

1 Francis O. Scarpulla (41059)
 Craig C. Corbitt (83251)
 2 Judith A. Zahid (215418)
 Patrick B. Clayton (240191)
 3 Qianwei Fu (242669)
 Heather T. Rankie (268002)
 4 ZELLE HOFMANN VOELBEL & MASON LLP
 44 Montgomery Street, Suite 3400
 5 San Francisco, CA 94104
 Telephone: (415) 693-0700
 6 Facsimile: (415) 693-0770
 fscarpulla@zelle.com

7
 8 Joseph M. Alioto (42680)
 Theresa D. Moore (99978)
 ALIOTO LAW FIRM
 9 225 Bush Street, 16th Floor
 San Francisco, CA 94104
 10 Telephone: (415) 434-8900
 Facsimile: (415) 434-9200
 11 jmalimoto@aliotolaw.com

12 *Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

13
 14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN FRANCISCO DIVISION**

17 IN RE TFT-LCD (FLAT PANEL)) Case No. 3:07-MD-1827 SI
 ANTITRUST LITIGATION) MDL No. 1827
)

18)
 19 This Document Relates to:) **[PROPOSED] ORDER RE:**
 20 All Indirect-Purchaser Actions;) **DISTRIBUTION FROM ESCROW**
) **FUNDS FOR CLAIMS**
) **ADMINISTRATION**

21 *State of Missouri, et al. v. AU Optronics*)
Corporation, et al., Case No. 10-cv-3619;)
) The Honorable Susan Illston
 22 *State of Florida v. AU Optronics Corporation,*)
et al., Case No. 10-cv-3517; and)
 23)
 24 *State of New York v. AU Optronics Corporation,*)
et al., Case No. 11-cv-0711.)
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[PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION

1 WHEREAS, on December 27, 2011, the Court granted final approval to settlements
2 between the Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California,
3 Florida, Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) on the
4 one hand, and defendants Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp, as
5 identified in the respective Settlement Agreements, and inclusive of related entities also
6 identified in the respective Settlement Agreements (collectively, “Group-I Settling Defendants”),
7 on the other hand; and

8 WHEREAS, on July 30, 2012, the Court granted preliminary approval to the settlements
9 between IPPs and the Settling States, and defendants AUO, LG and Toshiba, as identified in the
10 respective Settlement Agreements (collectively, “Group-II Settling Defendants” and with the
11 Group-I Settling Defendants referred to hereafter as “All Settling Defendants”), on the other
12 hand; and

13 WHEREAS, the Settlement Agreements with All Settling Defendants provide that the
14 costs of administration of the claims process shall be paid from the Settlement Fund of each
15 Settling Defendant, *pro rata*, based on each Settling Defendant’s Settlement Amount; and

16 WHEREAS, the cost of media purchases invoiced by Kinsella Media is \$280105.12 (see
17 Exhibit 1 attached hereto); and

18 WHEREAS, pursuant to the Settlement Agreements the following amounts may be
19 deducted from each Settling Defendant’s Settlement Fund to pay such costs of media purchases:

20	Chimei	\$28,545.78
21	Chunghwa	\$1,373.30
22	Epson	\$737.76
23	HannStar	\$6,639.86
24	Hitachi	\$10,089.80
25	Samsung	\$62,127.33
26	Sharp	\$29,898.78
27	AUO	\$41,806.52
28	LG	\$93,449.85

EXHIBIT 1



Invoice

625 MARQUETTE AVENUE, SUITE 880
 MINNEAPOLIS, MN 55402
 P 612.359.2000 | F 612.359.2050
 WWW.RUSTCONSULTING.COM
 FEDERAL ID #: 41-1813634

DATE: 01/14/13
 INVOICE #: 128722
 MATTER #: 8292

TO: Francis O. Scarpulla
 Zelle Hofmann Voelbel & Mason LLP
 44 Montgomery Street
 Suite 3400
 San Francisco, CA 94104
fscarpulla@zelle.com
jdc@coopkirk.com

