

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; )  
 )  
 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. )  
 )

The Honorable Susan Illston

[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 claims administration invoiced by Rust Consulting is \$55,948.97  
17 (see 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 claims  
20 administration:

21	Chimei	\$5,701.81
22	Chunghwa	\$274.32
23	Epson	\$147.37
24	HannStar	\$1,326.26
25	Hitachi	\$2,015.36
26	Samsung	\$12,409.48
27	Sharp	\$5,972.06
28	AUO	\$8,350.55

1	LG	\$18,665.93
2	<u>Toshiba</u>	<u>\$1,085.83</u>
3	<b>TOTAL</b>	<b>\$55,948.97</b>

4 WHEREAS, Well Fargo Bank, N.A. has informed the parties that it requires an order  
5 from the Court before it will distribute payment for these additional costs;

6 THEREFORE, IT IS HEREBY ORDERED that Wells Fargo Bank, N.A. shall wire  
7 **\$55,948.97** to the following account:

- 8 Bank of Texas
- 9 ABA/Routing # 111014325
- 10 Account # 8093434387
- 11 Account Name: Rust Consulting
- 12 Reference # 128325
- 13 Federal Tax ID # 41-1813634
- 14 Bank Contact: Mayra Landeros, (214) 987-8817

15 The balance of funds in the demand-deposit account, if any, shall be retained for  
16 additional costs as they are incurred.

17  
18 **IT IS SO ORDERED.**

19  
20 Dated: Oct. 23, 2013

  
\_\_\_\_\_  
Hon. Susan Illston  
United States District Judge

21  
22  
23  
24  
25  
26  
27 3250157v1

# 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: 10/16/13  
 INVOICE #: 138699  
 MATTER #: 8292

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

PROJECT
<i>LCD Indirect</i>
<i>September 2013 Claims Administration Services</i>

Project Database	\$ 849.30
Project Management	9,917.06
Technical Consulting	520.70
Website Modification	3,605.00
Document Receipting	252.72
Claim Forms Submitted (556 @ \$0.15 each)	83.40
Scanning	606.96
Correspondence/ Admin Mail	2,322.00
Data Capture	7,025.80
Return Mail Processing	48.06
Claims Validation & Audits	16,614.04
Deficiency Claim Processing	5,976.90
Mailroom & Data Capture Management	43.74
Call Center Support	1,824.78
	<b>SUBTOTAL</b> 49,690.46
Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/ Telecommunications	4,581.99
Postage/ Federal Express	275.64
Shredding/ Storage	767.28
Photocopies/ Faxing/ Printing	358.60
Website Hosting	275.00
	<b>SUBTOTAL</b> 6,258.51
	<b>TOTAL INVOICE</b> \$ 55,948.97
	<b>OUTSTANDING INVOICE(s)</b> \$ 183,916.55
	<b>TOTAL DUE</b> \$ 239,865.52

**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**

**PAYMENT MAILING ADDRESS:**

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



DATE: 10/16/13  
INVOICE #: 138699  
MATTER #: 8292

**STATEMENT OF ACCOUNT**

Current Invoice Period: September 2013 Claims Administration Services

**Total Current Invoice** \$ 55,948.97

OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
08/14/13	138486	105,836.43		105,836.43
09/16/13	138593	78,080.12		78,080.12

PREVIOUS BALANCE DUE \$ 183,916.55

**Total Amount Due** \$ 239,865.52

**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**

**PAYMENT MAILING ADDRESS:**

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

**PAYMENT TERMS: NET DUE UPON RECEIPT**

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

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

Re: LCD Indirect - Project Database 829202

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Greg Brown	GSB	141.00	0.50	70.50
Gregory Sartor	GWS	185.00	0.10	18.50
Rebecca Zoubek	RZ	80.00	1.60	128.00
Ron Swinehart	RS	188.00	1.10	206.80
Roso Suarez	RS	185.00	2.30	425.50
Total Fees:				849.30

Total Services 849.30

Total Expenses ----- .00

Total This Matter ----- 849.30

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Project Management 829206

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	17.30	3,321.60
Doreen McGinley	DM	125.00	1.80	225.00
Jose Rivera	JR	142.00	12.80	1,817.60
Justin Honse	JH	164.00	9.40	1,541.60
Robin Niemiec	RN	199.00	7.50	1,492.50
Sandra Peters	SP	164.00	8.24	1,351.36
Sylvia Nettles	SN	93.00	1.80	167.40
Total Fees:				9,917.06

Total Services 9,917.06

Total Expenses .00

Total This Matter 9,917.06



Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Technical Consulting 829207

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Hai Bui	HB	141.00	0.20	28.20
Lee Anderson	LA	141.00	1.00	141.00
Roso Suarez	RS	185.00	1.90	351.50
Total Fees:				520.70

Total Services 520.70

Total Expenses .00

Total This Matter 520.70

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Website Modification 829223

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	0.50	96.00
Greg Brown	GSB	141.00	0.80	112.80
Gregory Sartor	GWS	185.00	0.50	92.50
Hai Bui	HB	141.00	0.50	70.50
Jose Rivera	JR	142.00	7.20	1,022.40
Mary Schoenherr	MS	125.00	1.90	237.50
Robin Niemiec	RN	199.00	2.70	537.30
Roso Suarez	RS	185.00	5.60	1,036.00
Venkata Gopagari	VG	200.00	2.00	400.00
Total Fees:				3,605.00

