kathy L. Monday, SBN 209084
DAMRELL, NELSON, SCHRIMP,
3 PALLIOS, PACHER & SILVA
1601 "I" Street, Fifth Floor
4 Modesto, California 95354
Tel: (209) 526-3500
5 Fax: (209) 526-3534

6 *Attorneys for Plaintiff Hawel A.
Hawel*
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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
12

13 IN RE: CRT ANTITRUST LITIGATION

Master File No. CV-07-5944-SC
MDL No. 1917

14
15 This Document Relates to:

CLASS ACTION

16 ALL DIRECT PURCHASER CLASS
17 ACTIONS

**DECLARATION OF KATHY L.
MONDAY IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
INCENTIVE AWARDS**

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1 I, Kathy L. Monday, declare and state as follows:

2 1. I am a member of the law firm of Damrell, Nelson, Schrimp, Pallios, Pacher &
3 Silva. I submit this declaration in support of Direct Purchaser Plaintiffs (“DPP”) joint application
4 for an award of attorney fees in connection with the services rendered in this litigation. I make this
5 Declaration based on my personal knowledge and if called as a witness, I could and would
6 competently testify to the matters stated herein.

7 2. My firm has served as counsel to Hawel A. Hawel and as counsel for the class
8 throughout the course of this litigation. The background and experience of the Damrell, Nelson,
9 Schrimp, Pallios, Pacher & Silva firm and its attorneys are summarized in the *curriculum vitae*
10 attached hereto as Exhibit 1.

11 3. The law firm of Damrell, Nelson, Schrimp, Pallios, Pacher & Silva has prosecuted
12 this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any
13 compensation for prosecuting claims against the defendants. While the Damrell, Nelson, Schrimp,
14 Pallios, Pacher & Silva firm devoted its time and resources to this matter, it has foregone other
15 legal work for which it would have been compensated.

16 4. During the pendency of the litigation, the Damrell, Nelson, Schrimp, Pallios,
17 Pacher & Silva firm performed the following work:

18 A. Reviewed and produced client’s documents pursuant to discovery demands; and
19 prepared discovery responses

20 B. Factual investigation of Daewoo entities

21 C. Worked on Opposition to Daewoo International Corporation’s Motion to
22 Dismiss

23 D. Prepared and produced client Hawel A. Hawel for deposition, and attended
24 subsequent deposition

25 5. Attached hereto as Exhibit 2 is my firm’s total hours and lodestar, computed at
26 historical rates, from May 9, 2008 through July 31, 2014. This period reflects the time spent after
27 the appointment of Lead Counsel in the litigation. The total number of hours spent by the
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1 Damrell, Nelson, Schrimp, Pallios, Pacher & Silva firm during this period of time was 212.55 with
2 a corresponding lodestar of \$70,657.50. This summary was prepared from contemporaneous,
3 daily time records regularly prepared and maintained by my firm. The lodestar amount reflected in
4 Exhibit 2 is for work assigned by Lead Class Counsel, and was performed by professional staff at
5 my law firm for the benefit of the Direct Purchaser Plaintiff (“DPP”) Class.

6 6. The hourly rates for the attorneys and professional support staff in my firm
7 included in Exhibit 2 are the usual and customary hourly rates charged by the Damrell, Nelson,
8 Schrimp, Pallios, Pacher & Silva firm.

9 7. My firm has expended a total of \$2,189.56 in unreimbursed costs and expenses in
10 connection with the prosecution of this litigation. These costs and expenses are broken down in
11 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs
12 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this
13 action are reflected on the books and records of my firm. These books and records are prepared
14 from expense vouchers, check records and other source materials and represent an accurate
15 recordation of the expenses incurred.

16 8. The firm of Damrell, Nelson, Schrimp, Pallios, Pacher & Silva paid a total of
17 \$20,000 in assessments for the joint prosecution of the litigation against the defendants.

18 9. I have reviewed the time and expenses reported by my firm in this case which are
19 included in this declaration, and I affirm that they are true and accurate.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed on August 12, 2014 in Modesto, California.

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23 
24 **KATHY L. MONDAY**

EXHIBIT 1

Damrell, Nelson, Schrimp, Pallios, Pacher & Silva

For more than 45 years, the law firm of Damrell, Nelson, Schrimp, Pallios, Pacher & Silva has served the legal needs of Northern California businesses, individuals, and families with its Main Office in Modesto and branch offices in Sacramento and Oakdale. The firm owes its longevity and success to our dedicated attorneys who provide consistently excellent representation across a spectrum of practice areas, from complex corporate litigation to estate planning. We maintain an AV Preeminent rating from Martindale-Hubbell, the national directory of attorneys, which is the highest ranking available to members of the legal community.

With an established reputation among attorneys in Northern California, our group of exceptionally qualified and skilled lawyers is capable of handling even the most complicated matters, saving many clients the trouble of seeking legal counsel outside of Stanislaus County. For Central Valley businesses of all sizes, the Damrell firm can assist in entity formation, franchising and licensing, employment and labor, and other general corporate matters. The firm is ideally situated to represent clients in the agricultural industry, handling not only real estate matters on behalf of agribusinesses, but also legal issues related to livestock sales and purchases, farm employment, and agricultural cooperatives. In addition, we provide comprehensive legal services to many vineyards and wine makers in the region.

Beyond transactional work, the Damrell firm regularly engages in major commercial litigation in California state and federal courts. Our attorneys have successfully tried cases involving multiple parties and novel issues, including class actions, antitrust litigation, and business disputes with industry-impacting outcomes. In some instances, we partner with other lawyers, Modesto-based and from elsewhere in California, to handle especially complex cases.

The Damrell firm also represents clients in the areas of personal injury, family law, and estate planning. For accident victims and their families, our attorneys have obtained numerous high dollar financial recoveries, establishing the firm's reputation for jury trial victories in injury lawsuits. In family law matters and estate planning, we provide highly particularized legal services tailored to each client's unique needs and goals.

EXHIBIT 1

EXHIBIT 2

EXHIBIT 3

In re Cathode Ray Tube (CRT) Antitrust Litigation
 Damrell, Nelson, Schrimp, Pallios, Pacher & Silva
 Reported Expenses Incurred on Behalf of DPPs

CATEGORY	AMOUNT INCURRED
Court Fees (filing, etc.)	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Computer Research	\$660.60
Messenger Delivery	
Photocopies – In House	
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	\$1,528.96
TOTAL:	\$2,189.56

EXHIBIT 3