

Exhibit 4

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25 *Direct Purchaser Classes*

26 IN THE UNITED STATES DISTRICT COURT
27 FOR THE NORTHERN DISTRICT OF CALIFORNIA
28 SAN FRANCISCO DIVISION

29 *IN RE HIV ANTITRUST LITIGATION*

Case No. 3:19-cv-02573-EMC (lead case)

30 This Document Relates to:
31 *KPH Healthcare Services, Inc. v. Gilead*
32 *Sciences, Inc. et al.*, 3:20-cv-06961-EMC

**DECLARATION OF MICHAEL D.
HAUSFELD IN SUPPORT OF DIRECT
PURCHASER CLASS PLAINTIFFS'
MOTION FOR AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF COSTS AND
EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARD**

Judge: Honorable Edward M. Chen

1 I, Michael D. Hausfeld, declare as follows:

2 1. I am a member of the bars of the State of New York and the District of Columbia
3 and Chair Emeritus of the law firm Hausfeld LLP. As Trial Counsel for the Direct Purchaser
4 Classes (“DPPs”), I was actively involved in and oversaw Hausfeld LLP’s participation in this
5 litigation. Hausfeld LLP’s firm resume is attached as Exhibit 1.

6 2. I submit this declaration in support of Direct Purchaser Class Plaintiffs’ Motion for
7 Award of Attorneys’ Fees, Reimbursement of Costs and Expenses, and Representative Plaintiffs
8 Service Award (“Fee Petition”).

9 3. Hausfeld LLP prosecuted this case on a contingent-fee basis with no guarantee of
10 recovery. Hausfeld LLP’s involvement in this case was extensive. The Hausfeld firm was brought
11 in by lead counsel for the Direct Purchaser Plaintiffs (“DPPs”) to assist in pretrial matters in this
12 case and to try it before the jury on behalf of the DPP Class.

13 4. With respect to my own role in this case, I familiarized myself with the record in
14 preparation for trial, defended the experts Daniel Rubinfeld and Russell Lamb in multiple
15 depositions, attended most of the court hearings leading up to trial, worked on trial strategy with
16 counsel for other groups, closely advised co-leads for the DPP Class, reviewed and had input on
17 proposed jury instructions, participated in multiple mediations (including ones that occurred after
18 settlement), and worked closely with DPP Class Counsel in devising a trial strategy.

19 5. Michael Lehmann was the principal attorney from the Hausfeld firm working on
20 this case. Given Hausfeld’s anticipated role as trial counsel and the fact that it joined the case early
21 in 2022, he read nearly all of the key depositions in this case and the exhibits used in them, read
22 most of the evidence summaries prepared in this case and the documents cited in them, and read
23 the Court’s prior opinions and orders. When the Teva documents were produced, he examined them
24 as part of the trial preparation. He attended nearly all of the court hearings leading up to trial. He
25 attended several expert depositions in preparation for various experts. He drafted or co-drafted
26 numerous briefs, including class certification filings, *in limine* motions, and other pleadings, and
27 reviewed and often provided edits on numerous other pretrial filings. He was among those who
28 participated in multiple jury focus group sessions and a two-day mock trial on behalf of the DPP

1 Class. He also participated in mediation sessions that ultimately led to the DPP Class settlement.
2 He further participated in the mediation involving the set-aside motion by the End Party Payer
3 Class.

4 6. Christopher Lebsack was brought in for the purpose of participating in the
5 aforementioned two-day mock jury trial.

6 7. Timothy Kearns, another lawyer in the Hausfeld firm with trial experience, was
7 brought in to participate in witness examinations at trial. He also assisted in the aforementioned
8 mock trial, participated in mediation, assisted in review of proposed jury instructions, and served
9 on various trial issue and examination preparation committees.

10 8. Seth Gassman worked on the case up to the end of 2022 and participated in various
11 depositions and deposition preparations, as well as serving on various trial issue committees.

12 9. Bonny Sweeney worked on this case up to the end of July 2022 and participated in
13 various telephone conferences and meetings, as well as reviewing various documents, discovery
14 and pleadings related to experts and issues in the case.

15 10. Brent Landau worked with plaintiffs' economic experts regarding their reports and
16 depositions and liaised with the escrow agent for the Gilead settlement.

17 11. Hazel Berkoh was the chief paralegal on this case, her responsibilities was to oversee
18 all tasks, including reviewing, preparing, and organizing various documents and pleadings; as well
19 as cite check, fact check, proof and preparation of legal memoranda and preparation of trial.

20 12. Elliot Robinson was another paralegal brought in to attend the trial and assist me in
21 my tasks.

22 13. The Hausfeld firm eliminated other timekeepers who billed less than \$20,000.00 in
23 this case.

24 14. From inception to October 31, 2023, Hausfeld LLP spent 5,535.10 hours advancing
25 the litigation. The total lodestar for Hausfeld LLP is \$6,341,913.50. The summary below includes
26 the name, position, years of experience, current hourly rate, time expended, and total lodestar of
27 each person from Hausfeld LLP who worked on the litigation. The hourly rates shown are the
28 current usual and customary rates set by Hausfeld LLP. The information in this declaration

1 regarding the time Hausfeld LLP attorneys and other professionals spent advancing the litigation
 2 was prepared from contemporaneous, daily time records maintained by the firm's timekeeping
 3 software and submitted to, reviewed by, and approved by Co-Lead Class Counsel.

Name	Position	Years of Experience	Hourly Rate	Hours Expended	Lodestar
Berkoh, Hazel	Paralegal	20 Years	\$350.00	914.90	\$320,215.00
Gassman, Seth	Of Counsel	20 Years	\$935.00	232.50	\$217,387.50
Hausfeld, Michael	Partner	54 Years	\$1,550.00	1,501.70	\$2,327,635.00
Kearns, Timothy	Partner	17 Years	\$920.00	435.10	\$400,292.00
Landau, Brent	Partner	22 Years	\$995.00	49.80	\$49,551.00
Lebsock, Christopher	Partner	27 Years	\$1,100.00	137.50	\$151,250.00
Lehmann, Michael	Partner	46 Years	\$1,370.00	1,979.90	\$2,712,463.00
Robinson, Elliot	Paralegal	14 Years	\$350.00	214.70	\$75,145.00
Sweeney, Bonny	Partner	35 Years	\$1,275.00	69.00	\$87,975.00
Total				5,535.10	\$6,341,913.50

12 15. Pursuant to the instruction of Co-Lead Class Counsel, the above summary does not
 13 include time spent administering the BMS Settlement or working on the DPPs' Fee Petition. A
 14 summary including each timekeeper's name, position, current billing rate, and total lodestar broken
 15 down by activity codes is attached as Exhibit 2.

16 16. Hausfeld LLP incurred \$794,322.59 in unreimbursed out-of-pocket costs and
 17 litigation expenses in relation to the litigation. The summary below includes an itemized description
 18 of the costs and litigation expenses incurred by my firm. These costs and litigation expenses were
 19 necessary for the efficient and effective prosecution of the litigation and submitted to and approved
 20 by Co-Lead Class Counsel. The costs and litigation expenses records were prepared from receipts,
 21 expense vouchers, check records, and other documents and are an accurate record of the costs and
 22 litigation expenses. The costs and litigation expenses are all of a type that, in my view, would
 23 normally be charged to a fee-paying client in the private legal marketplace.