Total Services 3,605.00

Total Expenses .00  
-----

Total This Matter 3,605.00  
-----

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Document Receipting 829230

For Professional Services Rendered:

TIMEKEEPER			RATE	HOURS	FEEES
Processor	244	244	54.00	4.68	252.72
Total Fees:					252.72

Total Services 252.72

Total Expenses .00  
-----

Total This Matter 252.72  
-----

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Scanning 829231

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Scan Image Processor	144	54.00	11.24	606.96
Total Fees:				606.96

Total Services 606.96

Total Expenses .00  
-----

Total This Matter 606.96  
-----

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Correspondence/Admin Mail 829232

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	0.60	115.20
Doreen McGinley	DM	125.00	16.20	2,025.00
Jose Rivera	JR	142.00	0.40	56.80
Mary Schoenherr	MS	125.00	1.00	125.00
Total Fees:				2,322.00

Total Services 2,322.00

Total Expenses ----- .00

Total This Matter ----- 2,322.00

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Data Capture 829234

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Data Capture Processor	144	54.00	0.51	27.54
Doreen McGinley	DM	125.00	18.00	2,250.00
Kenneth Rivera	KR	90.00	39.10	3,519.00
Mary Schoenherr	MS	125.00	5.00	625.00
Travis Duarte	TD	54.00	11.19	604.26
Total Fees:				7,025.80

Total Services 7,025.80

Total Expenses .00

Total This Matter 7,025.80

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Return Mail Processing 829235

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Mailroom Processor	151144	54.00	0.89	48.06
Total Fees:				48.06

Total Services 48.06

Total Expenses .00

Total This Matter 48.06

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Claims Validation & Audits 829236

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	7.80	1,497.60
Doreen McGinley	DM	125.00	0.60	75.00
JoAnn Calderin	JC	90.00	3.00	270.00
Jose Rivera	JR	142.00	11.40	1,618.80
Justin Honse	JH	164.00	2.30	377.20
Kenneth Rivera	KR	90.00	44.30	3,987.00
Mary Schoenherr	MS	125.00	0.10	12.50
Robin Niemiec	RN	199.00	2.20	437.80
Taryn Diddle	TD	54.00	5.33	287.82
Travis Duarte	TD	54.00	149.08	8,050.32
Total Fees:				16,614.04

Total Services 16,614.04

Total Expenses .00  
-----

Total This Matter 16,614.04  
-----



Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Deficiency Claim Processing 829237

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	125.00	36.50	4,562.50
Jose Rivera	JR	142.00	3.80	539.60
Justin Honse	JH	164.00	3.20	524.80
Mary Schoenherr	MS	125.00	2.80	350.00
Total Fees:				5,976.90

Total Services 5,976.90

Total Expenses .00

Total This Matter 5,976.90

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Mailroom & Data Capture Management 829239

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Mailroom Processor	151144	54.00	0.81	43.74
Total Fees:				43.74

Total Services 43.74

Total Expenses .00  
-----

Total This Matter 43.74  
-----

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Call Center Support 829247

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
CSR	240	52.00	0.39	20.28
April Hyduk	AH	192.00	1.90	364.80
Doreen McGinley	DM	125.00	1.20	150.00
Jose Rivera	JR	142.00	6.70	951.40
Robin Niemiec	RN	199.00	1.70	338.30
Total Fees:				1,824.78

Total Services 1,824.78

Total Expenses .00

Total This Matter 1,824.78

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Re: LCD Indirect - Expenses

829290

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
-----	----	-----	-----
Call Center/Telecommunications			
	09/30/13	Conference Calls; 794.75 minutes	309.95
	09/30/13	IVR 2200.52 Minutes	924.22
	09/30/13	IVR System Charge	250.00
	09/30/13	Line Maintenance Charge Schedule	130.00
	09/30/13	Long Distance 3898.5 Minutes	467.82
	09/30/13	Live Call Center Support; 243 Calls	2,500.00
		Subtotal	4,581.99
Postage/Federal Express			
	09/30/13	Weekly Mail Pickup	30.33
	09/30/13	Weekly Mail Pickup	2.43
	09/30/13	Metered Postage; 528 pieces	242.88
		Subtotal	275.64
Shredding/Storage			
	09/30/13	Data Storage September 2013	731.28
	09/30/13	Storage and/or Shredding 16 Boxes	32.00
	09/30/13	Storage and/or Shredding 2 Boxes	4.00
		Subtotal	767.28
Photocopies/Faxing/Printing			
	09/30/13	Photocopies/Faxing/Printing ;1793	358.60
		Subtotal	358.60
Website Hosting			
	09/27/13	Web Monitor & Host	275.00
		Subtotal	275.00

Inv# 138699  
Date Oct 16, 2013  
Client Number 8292

Total Expenses	6,258.51
	-----
Total This Matter	6,258.51
	-----