PROJECT
<i>LCD Indirect December 2012 Claims Administration Services</i>

Claimant Communication/Opt-Outs	\$ 2,987.70
Claim Form Processing	11,977.74
Audits	4,561.68
Claim Forms Submitted (66,051 @ \$0.15 each)	9,907.65
Project Management	10,089.10
Technical Consulting	3,242.43
Scanning	2,240.55
Telephone Support	27,362.50
Quality Assurance	2,496.40
Return Mail Processing	48.88
Financial	112.50
	SUBTOTAL 75,027.13

Expenses: Other Charges and Out-of-Pocket Costs	
Email Blast (29,625 @ \$0.075 each)	2,221.88
Call Center/Telecommunications	15,480.65
Postage/Federal Express	221.19
Shredding/Storage	109.21
Other/Supplies	188.15
Photocopies/Faxing/Printing	1,930.00
Post Office Box Rental	1,080.00
Website Hosting	250.00
	SUBTOTAL 21,481.08

TOTAL INVOICE \$ 96,508.21

OUTSTANDING INVOICE(S) \$ 183,596.91

TOTAL AMOUNT DUE \$ 280,105.12

PAYMENT TERMS: NET DUE UPON RECEIPT

WIRE INFORMATION

ACCOUNT #: 8093434387
 ABA/ROUTING # WIRE or ACH: 111014325
 BANK: BANK OF TEXAS, DALLAS, TX 75225
 BANK CONTACT: MAYRA LANDEROS 214.987.8817
 REFERENCE: INVOICE NUMBER

RUST

LOCKBOX MAILING ADDRESS:

P O BOX 142589
 DRAWER #9051
 Irving, TX 75014-2589



DATE: 01/14/13
INVOICE #: 128722
MATTER #: 8292

STATEMENT OF ACCOUNT

Current Invoice Period: December 2012 Claims Administration Services

Total Current Invoice \$ 96,508.21

OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
11/14/12	128575	91,029.45		91,029.45
12/13/12	128642	92,567.46		92,567.46

PREVIOUS BALANCE DUE \$ 183,596.91

Total Amount Due \$ 280,105.12

WIRE INFORMATION

ACCOUNT #: 8093434387
ABA/ROUTING # WIRE or ACH: 111014325
BANK: BANK OF TEXAS, DALLAS, TX 75225
BANK CONTACT: MAYRA LANDEROS 214.987.8817
REFERENCE: INVOICE NUMBER

RUST

LOCKBOX MAILING ADDRESS:

P O BOX 142589
DRAWER #9051
Irving, TX 75014-2589

PAYMENT TERMS: NET DUE UPON RECEIPT

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Claimant Communication/Opt-Outs 829202

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	117.00	2.00	234.00
Jose Rivera	JR	137.00	20.10	2,753.70
Total Fees:				2,987.70

Total Services 2,987.70

Total Expenses .00

Total This Matter 2,987.70

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Claim Form Processing 829203

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Data Capture Processor	144	52.00	146.26	7,605.52
Mailroom Processor	151144	52.00	74.86	3,892.72
Jose Rivera	JR	137.00	3.50	479.50

Total Fees: 11,977.74

Total Services 11,977.74

Total Expenses .00

Total This Matter 11,977.74

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Audits 829205

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Angela Hernandez	AH	137.00	23.64	3,238.68
Jose Rivera	JR	137.00	1.80	246.60
Mary Schoenherr	MS	117.00	9.20	1,076.40

Total Fees: 4,561.68

Total Services 4,561.68

Total Expenses .00

Total This Matter 4,561.68

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Project Management 829206

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	185.00	17.20	3,182.00
Charlene Young	CY	185.00	1.80	333.00
Doreen McGinley	DM	117.00	3.40	397.80
Jose Rivera	JR	137.00	33.90	4,644.30
Robin Niemiec	RN	195.00	6.10	1,189.50
Scott Klein	SK	137.00	2.50	342.50
Total Fees:				10,089.10