Description	Amount
Travel (airfare, ground transportation, parking, etc.)	\$28,263.91
Hotels	\$23,762.59
Meals (during travel)	\$1,695.14
Electronic Research	\$3,333.17
Transcripts and Deposition Costs	

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Service of Process	
Telephone/Teleconference	
Court Fees	\$709.63
Postage/FedEx	
Photocopies	\$2,336.72
Litigation Fund Contributions	\$1,224,938.42
Miscellaneous Costs	\$6,533.01
BMS Settlement Reimbursement	(\$497,250.00)
Total Unreimbursed Costs and Expenses	\$794,322.59

17. As the summary shows, Hausfeld LLP made \$1,224,938.42 in litigation fund contributions to cover shared litigation expenses, such as experts’ fees and deposition costs. Hausfeld LLP was reimbursed \$497,250.00 in connection with the BMS Settlement.

I declare under penalty of perjury that the foregoing is true and correct. Executed this Monday, November 20, 2023, at Washington, D.C.

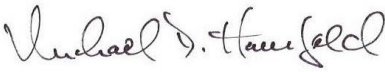

 Michael D. Hausfeld

EXHIBIT 1

HAUSFELD FIRM RESUME

www.hausfeld.com



About Hausfeld

In the last decade, Hausfeld attorneys have won landmark trials, negotiated complex settlements among dozens of defendants, and recovered billions of dollars for clients both in and out of court. Renowned for skillful prosecution and resolution of complex and class-action litigation, Hausfeld is the only claimants' firm to be ranked in the top tier of private enforcement of antitrust/competition law in both the United States and the United Kingdom by *The Legal 500* and *Chambers and Partners*. Our German office is also ranked by *The Legal 500* for general competition law.

From our locations in Washington, D.C., Boston, New York, Philadelphia, San Francisco, Amsterdam, Berlin, Brussels, Düsseldorf, Stockholm, and London, Hausfeld contributes to the development of law in the United States and abroad in the areas of Antitrust/Competition, Commercial and Financial Disputes, Environmental and Product Liability, Human Rights, and Technology and Data Breach. Hausfeld attorneys have studied the global integration of markets—and responded with innovative legal theories and a creative approach to claims in developed and emerging markets.

Hausfeld was founded by Michael D. Hausfeld, who is widely recognized as one of the country's top civil litigators and a leading expert in the fields of private antitrust/competition enforcement and international human rights. *The New York Times* has described Mr. Hausfeld as one of the nation's "most prominent antitrust lawyers," while *Washingtonian* characterizes him as a lawyer who is "determined to change the world—and succeeding," noting that he "consistently brings in the biggest judgments in the history of law."

Antitrust and competition litigation

Hausfeld's reputation for leading groundbreaking antitrust class actions in the United States is well-earned. Having helmed more than 40 antitrust class actions, Hausfeld attorneys are prepared to **litigate and manage cases with dozens of defendants** (*In re Blue Cross Blue Shield Antitrust Litigation*, with more than thirty defendants), **negotiate favorable settlements for class members and clients** (*In re Air Cargo Shipping Services Antitrust Litigation*, settlements of more than \$1.2 billion, and *In re Blue Cross Blue Shield Antitrust Litigation*, \$2.67 billion settlement), **take on the financial services industry** (*In re Foreign Exchange Antitrust Litigation*, with settlements of more than \$2.3 billion), take cartelists to trial (*In re Vitamin C Antitrust Litigation*, trial victory of \$162 million against Chinese manufacturers of Vitamin C), and **push legal boundaries where others have not** (*O'Bannon v. NCAA*, another trial victory in which the court found that NCAA rules prohibiting additional scholarship payments to players as part of the recruiting process are unlawful).



Hausfeld is 'the world's leading antitrust litigation firm.'

Politico

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Hausfeld: a global reach

Hausfeld's international reach enables it to advise across multiple jurisdictions and pursue claims on behalf of clients worldwide. Hausfeld works closely with clients to deliver outstanding results while always addressing their business concerns. Hausfeld does so by anticipating issues, considering innovative strategies, and maximizing the outcome of legal disputes in a way that creates shareholder value. The firm's innovative cross border solutions work to the benefit of the multinational companies it often represents.

Creative solutions to complex legal challenges

Hausfeld lawyers consistently apply forward-thinking ideas and creative solutions to the most vexing global legal challenges faced by clients. As a result, the firm's litigators have developed numerous innovative legal theories that have expanded the quality and availability of legal recourse for claimants around the globe that have a right to seek recovery. Hausfeld's impact was recognized by the *Financial Times*, which honored Hausfeld's European team with the "Innovation in Legal Expertise - Dispute Resolution," award, which was followed up by FT commending Hausfeld's North American team for its innovative work in the same category. In addition, *The Legal 500* has ranked Hausfeld as the only top tier claimants firm in private enforcement of antitrust/competition law in both the United States and the United Kingdom. For example, the landmark settlement that Hausfeld negotiated to resolve claims against Parker ITR for antitrust overcharges on marine hoses was the first private resolution of a company's global cartel liability without any arbitration, mediation, or litigation—creating opportunities never before possible for dispute resolution and providing a new model for global cartel settlements going forward.

Unmatched global resources

The firm combines its U.S. offices on both coasts and vibrant European presence with a broad and deep network around the globe to offer clients the ability to seek redress or confront disputes in every corner of the world and across every industry. With over 160 lawyers in offices in Washington, D.C., Boston, New York, Philadelphia, San Francisco, Amsterdam, Berlin, Düsseldorf, Brussels, Stockholm, and London, Hausfeld is a "market leader for claimant-side competition litigation" (*The Legal 500*).



A prominent litigation firm, renowned for its abilities representing plaintiffs in multidistrict class action antitrust suits across the country involving a wide variety of antitrust issues including monopolization, price manipulation and price fixing.

Chambers and Partners



Hausfeld, which 'commits extensive resources to the most difficult cases,' widely hails as one of the few market-leading plaintiff firms.

The Legal 500



Primarily in the antitrust capacity, Hausfeld is an undisputed trailblazer, identified as a ubiquitous presence by peers on both the plaintiff and defense sides of the 'V'.

Benchmark Litigation

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Antitrust Litigation

Hausfeld's antitrust litigation experience is unparalleled

Few, if any, U.S. law firms are litigating more class actions on behalf of companies and individuals injured by anticompetitive conduct than Hausfeld. The firm has litigated cases involving price-fixing, price manipulation, monopolization, tying, and bundling, through individual and class representation, and has experience across a wide variety of industries, including automotive, aviation, energy, financial services, food & beverage, healthcare, manufacturing, retail, and the transportation and logistics sectors. Clients rely on us for our antitrust expertise and our history of success in the courtroom, and at the negotiation table; the firm does not shy away from challenges, taking on some of the most storied institutions.



