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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 \$61,736.89  
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	\$6,291.67
22	Chunghwa	\$302.68
23	Epson	\$162.61
24	HannStar	\$1,463.47
25	Hitachi	\$2,223.85
26	Samsung	\$13,693.25
27	Sharp	\$6,589.87
28	AUO	\$9,214.41

1	LG	\$20,596.92
2	<u>Toshiba</u>	<u>\$1,198.16</u>
3	<b>TOTAL</b>	<b>\$61,736.89</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 **\$61,736.89** 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: 11/22, 2013

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

21  
22  
23  
24  
25  
26  
27 3250803v1

# 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: 11/14/13  
INVOICE #: 138779  
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>October 2013 Claims Administration Services</i>

Project Database	\$ 1,859.01
Project Management	4,014.24
Technical Consulting	435.30
Follow-Up Notice	746.50
Address Trace	93.89
Document Receipting	126.36
Claim Forms Submitted (561 @ \$0.15 each)	84.15
Scanning	82.08
Correspondence/ Admin Mail	1,862.50
Data Capture	227.62
Return Mail Processing	12.96
Claims Validation & Audits	33,091.46
Deficiency Claim Processing	12,879.34
Deficiency Notification	1,267.21
Mailroom & Data Capture Management	81.54
Call Center Support	409.74
	<b>SUBTOTAL</b> 57,273.90
Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/ Telecommunications	2,685.89
Postage/ Federal Express	1.24
Shredding/ Storage	745.97
Photocopies/ Faxing/ Printing	507.20
Address Trace	42.55
Website Hosting	480.14
	<b>SUBTOTAL</b> 4,462.99
	<b>TOTAL INVOICE</b> \$ 61,736.89

**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

Inv# 138779  
Date Nov 14, 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
Carol Osborne	CO	141.00	0.16	22.56
Greg Brown	GSB	141.00	0.10	14.10
Justin Honse	JH	164.00	2.40	393.60
Rebecca Zoubek	RZ	80.00	0.60	48.00
Roso Suarez	RS	185.00	4.20	777.00
Shane McDonald	SM	175.00	3.45	603.75
Total Fees:				1,859.01

Total Services 1,859.01

Total Expenses .00

Total This Matter 1,859.01

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Project Management 829206

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	7.10	1,363.20
Doreen McGinley	DM	125.00	1.30	162.50
Justin Honse	JH	164.00	7.70	1,262.80
Paul Vedder	PV	142.00	0.57	80.94
Robin Niemiec	RN	199.00	3.50	696.50
Robin Weiss	RW	90.00	0.50	45.00
Roso Suarez	RS	185.00	0.50	92.50
Sandra Peters	SP	192.00	1.00	192.00
Sylvia Nettles	SN	93.00	0.90	83.70
Taryn Diddle	TD	54.00	0.65	35.10
Total Fees:				4,014.24

Total Services 4,014.24

Total Expenses .00  
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Total This Matter 4,014.24  
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Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Technical Consulting 829207

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Hai Bui	HB	141.00	0.60	84.60
Lee Anderson	LA	141.00	1.70	239.70
Mahin Alam	MA	185.00	0.10	18.50
Michael Oanes	MO	185.00	0.20	37.00
Roso Suarez	RS	185.00	0.30	55.50
Total Fees:				435.30

Total Services 435.30

Total Expenses .00

Total This Matter 435.30



Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Follow-Up Notice 829213

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Leticia Rivera	LR	175.00	1.20	210.00
Roso Suarez	RS	185.00	2.90	536.50
Total Fees:				746.50

Total Services 746.50

Total Expenses ----- .00

Total This Matter ----- 746.50

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Address Trace 829216

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Carol Osborne	CO	141.00	0.29	40.89
Rebecca Zoubek	RZ	80.00	0.20	16.00
Roso Suarez	RS	185.00	0.20	37.00

Total Fees: 93.89

Total Services 93.89

Total Expenses .00

Total This Matter 93.89

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Document Receipting 829230

For Professional Services Rendered:

TIMEKEEPER			RATE	HOURS	FEEES
Processor	244	244	54.00	2.34	126.36
Total Fees:					126.36

Total Services 126.36

Total Expenses .00  
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Total This Matter 126.36  
-----

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Scanning 829231

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Scan Image Processor	144	54.00	1.52	82.08
Total Fees:				82.08

Total Services 82.08

Total Expenses .00  
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Total This Matter 82.08  
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Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Correspondence/Admin Mail 829232

