

1 Guido Saveri (Bar No. 22349)  
 R. Alexander Saveri (Bar No. 173102)  
 2 Geoffrey C. Rushing (Bar No. 126910)  
 Cadio Zirpoli (Bar No. 179108)  
 3 **SAVERI & SAVERI, INC.**  
 4 706 Sansome Street  
 San Francisco, California 94111  
 5 Telephone: (415) 217-6810  
 Facsimile: (415) 217-6813  
 6

7 *Interim Lead Counsel for the*  
*Direct Purchaser Plaintiffs*  
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 10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN FRANCISCO DIVISION**  
 13

14 IN RE: CRT ANTITRUST LITIGATION

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

15  
 16 This Document Relates to:

**CLASS ACTION**

17 ALL DIRECT PURCHASER CLASS  
 18 ACTIONS

**DECLARATION OF MARC H. EDELSON  
 IN SUPPORT OF MOTION FOR  
 ATTORNEYS' FEES, REIMBURSEMENT  
 OF EXPENSES, AND INCENTIVE  
 AWARDS**

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1 I, Marc H. Edelson, declare and state as follows:

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

7 2. My firm has served as counsel to Nathan Muchnick, Inc. and as counsel for the  
8 class throughout the course of this litigation. The background and experience of the Edelson &  
9 Associates, LLC firm and its attorneys are summarized in the *curriculum vitae* attached hereto as  
10 Exhibit 1.

11 3. Edelson & Associates, LLC has prosecuted this litigation solely on a contingent-  
12 fee basis, and has been at risk that it would not receive any compensation for prosecuting claims  
13 against the defendants. While Edelson & Associates, LLC devoted its time and resources to this  
14 matter, it has foregone other legal work for which it would have been compensated.

15 4. During the pendency of the litigation, Edelson & Associates, LLC performed the  
16 following work: review of documents produced by defendants.

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18 5. Attached hereto as Exhibit 2 is my firm’s total hours and lodestar, computed at  
19 historical rates, from May 9, 2008 through July 31, 2014. This period reflects the time spent after  
20 the appointment of Lead Counsel in the litigation. The total number of hours spent by Edelson &  
21 Associates, LLC during this period of time was 165.50 with a corresponding lodestar of  
22 \$73,833.00. This summary was prepared from contemporaneous, daily time records regularly  
23 prepared and maintained by my firm. The lodestar amount reflected in Exhibit 2 is for work  
24 assigned by Lead Class Counsel, and was performed by professional staff at my law firm for the  
25 benefit of the Direct Purchaser Plaintiff (“DPP”) Class.

26 6. The hourly rates for the attorneys and professional support staff in my firm  
27 included in Exhibit 2 are the usual and customary hourly rates charged by Edelson & Associates,  
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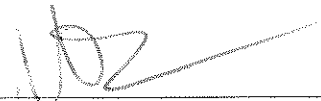
LLC.

7. My firm has expended a total of \$3,147.46 in unreimbursed costs and expenses in connection with the prosecution of this litigation. These costs and expenses are broken down in the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

8. Edelson & Associates, LLC paid a total of \$ 20,000.00 in assessments for the joint prosecution of the litigation against the defendants.

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

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 21, 2014 at Doylestown, Pennsylvania.



**Marc H. Edelson**

# **EXHIBIT 1**

## **BIOGRAPHY OF & EDELSON & ASSOCIATES, LLC**

Edelson & Associates, LLC has been engaged in the practice of complex and class action litigation since 2003. Prior to forming Edelson & Associates, LLC, Marc H. Edelson was the founder and managing partner of Hoffman & Edelson, LLC which focused on class action litigation exclusively since its formation in 1990.

As a partner at Hoffman & Edelson, LLC, Marc Edelson has served as lead counsel or as a member of the Executive Committee in numerous important cases including:

In re Pharmaceutical Industry Average Wholesale Price Litigation: MDL 1456, Civil Action No. 01-cv-12257, United States District Court for the District of Massachusetts (co-lead counsel)

In re Copper Antitrust Litigation: MDL Docket No. 1303 United States District Court for the Western District of Wisconsin (member of executive committee)

In re Western States Wholesale Natural Gas Antitrust Litigation, MDL-1566, Civil Action No. 2:03-cv-01431 United States District Court for the District of Nevada (co-lead counsel)

In re Ciprofloxacin Hydrochloride Antitrust Litigation MDL-001383, United States District Court Eastern District of New York (co-lead counsel)

In re Premarin Antitrust Litigation Civil Action No. 1:01cv447 United States District Court for the Southern District of Ohio Western Division at Cincinnati (co-lead counsel)

Elizabeth Blevins v. Wyeth-Ayerst Laboratories, Inc., No. 324380, Superior Court of the State of CA, County of San Francisco (co-lead counsel)

Denise Roberts v. Fleet Bank (RI), National Association and Fleet Credit Card Services, L.P., Civil Action, No. 00-CV-6142.