Hausfeld, 'one of the most capable plaintiffs' firms involved in the area of civil cartel enforcement,' is [w]idely recognized as a market leader for claimant-side competition litigation... [It is the] market leader in terms of quantity of cases, and also the most advanced in terms of tactical thinking.

The Legal 500

Hausfeld is not only trusted by its clients but also by judges to pursue these claims, as evidenced by the fact that the firm has been appointed as lead or co-lead counsel in dozens of antitrust cases in the last decade. In one example, Judge Morrison C. England of the Eastern District of California praised Hausfeld for having “the breadth of experience, resources and talent necessary to navigate” cases of import.

Recognizing the firm's antitrust prowess, *Global Competition Review* has opined that Hausfeld is “one of—if not the— top Plaintiffs' antitrust firm in the U.S.” *The Legal 500* and

Chambers and Partners likewise consistently rank Hausfeld among the top five firms in the United States for antitrust litigation on behalf of plaintiffs.

Hausfeld has achieved outstanding results in antitrust cases

Hausfeld lawyers have achieved precedent-setting legal decisions and historic trial victories, negotiated some of the world's most complex settlement agreements, and have collectively recovered billions of dollars in settlement and judgments in antitrust cases. Key highlights include:

- ***In re Foreign Exchange Benchmark Rates Antitrust Litig., 13-cv-7789 (S.D.N.Y.)***
Hausfeld served as co-lead counsel in this case alleging financial institutions participated in a conspiracy to manipulate a key benchmark in the foreign exchange market. To date, the firm has obtained over **\$2.3 billion** in settlements from **fifteen defendants**.
- ***In re LIBOR-Based Financial Instruments Antitrust Litig., No. 11-md-2262 (S.D.N.Y.)***
Hausfeld serves as co-lead counsel in this case against sixteen of the world's largest financial institutions for conspiring to fix LIBOR, the primary benchmark for short-term interest rates. To date, the firm has obtained **\$590 million** in settlements with four defendants. An antitrust class has been certified and the case is ongoing against the remaining defendants.
- ***In re Blue Cross Blue Shield Antitrust Litig., No. 13-mdl-2496 (N.D. Ala.)***
The Court appointed Hausfeld attorneys as co-lead counsel, and to the Plaintiffs' Steering Committee, in this case against Blue Cross Blue Shield entities. This case was brought against over 30 Blue Cross companies and its trade association (BCBSA), and alleges that they illegally agreed not to compete with each other for health insurance subscribers across the United States. After defeating motions to dismiss, Hausfeld marshalled evidence from a record that consisted of over **14 million documents** from more than thirty defendants and won a landmark ruling when the district court ruled that the *per se* standard would be applied to defendants' conduct. In August 2022, the Court granted approval to the proposed

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settlement agreement resolving the claims of Blue Cross Blue Shield subscribers for **\$2.67 billion**. In addition to monetary relief, the settlement includes systemic injunctive relief that will change the landscape for competition in healthcare. The settlement (pending an appeal) is the largest antitrust settlement in a case where the government had not itself prosecuted, investigated, or been part of the case at all.

- ***O'Bannon v. NCAA, No. 09-cv-03329 (N.D. Cal.)***

In the landmark O'Bannon litigation, Hausfeld represented college athletes who collectively alleged that the NCAA, its members, and its commercial partners, violated federal antitrust law by unlawfully foreclosing former players from receiving any compensation related to the use of their names, images, and likenesses in television broadcasts, rebroadcasts, and videogames. In 2013, the plaintiffs announced a **\$40 million settlement** agreement with defendant Electronic Arts, Inc., which left the NCAA as the remaining defendant. Following trial in 2014, the Court determined that the NCAA had violated the antitrust laws and issued a permanent injunction. The Ninth Circuit affirmed the NCAA's violation of the antitrust laws and upheld significant injunctive relief—the practical effect of which is that college athletes can now each receive up to \$5,000 more every year as part of their scholarship package (to cover their education, travel and medical expenses, and acquire pre-professional training as they enter the work force).

- ***In re Vitamin C Antitrust Litig., No. 06-md-01738 (E.D.N.Y.)***

Hausfeld serves as co-lead counsel in the first class antitrust case in the United States against Chinese manufacturers. Hausfeld obtained settlements for the class of **\$22.5 million from two of the defendants**—the first after summary judgment, and the second just before closing arguments at trial. Days later, the jury reached a verdict against the remaining defendants, and the court entered a judgment for **\$148 million** after trebling the damages awarded. On appeal to the U.S. Supreme Court, our clients prevailed, and the case was remanded for further consideration by the Second Circuit.

- ***In re Dental Supplies Antitrust Litig., No. 1:16-cv-00696 (E.D.N.Y.)***

Hausfeld served as co-lead counsel in this litigation in which a proposed class of private dental practices claimed that the four major distributors of dental products and equipment conspired to fix margins, divide markets and allocate customers, and orchestrate industry boycotts of lower-priced, innovative rivals. The Federal Trade Commission filed a related lawsuit against the dental distributor companies a year after the private plaintiffs first initiated their action, borrowing legal theories first investigated and advanced by the private plaintiffs. In 2019 the private plaintiffs' action was settled just minutes before a class certification Daubert hearing was set to commence for **\$80 million**.

- ***In re International Air Passenger Surcharge Antitrust Litig., No. 06-md-01793 (N.D. Cal.)***

Hausfeld served as co-lead counsel in this case against two international airlines alleged to have fixed fuel surcharges on flights between the United States and United Kingdom. Lawyers at the firm negotiated a ground-breaking **\$200 million** international settlement that provides recovery for both U.S. purchasers under U.S. antitrust laws and U.K. purchasers under U.K. competition laws.

- ***In re Municipal Derivatives Antitrust Litig., No. 08-cv-2516 (S.D.N.Y.)***

Hausfeld served as co-lead counsel in this case against banks, insurance companies, and brokers accused of rigging bids on derivative instruments purchased by municipalities. The firm obtained over **\$200 million** in settlements with more than ten defendants.

- ***In re Automotive Aftermarket Lighting Products Antitrust Litig., No. 09-ML-2007 (C.D. Cal.)***

Hausfeld served as co-lead counsel in this case against three manufacturers for participating in an international conspiracy to fix the prices of aftermarket automotive lighting products. The firm obtained over **\$50 million** in settlements.

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- ***In re Processed Egg Products Antitrust Litig., No. 08-cv-04653 (E.D. Pa.)***

Hausfeld served as co-lead counsel in this case alleging that egg producers, through their trade associations, engaged in a scheme to artificially inflate egg prices by agreeing to restrict the supply of both laying hens and eggs. The firm obtained over **\$135 million** in settlements, won certification of a class of shell egg purchasers, and tried the case against the remaining defendants.