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	125.00	13.20	1,650.00
Mary Schoenherr	MS	125.00	1.70	212.50
Total Fees:				1,862.50

Total Services 1,862.50

Total Expenses .00  
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Total This Matter 1,862.50  
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Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Data Capture 829234

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Data Capture Processor	144	54.00	0.28	15.12
Mary Schoenherr	MS	125.00	1.70	212.50
Total Fees:				227.62

Total Services 227.62

Total Expenses .00  
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Total This Matter 227.62  
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Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Return Mail Processing 829235

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Mailroom Processor	151144	54.00	0.24	12.96
Total Fees:				12.96

Total Services 12.96

Total Expenses .00  
-----

Total This Matter 12.96  
-----

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Claims Validation & Audits 829236

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	9.70	1,862.40
Doreen McGinley	DM	125.00	3.40	425.00
JoAnn Calderin	JC	90.00	0.75	67.50
Justin Honse	JH	164.00	6.40	1,049.60
Mary Schoenherr	MS	125.00	5.60	700.00
Paul Vedder	PV	142.00	20.76	2,947.92
Robin Niemiec	RN	199.00	7.00	1,393.00
Robin Weiss	RW	90.00	2.00	180.00
Sandra Peters	SP	188.77	90.32	17,049.68
Taryn Diddle	TD	54.00	0.58	31.32
Travis Duarte	TD	54.00	136.76	7,385.04
Total Fees:				33,091.46

Total Services 33,091.46

Total Expenses .00

Total This Matter 33,091.46



Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Deficiency Claim Processing 829237

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	125.00	67.00	8,375.00
Kenneth Rivera	KR	90.00	18.00	1,620.00
Mary Schoenherr	MS	125.00	6.30	787.50
Robin Niemiec	RN	199.00	2.00	398.00
Taryn Diddle	TD	54.00	9.89	534.06
Travis Duarte	TD	54.00	21.57	1,164.78
Total Fees:				12,879.34

Total Services 12,879.34

Total Expenses ----- .00

Total This Matter ----- 12,879.34

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Deficiency Notification 829238

For Professional Services Rendered:

TIMEKEEPER			RATE	HOURS	FEEES
Processor	244	244	54.00	1.59	85.86
Joel Cooper		JC	175.00	1.20	210.00
Julie Zitzmann		JZ	121.00	3.15	381.15
Justin Honse		JH	164.00	1.90	311.60
Robin Niemiec		RN	199.00	1.40	278.60
Total Fees:					1,267.21

Total Services 1,267.21

Total Expenses .00

Total This Matter 1,267.21

Inv# 138779  
Date Nov 14, 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	1.51	81.54
Total Fees:				81.54

Total Services 81.54

Total Expenses .00  
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Total This Matter 81.54  
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Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Call Center Support 829247

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
CSR	240	52.00	1.17	60.84
April Hyduk	AH	192.00	1.00	192.00
Doreen McGinley	DM	125.00	0.30	37.50
Robin Niemiec	RN	199.00	0.60	119.40
Total Fees:				409.74

Total Services 409.74

Total Expenses .00

Total This Matter 409.74

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Re: LCD Indirect - Expenses 829290

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
-----	----	-----	-----
Call Center/Telecommunications			
	10/30/13	Live Call Center Support; 110 Calls	1,300.00
	10/31/13	Line Maintenance Charge Schedule	130.00
	10/31/13	IVR 1701.83 Minutes	714.77
	10/31/13	IVR System Charge	250.00
	10/31/13	Long Distance 2426 Minutes	291.12
		Subtotal	2,685.89
Postage/Federal Express			
	10/31/13	Metered Postage; 2 pieces	0.92
	10/31/13	Weekly Mail Pickup	0.32
		Subtotal	1.24
Shredding/Storage			
	10/30/13	Storage and/or Shredding 2 Boxes	4.00
	10/31/13	Data Storage October 2013	731.97
	10/31/13	Storage and/or Shredding 5 Boxes	10.00
		Subtotal	745.97
Photocopies/Faxing/Printing			
	10/31/13	Photocopies/Faxing/Printing ;2536	507.20
		Subtotal	507.20
Address Traces:			
	10/31/13	Address Traces: 37 traces	42.55
		Subtotal	42.55
Website Hosting			
	10/29/13	Web Monitor & Host	275.00
	10/30/13	Domain Renewal	205.14

Inv# 138779  
Date Nov 14, 2013  
Client Number 8292

Subtotal 480.14

Total Expenses 4,462.99  
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Total This Matter 4,462.99  
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