Total Services 10,089.10

Total Expenses ----- .00

Total This Matter ----- 10,089.10

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Technical Consulting

829207

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Debra Bushey	DB	200.00	5.00	1,000.00
Derrick Wersal	DW	137.00	0.89	121.93
F. Mike Miller	FMM	180.00	0.20	36.00
Greg Brown	GSB	137.00	2.60	356.20
Gregory Sartor	GWS	180.00	0.20	36.00
James Randall	JR	180.00	0.30	54.00
Kevin Hartman	KH	169.00	0.30	50.70
Lee Anderson	LA	137.00	0.80	109.60
Leticia Rivera	LR	169.00	0.50	84.50
Lucretia Hassing	LH	117.00	1.00	117.00
Roso Suarez	RS	180.00	6.80	1,224.00
Tracey Rolle	TR	75.00	0.70	52.50
Total Fees:				3,242.43

Total Services 3,242.43

Total Expenses ----- .00

Total This Matter ----- 3,242.43

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Scanning 829211

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Mailroom Processor	151144	52.00	0.15	7.80
Scan Image Processor	144	52.00	38.50	2,002.00
Jackie Jostock	JJ	85.00	2.25	191.25
Patricia Ernste	PE	158.00	0.25	39.50
Total Fees:				2,240.55

Total Services 2,240.55

Total Expenses ----- .00

Total This Matter ----- 2,240.55

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Telephone Support 829214

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
CSR	240	50.00	521.51	26,075.50
Jose Rivera	JR	137.00	3.50	479.50
Liz Daniels	LD	158.00	4.00	632.00
Robin Niemiec	RN	195.00	0.90	175.50
Total Fees:				27,362.50

Total Services 27,362.50

Total Expenses .00

Total This Matter 27,362.50

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Quality Assurance 829220

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Justin Honse	JH	158.00	15.30	2,417.40
Lourdes Millan	LM	158.00	0.50	79.00
Total Fees:				2,496.40

Total Services 2,496.40

Total Expenses .00

Total This Matter 2,496.40

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Return Mail Processing 829221

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Data Capture Processor	144	52.00	0.20	10.40
Mailroom Processor	151144	52.00	0.74	38.48
Total Fees:				48.88

Total Services 48.88

Total Expenses ----- .00

Total This Matter ----- 48.88

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Financial 829270

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Sylvia Nettles	SN	90.00	1.25	112.50
Total Fees:				112.50

Total Services 112.50

Total Expenses .00

Total This Matter 112.50

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Re: LCD Indirect - Expenses 829290

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
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Call Center/Telecommunications			
	12/31/12	Live Call Center Support; 874 Calls	7,975.00
	12/31/12	Long Distance 18508.9 Minutes	2,221.06
	12/31/12	Advanced Features	6.60
	12/31/12	IVR System Charge	250.00
	12/31/12	Line Maintenance Charge Schedule	355.00
	12/31/12	IVR 11126.17 Minutes	4,672.99
		Subtotal	15,480.65
Postage/Federal Express			
136954	12/04/12	Weekly Mail Pickup	2.51
137480	12/20/12	Weekly Mail Pickup	16.93
	12/31/12	Metered Postage; 1 piece	1.55
137865	12/31/12	Weekly Mail Pickup	78.00
	12/31/12	Metered Postage; 188 pieces	122.20
		Subtotal	221.19
Shredding/Storage			
	12/31/12	Storage and/or Shredding 3 Boxes	6.00
	12/31/12	Data Storage December 2012	61.21
	12/31/12	Storage and/or Shredding 21 Boxes	42.00
		Subtotal	109.21
Other			
	12/31/12	Barcode Labels;7526	188.15
		Subtotal	188.15
Photocopies/Faxing/Printing			
	12/31/12	Photocopies/Faxing/Printing ;9650	1,930.00
		Subtotal	1,930.00

Inv# 128722
Date Jan 14, 2013
Client Number 8292

Post Office Box Rental
137268 12/13/12 Post Office Box Rental

Subtotal 1,080.00
1,080.00

Website Hosting
12/31/12 Web Monitor & Host

Subtotal 250.00
250.00

Total Expenses 19,259.20

Total This Matter 19,259.20