- ***In re Domestic Airline Travel Antitrust Litig., No. 15-1404 (CKK) (D.D.C.)***

Hausfeld serves as co-lead counsel for a proposed class of domestic air passengers that collectively allege the defendants, the four major U.S. passenger air carriers — United, American, Delta, and Southwest — conspired to fix domestic airfares by colluding to limit their respective capacity. The passengers allege that Defendants, in which a common set of investors owned significant shares during the conspiracy period, carried out the conspiracy through repeated assurances to each other on earnings calls and other statements that they each were engaging in “capacity discipline”. In October 2016, the court denied defendants’ motion to dismiss. Since that time, the firm has obtained **\$60 million** in settlements with American and Southwest. The litigation against United and Delta is ongoing.

Litigation achievements

Significant trial victories

While many law firms like to talk about litigation experience, Hausfeld lawyers regularly bring cases to trial—and win. Among our trial victories are some of the largest antitrust cases in the modern era. For example, in ***O’Bannon v. NCAA (N.D. Cal.)***, we conducted a three-week bench trial before the chief judge of the Northern District of California, resulting in a complete victory for college athletes who alleged an illegal agreement among the National Collegiate Athletic Association and its member schools to deny payment to athletes for the commercial licensing of their names, images, and likenesses. Our victory in the O’Bannon litigation followed the successful trial efforts in ***Law v. NCAA (D. Kan.)***, a case challenging earning restrictions imposed on

assistant college coaches in which the jury awarded **\$67 million** to the class plaintiffs that one of our lawyers represented.

In ***In re Vitamin C Antitrust Litigation (E.D.N.Y.)***, we obtained, on behalf of our direct purchaser clients, a **\$148 million** jury verdict and judgment against Chinese pharmaceutical companies that fixed prices and controlled export output of Vitamin C—on the heels of \$22.5 million in settlements with other defendants, which represented the first civil settlements with Chinese companies in a U.S. antitrust cartel case. Years earlier, we took on a global vitamin price-fixing cartel in ***In re Vitamins (D.D.C.)***, in which we secured a **\$1.1 billion settlement** for a class of vitamin purchasers and then took the remaining defendants to trial, culminating in a **\$148 million jury verdict**.

Our trial experience extends to intellectual property matters and general commercial litigation as well. Recently, we represented entertainment companies that sought to hold internet service provider Cox Communications accountable for willful contributory copyright infringement by ignoring the illegal downloading activity of its users. Following a trial in ***BMG Rights Management (US) LLC, v. Cox Enterprises, Inc. (E.D. Va.)***, the jury returned a **\$25 million verdict** for our client. After the defendants appealed and prior to a new trial, the parties settled.

Exceptional settlement results

Over the past decade, Hausfeld has recouped over \$20 billion for clients and the classes they represented. We are proud of our record of successful dispute resolution. Among our settlement achievements, a selection of cases merit special mention.

On August 9, 2022, the Court granted approval to the proposed settlement agreement in ***In re Blue Cross Blue Shield Antitrust Litigation (M.D. Ala.)***, resolving the claims of Blue Cross Blue Shield subscribers represented by Hausfeld for **\$2.67 billion**. In addition to monetary relief, the settlement includes systemic injunctive relief that will change the landscape for competition in healthcare.

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In the high profile *In re Foreign Exchange Benchmark Rates Antitrust Litigation* (S.D.N.Y.), we negotiated settlements totaling more than \$2.3 billion with fifteen banks accused of conspiring to manipulate prices paid in the foreign-exchange market. In another case involving allegations of pricefixing among the world's largest airfreight carriers, *In re Air Cargo Shipping Services Antitrust Litigation* (E.D.N.Y.), we negotiated settlements with more than 30 defendants totaling over \$1.2 billion—all in advance of trial. In the ongoing *In re LIBOR-Based Financial Instruments Antitrust Litigation* (S.D.N.Y.) case, we have secured settlements to date totaling \$590 million with Barclays (\$120 million), Citi (\$130 million), Deutsche Bank (\$240 million), and HSBC (\$100 million). The court has granted final approval to each of these settlements.

Hausfeld served as class counsel in *Hale v. State Farm Mutual Automobile Insurance Co.* (S.D.Ill.). This case involved allegations that State Farm worked to help elect an Illinois state supreme court justice in order to overturn a billion-dollar judgment against it. On the day opening statements were to be delivered to the jury, State Farm agreed to settle for **\$250 million**. Finally, in the global Marine Hose matter, we broke new ground with the first private resolution of a company's global cartel liability without any arbitration, mediation, or litigation. That settlement enabled every one of Parker ITR's non-US marine-hose purchasers to recover up to 16% of their total purchases.

As co-lead counsel for a class of app developers in *In re Google Play Store Antitrust Litigation* (N.D. Cal.), on November 18, 2022, Hausfeld secured preliminary approval for a **\$90 million** settlement in groundbreaking antitrust class action against Google. The settlement resolves claims against Google regarding its alleged anticompetitive conduct and unlawful practices related to the Google Play Store, including Google's requirement that app developers pay a 30% fee to Google on revenue earned from paid apps and in-app products. The settlement was reached on behalf of app developers with \$2 million or less in annual sales, which includes nearly all U.S. developers earning revenue in the Google Play Store. In addition to paying \$90 million in monetary relief directly to developers, Google has

acknowledged that the litigation was a catalyst for its 2021 launch of a program where developers pay a reduced 15% service fee on their first \$1 million in annual revenues and agreed to maintain that reduced fee tier for at least three more years. Google has also committed to a series of structural reforms, including developing an "Indie Apps Corner" on the homepage of the Google Play Store and publishing an annual transparency report.

In the *In re Disposable Contact Lens Antitrust Litigation* case, Hausfeld serves as one of the three co-lead counsel for a nationwide class of consumers alleging horizontal and vertical conspiracies by the four leading contact lens manufacturers and their primary distributor to impose minimum resale price maintenance policies called "unilateral pricing policies," or "UPPs." case. On June 16, 2016, the court overseeing the litigation denied the defendants' motion to dismiss; on December 4, 2018, the court certified litigation classes of consumers who purchased contact lenses subject to UPPs; and on November 27, 2019, the Court denied the defendants' four motions for summary judgment. The plaintiffs have prevailed at every turn. On June 16, 2016, the court denied the defendants' motion to dismiss, on December 4, 2018, the court granted class certification, and on November 27, 2019, the court denied the defendants' motions for summary judgment. Settlements were reached with all five defendants prior to the scheduled trial in March 2022, totaling **over \$117 million**: CVI (\$2 million), B&L (\$10 million), ABB (\$30.2 million), Alcon (\$20 million) and JJVC (\$55 million).

These cases are just a few among dozens of landmark settlements across our practice areas.

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Reputation and leadership in the antitrust bar

Court commendations

Judges across the country have taken note of Hausfeld's experience and results achieved in antitrust litigation.



This has just been an absolute gem of an experience from the standpoint of having the opportunity to have just great lawyers fighting over something that's really important and significant.

– District Judge R. David Proctor

In re Blue Cross Blue Shield Antitrust Litigation, MDL No. 2406 (N.D. Ala.) (granting preliminary approval of settlement in case where Hausfeld serves as co-lead counsel.)