In the United States District Court for the Eastern District of PA  
United States Court of Appeals for the Third Circuit, No. 01-442 (co-lead counsel)

Jason Tesauro and Elizabeth Eley v. The Quigley Corporation,  
No. 00-1011, Philadelphia County, Court of Common Pleas (co-lead counsel)

Lyndah Wise v. Union Acceptance Corporation, No. 01-C-8479  
United States District Court for the Northern District of Illinois (co-lead counsel)

Rudi Rodriguez v. Ford Motor Credit Company, Case No. 01-C 8526  
United States District Court for the Northern District of Illinois (co-lead counsel)

Joseph and Cynthia Papa v. General Electric Capital Mortgage Services, Inc.,  
Superior Court of New Jersey, Camden County, Docket No. L-5311-97 (co-lead counsel)

Renee C. Pegram et al. v. Beneficial Corp., Superior Court of New Jersey-Law  
Division-Camden County, Docket No. L-8308-97 (co-lead counsel)

Karen and Barry Gartland v. Beneficial Corp., Beneficial Management Corp.  
Of America, and Beneficial Consumer Discount Company, Court of Common  
Pleas, Philadelphia County, No. 1535 (co-lead counsel)

Eric Schonning v. Abit (USA) Computer Corporation, Superior Court of the State of  
California, County of Alameda, Case No. RGO3109308 (co-lead counsel)

Edelson & Associates, LLC has served as lead counsel in the following cases:

New England Carpenters Health Benefits Fund et al. v. First DataBank, Inc. and  
Mckesson Corp., Civil Action No. 1:05-cv-11148, United States District Court for the  
District of Massachusetts (settled for \$350 million) (co-lead counsel)

Electronic Connections Services, Corp. v. MSI Computer Corp., et al., Superior Court of  
the State of California, County of Los Angeles, Case No. BC316232 (settled) (lead  
counsel)

Eric Schonning v. Jetway Computer Corp., Superior Court State of California, County of  
Alameda, Case No.: RG05-214870 (settled) (lead counsel)

Electronic Connection Services Corp. v. MSI Computer Corp., Superior Court of the  
State of California, County of Los Angeles, Case No.: RG316232 (settled) (lead counsel)

Gerald J. Normandin, Jr. v. Soyo Group, Inc., Superior Court of the State of California,  
County of San Bernardino, Rancho Cucomonga, Case No.: RCV082128 (settled) (lead

counsel)

Edelson & Associates, LLC has served on the Executive Committee of the following cases:

In re Certaineed Corp. Roofing Shingle Product Liability Litigation, United States District Court Eastern District of Pennsylvania, MDL Docket No. 1817 (settled)

In re HP Inkjet Printer Litigation, United States District Court Northern District of California (San Jose Division) Case No.: C053580JF (settled)

In addition to the above, Edelson & Associates, LLC is involved in numerous other cases in which it has no defined official title.

Marc H. Edelson is the founder of Edelson & Associates, LLC. Mr. Edelson is a graduate of The Wharton School of The University of Pennsylvania (B.S. 1984 cum laude) and The University of California, Los Angeles School of Law (J.D. 1987). Mr. Edelson is admitted to practice in New York (admitted 1988) and Pennsylvania (admitted 1988).

Liberato P. Verderame is a graduate of Villanova University (B.A. 1994) and Villanova University School of Law (J.D. 1997). Mr. Verderame is admitted to practice in Pennsylvania (admitted 1997) and New Jersey (admitted 1997).

Joseph P. Klein is a graduate of Temple University (B.A. 1986) and the Temple University School of Law (J.D. 1990). Mr. Klein is admitted to practice in Pennsylvania (admitted 1990).

Celeste Reim is a graduate of Temple University (B.A. 1999) and the New England

School of Law (J.D. 2004). Ms. Reim is admitted to practice in Hawaii (admitted 2004), California (admitted 2005) and Pennsylvania (admitted 2012).



# **EXHIBIT 2**



# **EXHIBIT 3**

In re Cathode Ray Tube (CRT) Antitrust Litigation  
Edelson & Associates, LLC  
Reported Expenses Incurred on Behalf of DPPs

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Court Fees (filing, etc.)	
Experts/Consultants	
Federal Express	\$16.90
Transcripts (Hearing, Deposition, etc.)	
Computer Research	
Messenger Delivery	
Photocopies – In House	
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	\$3,130.56
Assessment	
<b>TOTAL:</b>	<b>\$3,147.46</b>