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8 Plaintiffs' Counsel

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA**

11 In Re QUANTCAST ADVERTISING
12 COOKIE LITIGATION, and

No. 2:10-cv-05484-GW-JCG

No. 2:10-cv-05948-GW-JCG

13
14 In Re CLEARSPRING FLASH COOKIE
15 LITIGATION

[Assigned to the Hon. George H. Wu]

16 **DECLARATION OF DAVID C.
17 PARISI IN SUPPORT OF AN
18 AWARD OF FEES AND COSTS**

Date: June 13, 2011

Location: Courtroom 10

312 N. Spring Street

Los Angeles, CA 90012

Time: 9:30 a.m.

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I, David C. Parisi, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner of the law firm of Parisi & Havens LLP, and pursuant to the Court’s Order, I submit this declaration. I am a member of the Bar of the State of California and licensed to practice before this Court. I make this declaration based upon my own personal knowledge. If called to testify, I could and would testify to the facts contained herein. I am competent to testify that the following facts are true and correct to the best of my knowledge.

2. I am submitting this Declaration setting forth the time expended by the professionals in my firm and the expenses that we incurred in support of the application for an award of attorneys’ fees and reimbursement of expenses incurred in connection with services rendered in the actions entitled *In Re Quantcast Advertising Cookie Litigation* (“*Quantcast* action”) and *In Re Clearspring Flash Cookie Litigation* (“*Clearspring* action”) (the “Actions”).

3. In connection with the prosecution of the claims set forth in the Actions, at the direction and request of the Interim Lead Counsel, my firm performed numerous tasks including, but not limited to performing legal research for and revising the draft complaints, strategizing legal theories with counsel, analyzing insurance policies of defendants for purposes of assessing defendants’ assets available for any resolution, attending the mediation session and discussing in depth the legal theories with the mediator and various defendants’ counsel, drafting and revising the settlement agreement and supporting documents, including the motion for preliminary approval, and preparing for and attending several of the hearings in the Actions.

4. The Actions were pursued on a fully contingent basis. The total number of hours expended by the attorneys and professional support staff of my firm through April

1 18, 2011 in the *Quantcast* action is 146.2 hours and in the *Clearspring* action is 66.3
2 hours. This number is derived from the time records regularly maintained by my firm. A
3 listing of the professionals who worked on these actions, the number of hours spent by
4 each such professional and their hourly rate, is attached as Exhibit A. The lodestar value
5 of the services performed by my firm in the *Quantcast* action is \$59,238.00 and in the
6 *Clearspring* action is \$26,589.00. This loadstar is based upon our current hourly rates of
7 \$510.00 for myself (I have been practicing law for over 18 years), \$490.00 for Suzanne
8 Havens Beckman (Ms. Havens Beckman has over 16 years experience practicing law) and
9 \$250.00 for Azita Moradmam (Ms. Moradmam has been practicing law for 3 years).
10 The foregoing does not include any time spent by my firm in preparing the fee and
11 expense application in this matter.

12
13 5. As detailed in Exhibit B, my firm has incurred a total of \$955.22 in
14 unreimbursed expenses in connection with the prosecution of the *Quantcast* action and
15 \$25.87 in connection with the *Clearspring* action.

16
17 6. The expenses incurred pertaining to these cases are reflected in the books
18 and records of this firm. These books and records are prepared from expense vouchers
19 and check records and are an accurate record of the expenses incurred.

20
21 I declare under penalty of perjury under the laws of the United States of America,
22 that the foregoing declaration is true and correct. Executed this 19th day of April 2011, at
23 Sherman Oaks, California.

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25 s/David C. Parisi
26 David C. Parisi

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EXHIBIT A

LODESTAR REPORT

CASE: In Re QUANTCAST ADVERTISING COOKIE LITIGATION
PERIOD: July 21, 2010 through April 18, 2011

Professional	Status*	HOURLY RATE	TOTAL HOURS	Current Lodestar
David C. Parisi	P	\$510.00	82	\$41,820.00
Suzanne Havens Beckman	P	\$490.00	5.7	\$2,793.00
Azita Moradmand	A	\$250.00	58.5	\$14,625.00
TOTAL			146.2	\$59,238.00

CASE: In Re CLEARSPRING FLASH COOKIE LITIGATION
PERIOD: August 19, 2010 through April 18, 2011

Professional	Status*	HOURLY RATE	TOTAL HOURS	Current Lodestar
David C. Parisi	P	\$510.00	36.3	\$18,513.00
Suzanne Havens Beckman	P	\$490.00	2.4	\$1,176.00
Azita Moradmand	A	\$250.00	27.6	\$6,900.00
TOTAL			66.3	\$26,589.00

* Partner (P)
Associate (A)

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EXHIBIT B
EXPENSE REPORT

CASE: In Re QUANTCAST ADVERTISING COOKIE LITIGATION

SUMMARY OF COST

Messenger/Filing Fees	\$904.72
Overnight Delivery	\$17.56
Legal Research	\$12.94
Travel Related	\$20.00

TOTAL COSTS \$955.22

CASE: In Re CLEARSPRING FLASH COOKIE LITIGATION

SUMMARY OF COSTS

Overnight Delivery	\$5.87
Travel Related	\$20.00

TOTAL COSTS \$25.87