All class actions generally are more complex than routine actions... But this one is a doozy. This case is now, I guess, nearly more than ten years old. The discovery as I've noted has been extensive. The motion practice has been extraordinary... The recovery by the class is itself extraordinary. The case, the international aspect of the case is extraordinary. Chasing around the world after all these airlines is an undertaking that took enormous courage.

– Judge Brian M. Cogan

In re Air Cargo Shipping Services Antitrust Litigation, No. 06-md-1775 (E.D.N.Y.)



Comparing Hausfeld's work through trial to *Game of Thrones*: 'where individuals with seemingly long odds overcome unthinkable challenges... For plaintiffs, their trial victory in this adventurous, risky suit, while more than a mere game, is nothing less than a win...'

– Magistrate Judge Nathanael M. Cousins

O'Bannon v. Nat'l College Athletic Ass'n, No. 09-cv-3329 (N.D. Cal.)



Hausfeld lawyers achieved 'really, an outstanding settlement in which a group of lawyers from two firms coordinated the work... and brought an enormous expertise and then experience in dealing with the case.' Hausfeld lawyers are 'more than competent. They are outstanding.'

– Judge Charles R. Breyer

In re International Air Passenger Surcharge Antitrust Litig., No. 06-md-01793 (N.D. Cal.) (approving a ground-breaking \$200 million international settlement that provided recovery for both U.S. purchasers under U.S. antitrust laws, and U.K. purchasers under U.K. competition laws.)



Hausfeld has 'the breadth of experience, resources and talent necessary to navigate a case of this import.' Hausfeld 'stands out from the rest.'

– District Judge Morrison C. England Jr.

Four In One v. SK Foods, No. 08-cv-3017 (E.D. Cal.)



The class is represented by what I would describe as an all-star group of litigators...

– District Judge David R. Herdon

Hale v. State Farm, No. 12-cv-00660-DRH-SCW (S.D. Ill.)

HAUSFELD

FOR THE CHALLENGE

Awards and recognitions



The Legal 500

In 2022, for the 13th consecutive year, Hausfeld was ranked in the top tier nationally for firms in antitrust civil litigation and class actions by *The Legal 500*. The publication has described Hausfeld lawyers as “top-notch in all respects and particularly expert in everything about antitrust law.” The publication also previously stated that:

Hausfeld lawyers are, “pragmatic, smart and focused litigation experts,” and the firm is “at the top of its game,” with “a number of heavyweight practitioners.”

“DC firm Hausfeld LLP remains top-notch in antitrust litigation... Hausfeld LLP is one of the most capable plaintiffs firms involved in the area of civil cartel enforcement, and is handling some of the major cartel-related cases...”

Hausfeld is a “market transformer,” the “most innovative firm with respect to antitrust damages,” is “[d]riven by excellence,” “anticipates the evolving needs of clients,” and delivers “outstanding advice not only in legal terms but also with a true entrepreneurial touch. . .”

Described by a client as ‘very tenacious and appropriately aggressive, with great client relations skills’, Hausfeld LLP enjoys a stellar reputation in the antitrust space and is regularly praised for its European and global plaintiff-side antitrust practice alongside its work in the US.

Concurrences



In 2020, the Hausfeld *Competition Bulletin* article titled, “Data Exploiting as an Abuse of Dominance: The German Facebook Decision,” authored by Hausfeld lawyer Thomas Höppner, was awarded *Concurrences*’ 2020 Writing Award in its Unilateral Conduct (Business) category.

In 2018, an article authored by Hausfeld lawyer Scott Martin, joined by co-authors Brian Henry and Michaela Spero, was awarded *Concurrences*’ 2018 Writing Award for Private Enforcement (Business) Category. The article, “Cartel Damage Recovery: A Roadmap for In-House Counsel,” was originally published in *Antitrust Magazine*.

In 2017, Hausfeld’s *Competition Bulletin* was selected to be ranked among the top antitrust firms distributing newsletters and bulletins. Hausfeld is the only Plaintiffs’ firm to be ranked, and we secured the number one spot for Private Enforcement Newsletters.

In 2015, Hausfeld Partners Michael Hausfeld, Michael Lehmann and Sathya Gosselin won the *Concurrences*’ 2015 Antitrust Writing Awards in the Private Enforcement (Academic) category for their article, “Antitrust Class Proceedings—Then and Now,” *Research in Law and Economics*, Vol. 26, 2014.

HAUSFELD

FOR THE CHALLENGE



Benchmark Litigation

In 2022, for the fourth consecutive year, *Benchmark Litigation* highlighted Hausfeld as a leader in the domain of dispute resolution, recognizing the firm at the national level, as well as regionally on both coasts.

Hausfeld was ranked by *Benchmark* for Antitrust/Competition Nationwide, and is one of only a small handful of plaintiff-side firms on the list. Hausfeld was also honored as a 'Recommended Top Plaintiff Firm' Nationwide, and described by the publication as "an undisputed trailblazer, identified as a ubiquitous presence by peers on both the plaintiff and defense sides of the 'V.'" A peer on the defense side commented "many firms try to do what they do, but Hausfeld is one of the only ones that gets it right and one of the ones we take the most seriously." Further to Hausfeld's national recognitions, *Benchmark* recognized several individuals in the firm's San Francisco and Washington, DC offices.

2022 Antitrust Report

In 2022, for a fourth consecutive year, Hausfeld has been recognized as one of the leading claimant firms for recovery in antitrust litigation in the US. In the *2021 Antitrust Annual Report*, published by the Center for Litigation and Courts | UC Hastings Law and The Huntington National Bank, Hausfeld is listed as the top firm out of the 25 analyzed, having achieved an aggregate settlement recovery totaling over \$5.27 billion over 13 years from 2009-2021. Hausfeld also ranked first among lead counsel in relation to the number of complaints filed in US federal courts (Hausfeld was responsible for 296 filings between 2009 and 2021) and first among lead counsel in the total amounts recovered for class members (Hausfeld recovered 114 settlements for its clients between 2009 and 2021 totaling over \$5.27 billion).



Who's Who Legal

In 2022, *Who's Who Legal* honored 14 Hausfeld partners - more than any other firm - among the world's top 106 competition claimant lawyers. These practitioners are renowned for their experience and expertise in competition or antitrust matters before the highest courts in the UK, EU and USA.

In 2019, *Who's Who Legal* honored Hausfeld as the 'Competition Plaintiff Firm of the Year,' noting that the firm is, "a giant in the competition plaintiff field that once again demonstrates the strength and depth of its expertise..."

In 2018, the publication recognized the firm as "[a] powerhouse in the plaintiffs' litigation field, with particularly deep capability in competition matters," highlighting "nine outstanding litigators."



HAUSFELD

FOR THE CHALLENGE



Financial Times

In 2019, the *Financial Times* named Hausfeld one of the 25 'Most Innovative Law Firms: Overall' in North America. Notably, Hausfeld was the only plaintiffs' firm to make the list. In 2018, the *Financial Times*' Innovative Lawyers Report honored Hausfeld with the 'Innovation in Legal Expertise - Dispute Resolution' award for the firm's work with Dutch transportation insurer TVM. The *Financial Times* followed up this award by commending Hausfeld in its 2018 North America Innovative Lawyers Report for its representation of plaintiffs in *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*. Hausfeld is proud to be the only plaintiffs' firm to have received recognition in the category of 'dispute resolution' for 2018 on both sides of the Atlantic.

In 2016, the *Financial Times* named Hausfeld as a top innovative law firm. Writing about Hausfeld's innovation in the legal market, the *Financial Times* noted: "The firm has taken the litigation finance model to Germany, to turn company inhouse legal departments into profit centres."

In 2015, Michael Hausfeld was recognized by the *Financial Times* as one of the Top 10 Innovative Lawyers in North America.

In 2013, Hausfeld won the *Financial Times* Innovative Lawyer Dispute Resolution Award. The FT stated that Hausfeld has "[p]ioneered a unique and market-changing litigation funding structure that improved accessibility and enabled victims to pursue actions with little or no risk."



U.S. News & World Report & Best Lawyers

In 2022, Hausfeld was the only firm awarded the honor of best law firm in the 'Antitrust Law' category by *U.S. News and Best Lawyers* in its 2023 Best Law Firms edition.

In 2021, Hausfeld was the only firm awarded the honor of best law firm in the 'Litigation – Antitrust' category by *U.S. News and Best Lawyers* in its 2022 Best Law Firms edition.

Global Competition Review



In 2021, the firm won *Global Competition Review's* award for "Litigation of the Year – Cartel Prosecution" in recognition of the firm's work on *In re Blue Cross Blue Shield Antitrust Litigation*. After eight years of litigation, the proposed class of subscribers secured a \$2.67 billion settlement from the Blue Cross Blue Shield (BCBS) network, which was preliminarily approved in 2020 and pending final approval.

In 2018, Hausfeld attorneys were awarded *Global Competition Review's* "Litigation of the Year – Cartel Prosecution" commending its work on *In re Vitamin C Antitrust Litigation*. In this historic case, the Supreme Court ruled in favor of Hausfeld's clients, setting forth criteria and a framework for courts to use when assessing the credibility and weight to give to a foreign government's expression of its own laws.

HAUSFELD

FOR THE CHALLENGE

In 2016, Hausfeld was awarded Global Competition Review's "Litigation of the Year – Cartel Prosecution" for its work on *In re Foreign Exchange Antitrust Benchmark Litigation*. The award recognized Hausfeld's success in the Foreign Exchange litigation to date, which has included securing settlements for more than \$2.3 billion in on behalf of a class of injured foreign exchange investors and overcoming three motions to dismiss in the action.

In 2015, Hausfeld attorneys were awarded Global Competition Review's "Litigation of the Year – Non-Cartel Prosecution," which recognized their trial victory in *O'Bannon v. NCAA*, a landmark case brought on behalf of college athletes challenging the NCAA's restrictions on payment for commercial licensing of those athletes' names, images, and likenesses in various media.



U.S. News & World Report

Since 2016, *U.S. News & World Report – Best Law Firms* has named Hausfeld to its top tier in both Antitrust Law and Litigation, and among its top tiers in Commercial Litigation. Hausfeld is also continuously recognized in New York, San Francisco, and Washington, DC in Antitrust Law, Litigation, Mass Torts and Commercial Litigation.

American Antitrust Institute



In 2021, Hausfeld and its co-counsel received the American Antitrust Institute's award for 'Outstanding Antitrust Litigation Achievement in Private Law Practice' for collective work on behalf of our clients in *In re Blue Cross Blue Shield Antitrust Litigation*.

In 2018, Hausfeld and its co-counsel received the American Antitrust Institute's award for 'Outstanding Antitrust Litigation Achievement in Private Law Practice' for their trial and appellate victories in *In re Vitamin C Antitrust Litigation*.

In 2016, the American Antitrust Institute honored two Hausfeld case teams—*In re Air Cargo Shipping Services Antitrust Litig.* (E.D.N.Y.) and *In re Municipal Derivatives Antitrust Litig.* (S.D.N.Y.)—with its top award for Outstanding Antitrust Litigation Achievement in Private Law Practice. Taken together, these two cases have yielded settlements of over \$1.4 billion to class members after nearly a decade of litigation. The award celebrates private civil actions that provide significant benefits to clients, consumers, or a class and contribute to the positive development of antitrust policy.

In 2015, Hausfeld and fellow trial counsel won the American Antitrust Institute's award for Outstanding Antitrust Litigation Achievement in Private Law Practice for their trial and appellate victories in *O'Bannon v. NCAA*.

HAUSFELD

FOR THE CHALLENGE

Chambers AND PARTNERS

Chambers and Partners

In 2022, *Chambers and Partners* once again named Hausfeld to its highest tier, Band 1, for “Antitrust: Plaintiff – USA – Nationwide,” noting that the firm:

“has fantastic lawyers who are out-of-the-box thinkers, client service-oriented and a pleasure to work with.”

Hausfeld was one of just four law firms ranked in Band 1. Hausfeld’s New York office was also named to Band 1 for “Antitrust: Mainly Plaintiff – New York” and Hausfeld’s California office was named to Band 1 for “Antitrust: Mainly Plaintiff - California.”

The publication has also previously noted about the firm:

“Able to deploy a deep bench of trial attorneys with outstanding litigation experience,” and is “renowned for its abilities representing plaintiffs in multidistrict class action antitrust suits across the country involving a wide variety of antitrust issues.”

Clients reported to the publication that “Hausfeld is a great partner that makes sure to understand our perspective,” and peers have commended the firm’s “terrific, deep bench.”

- A reputation as a “[m]arket-leading plaintiffs’ firm with considerable experience in antitrust class action suits and criminal cartel investigations.”
- “[N]umerous successes in the area, resulting in major recovery or settlements for its clients.”
- Firm Chair Michael Hausfeld’s record as “a very successful and able antitrust litigator,” and “one of the titans of the Plaintiffs Bar.”

Additionally, between 2016 and 2020, *Chambers and Partners UK* ranked Hausfeld in the top tier among London firms representing private claimants in competition matters and recognized the firm’s accomplishments in Banking Litigation.

National Law Journal

In 2015, Hausfeld was named to the *National Law Journal*’s “Plaintiffs Hot List” for the fourth year in a row. The publication elaborated:

“Hausfeld’s creative approaches underpinned key antitrust wins last year, including a trailblazing victory for former college athletes over the use of their likenesses in television broadcasts and video games...” and Hausfeld, along with its co-counsel, “nailed down a \$99.5 million settlement with JPMorgan Chase & Co. in January in New York federal court for alleged manipulation of market benchmarks. And it helped land nearly \$440 million in settlements last year, and more than \$900 million thus far, in multidistrict antitrust litigation against air cargo companies.”

In 2014, the *National Law Journal* named Hausfeld as one of a select group of America’s Elite Trial Lawyers, as determined by “big victories in complex cases that have a wide impact on the law and legal business.” The award notes that Hausfeld is among those “doing the most creative and substantial work on the plaintiffs side.”

THE NATIONAL
LAW JOURNAL

HAUSFELD

FOR THE CHALLENGE

Diversity, equity & inclusion

Hausfeld is committed to diversity and inclusion, because we know that embracing a variety of viewpoints and backgrounds allows us to gain better insights and strengthen our practice. Our diversity is reflected throughout our dozens of case teams leading class actions across the country. Hausfeld is proud that half of our lawyers are women, who lead some of the largest price-fixing and market manipulation antitrust MDLs in the United States on behalf of our firm.

Hausfeld's Appointed Diversity Partner and Diversity, Equity & Inclusion Committee is committed to examining and improving all aspects of our hiring, benefits, training, support, and promotion practices to ensure that Hausfeld maintains the highest standards for ourselves, and continually strive for improvement. Hausfeld seeks to ensure that all of our attorneys are provided the resources they need to excel, and are given opportunities to lead, both within and outside the firm.

At Hausfeld, achieving social justice, diversity, inclusivity, and equity is core to our values. Some examples of how we live out our values, both through our legal work and within the firm internally includes our representation of victims of apartheid in South Africa, black Americans persecuted in the Tulsa race riots and their survivors, and plaintiffs in a racial-bias discrimination case against Texaco, Inc., among other civil rights and pro bono cases. Today, the firm continues to fight for victims of deeply ingrained inequities, including taking on intersectional challenges like climate change litigation and advocacy.

Hausfeld has a strong ethos of providing access to justice for communities across the world. This is evidenced in much of the pro-bono work the firm has undertaken over the years. One of the highest profile recent cases involves our representation of Greta Thunberg and 15 young climate activists from around the world who are threatened by the climate crisis. Represented by a team of human rights and environmental lawyers from Hausfeld, and NGO Earthjustice, the young people submitted a petition to the UN Committee on the Rights of the Child arguing that five G20 countries - Argentina, Brazil, France, Germany, and Turkey - are violating their rights to life, health, and culture under the

Convention on the Rights of the Child by failing to curb greenhouse gas emissions to levels that would limit global warming to 1.5°C, a target set by climate science and the Paris Agreement. Hausfeld lawyers have worked tirelessly for several years in supporting these young people in tackling climate change.

For over a decade, Hausfeld has supported the Mid-Atlantic Innocence Project, which seeks to exonerate innocent convicted individuals, who are disproportionately persons of color. In addition, the firm ran a significant donation and employee matching program for the Equal Justice Initiative, the National Urban League, and the NAACP's Legal Defense and Education Fund, with ultimate donations over \$50,000. The firm has also joined the Law Firm Anti-Racism Alliance (LFAA), a group with the strategic goal of changing the way institutions deal with racial inequality.

Hausfeld achieved Certification Plus in Diversity Lab's Mansfield Rule for Midsize Firms, an innovative national initiative modeled after the original Mansfield Rule, committing the firm to consider an intentionally broad and diverse pool of candidates when selecting leaders for positions within the firm, hiring entry-level and lateral attorneys, positioning lawyers for case leadership roles, and forming teams for client pitches. As a Mansfield Certified Plus firm, Hausfeld also achieved 30 percent or more diverse representation in current leadership roles, formal client pitches, and staffing on key matters. Out of the total 26 firms that participated in this inaugural program, Hausfeld is one of 16 firms that achieved Certified Plus status.

Hausfeld also has a 1L Diversity Fellowship Program in which a 1L law student from a historically underrepresented background participates in the US summer associate program and receives a \$10,000 scholarship toward the student's law school costs.

In addition, our Diversity, Equity & Inclusion Committees continues to facilitate mandatory trainings, including anti-bias and diversity, equity & inclusion training, for all management, attorneys, and staff. Further, the DEI Committee continues to hold numerous all-firm programs, often time with outside experts including historians, NGOs, and DEI professionals, to speak on various social justice topics including Racial Justice, LGBTQ+, Disability Rights, Women's Rights, and Social Inclusion.

HAUSFELD

FOR THE CHALLENGE

Thought leadership

Hausfeld lawyers do more than litigation. They exercise thought leadership in many fields. Hausfeld lawyers host, lecture at, and participate in leading legal conferences worldwide and address ground-breaking topics including: the pursuit of damages actions in the United States and the European Union on behalf of EU and other non-U.S. plaintiffs; nascent private civil enforcement of EU competition laws; application of the Foreign Trade Antitrust Improvements Act; the impact of *Wal-Mart Stores, Inc. v. Dukes and Comcast Corp. v. Behrend* on class certification; reforms to the Federal Civil Rules of Procedure; emerging issues in complex litigation; and legal technology and electronic discovery.

Hausfeld attorneys have presented before Congressional subcommittees, regulators, judges, business leaders, in-house counsel, private lawyers, public-interest advocates, elected officials, and institutional investors, and hold leadership positions in organizations such as the American Bar Association, the American Antitrust Institute, the Women Antitrust Plaintiffs' Attorneys network group, the Sedona Conference, and the Institute for the Advancement of the American Legal System.

Selected articles

- **“Will the FTC resuscitate the Robinson Patman Act in an effort to bring down prescription drug prices?”** Irving Scher, Hausfeld *Competition Bulletin/Lexology* (Spring 2022).
- **“Seventh Circuit reminds practitioners: Article III standing and antitrust standing are distinct,”** Sarah LaFreniere, Hausfeld *Competition Bulletin/Lexology* (Spring 2022).
- **“Court certifies Interchange Fee equitable-relief class despite major retailer opposition,”** Ian Engdahl, Hausfeld *Competition Bulletin/Lexology* (Fall 2021).
- **“Indirect purchaser class actions after the 9th Circuit Stromberg v. Qualcomm decision,”** Kyle Bates & Yelena Dewald, Hausfeld *Competition Bulletin/Lexology* (Fall 2021).
- **“Confusion continues in the antitrust evaluation of Most Favored Nations Provisions,”** Irving Scher, Hausfeld *Competition Bulletin/Lexology* (Spring 2021).
- **“Supreme Court Justices foreshadow a turbulent future for the NCAA,”** Swathi Bojedla & Eduardo Carlo, Hausfeld *Competition Bulletin/Lexology* (Summer 2021).
- **“Can a non-signatory compel arbitration?”** Walter D. Kelley Jr., Hausfeld *Competition Bulletin/Lexology* (Summer 2021).
- **“Briseño v. Henderson: new considerations for class action settlements today,”** Christopher Lebsack & Kyle Bates, Hausfeld *Competition Bulletin/Lexology* (Summer 2021).
- **“Umbrella Liability: Has Its Time Come?”** Michael D. Hausfeld and Irving Scher, *Competition Policy International* (October 24, 2020).
- **“Third Circuit's Suboxone Class Certification Affirmance Clarifies Commonality and Predominance Requirements,”** Swathi Bojedla, Hausfeld *Competition Bulletin/Lexology* (Fall 2020).
- **“Class Actions & Competition Law, An Overview Of EU and National Case Law,”** Michael D. Hausfeld, Anthony Maton, David R. Wingfield, *Concurrences e-Competition Bulletin - Special Issue on Class Actions* (August 27, 2020).
- **“Personal Jurisdiction in Federal Class Actions: Three New Rulings but Little Clarity,”** Sarah LaFreniere, Hausfeld *Competition Bulletin/Lexology* (Spring 2020).
- **“In Defense of Class Actions: A Response to Makan Delrahim's Commentary on the UK Mastercard Case,”** Michael D. Hausfeld, Irving Scher, Laurence T. Sorokin, *Competition Policy International* (June 8, 2020).

HAUSFELD

FOR THE CHALLENGE

- **“Social Media and Antitrust: A Discovery Primer,”** Nathaniel C. Giddings & Aaron Patton, *Antitrust Magazine* (Summer 2018).
- **“The Volkswagen Scandal: Catalyst for Class Action Change?”** Sarah LaFreniere (Co-Author), *Law360* (Feb. 27, 2018).
- **“Litigating Indirect Purchasers Claims: Lessons for the EU from the U.S. Experience,”** Michael D. Hausfeld, Irving Scher, and Laurence Sorkin, *Antitrust Magazine* (Fall 2017).
- **“Cartel Damage Recovery: A Roadmap for In-House Counsel,”** Scott Martin, Michaela Spero, and Brian Henry, *Antitrust Magazine* (Fall 2017)—Recipient of Concurrences’ 2018 Antitrust Writing Award for Private Enforcement (Business) Category.
- **“Oligopoly & No Direct Evidence? Good Luck, Says Third Circuit,”** Christopher Lebsock and Samantha Stein, Hausfeld *Competition Bulletin/Lexology* (Fall 2017).
- **“Damage Class Actions After Comcast: A View from the Plaintiffs’ Side,”** Michael D. Hausfeld and Irving Scher, *Antitrust Magazine* (Spring 2016).
- **“Proving Damages in Consumer Class Actions,”** James J. Pizzirusso, *Consumer Protection Committee, Vol. 22/No. 1*, ABA Section of Antitrust Law (March 2016).
- **“Courts determine that non-cash consideration is subject to antitrust scrutiny under Actavis,”** Jeannine Kenney, Hausfeld *Competition Bulletin/Lexology* (Oct. 2015).
- **“The FTC’s Revised Fred Meyer Guides: Back to the Sixties,”** Irving Scher, *Antitrust Source* (February 2015).
- **“Bundling Claims Under Section 1 of the Sherman Act: Focusing on Firms’ Abilities to Create Anticompetitive Effects in a Market, Rather Than Their Share of It,”** Brent W. Landau and Gary Smith, *Antitrust Health Care Chronicle, Vol. 28/ No. 1*, ABA Section of Antitrust Law (Jan. 2015).
- **“Antitrust Class Proceedings – Then and Now,”** Michael D. Hausfeld, Gordon C. Rausser, Gareth J. Macartney, Michael P. Lehmann, and Sathya S. Gosselin, *Research in Law and Economics (Vol. 26, 2014)*—Recipient of Concurrences’ 2015 Antitrust Writing Award for Private Enforcement (Academic) Category.
- **“Chapter 39: USA,”** Brent W. Landau and Brian A. Ratner, *The International Comparative Legal Guide to Cartels & Leniency Ch. 39* (2014).
- **“Prosecuting Class Actions and Group Litigation – Understanding the Rise of International Class and Collective Action Litigation and How this Leads to Classes that Span International Borders,”** Michael D. Hausfeld and Brian A. Ratner, *World Class Actions Ch. 26* (2012).
- **“Private Enforcement of Antitrust Law in the United States, A Handbook - Chapter 4: Initiation of a Private Claim,”** Michael D. Hausfeld and Brent W. Landau, et al., (2012).
- **“The Novelty of Wal-Mart v. Dukes,”** Brian A. Ratner and Sathya S. Gosselin, American Bar Association, Business Torts & Civil RICO Committee, *Business Torts & RICO News, Vol. 8, Issue 1*, (Fall 2011).

EXHIBIT 2

Hausfeld LLP Activity Billing Code Summary

Activity Codes	
L110 – Factual Investigation / Development L120 – Litigation Strategy and Analysis L130 – Experts / Consultants (Retaining, Communicating with Experts) L160 – Settlement and ADR L190 – Case Management and Administration L210 – Pleadings L240 – Pretrial Motions Dispositive (MTD, MSJ, etc.) L250 – Pretrial Motions Other (CMO, PO, Status Conference, etc.)	L260 – Class Certification and Notice L270 – Pretrial Court Appearances - Attendance L280 - Pretrial Court Appearances – Participation L310 – Written Discovery L320 – Discovery Document Production and Review L330 – Discovery Depositions L340 – Discovery Expert Discovery L350 – Pretrial Motions Discovery L390 – Discovery Other
L410 – Trial Preparation Fact Witnesses L420 – Trial Preparation Expert Witnesses L430 – Trial Preparation Written Motions and Submissions L440 – Other Trial Preparation & Support L450 – Trial Attendance L460 – Trial and Post-Trial Motions and Submissions L510 – Appeals, Motions, Briefs, and Other Submissions L530 – Appeals Oral Argument*	

Name	Title	110	120	130	160	190	210	240	250	260	270	280	310	320	330	340	350	390	410	420	430	440	450	460	510	Total Time	Hourly Rate	Lodestar
Beckeb, Hazel	P				1.20	670.9	32.30			53.80					13.50							120.2			23.00	914.9	\$350	\$320,215.00
Gassman, Seth	OC	31.50	31.70	133.8		3.00	4.30	1.50		3.00	1.20										22.50				232.5	\$935	\$217,387.50	
Hausfeld, Michael	P		72.90	115.0	193.3	1.00	25.00			69.50	31.50	7.00			158.0	27.00	.50			5.00	55.50	650.5		90.00	1,501	\$1,550	\$2,327,635.00	
Kearns, Timothy	P	129.0	94.60	10.10	21.30	36.00					24.80									1.00	3.40	124.9				435.1	\$995	\$400,202.00
Laudin, Brent	P		21.60	13.40	2.30	2.30				70	3.70				5.80							135.6			49.50	\$995	\$49,551.00	
Lesosck, Christopher	P		8.90																			17.60				137.5	\$1,100	\$151,250.00
Lehmann, Michael	P	179.4	9492	157.6	43.80	17.60	278.4	2.60	1.10	96.50	33.50			27.90	148.9	14.80		3.30		7.70		17.60			39	\$1,370	\$2,712,463.00	
Robinson, Elliot	P					16.00															92.00	106.7				214.7	\$350	\$75,145.00
Sweeney, Bohny	P		26.50	30.70	1.30	30	3.50			4.90			.60		.50			.20							69.00	\$1,275	\$87,975.00	
Totals		339.9	1,198	460.6	263.2	737.6	343.5	4.10	1.10	228.4	94.70	7.00	.60	27.90	326.7	41.80	.50	3.50		13.70	58.90	1,163	106.7	113.0	5,535	69,000		\$6,341,913.50

Title Key

- P – Partner
- OC – Of Counsel
- A – Associate
- S – Staff Attorney
- P – Paralegal

* Omitted – No Appellate Oral Argument Occurred in the Litigation