

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.)
 25)

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 \$43,457.40
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	\$4,428.78
22	Chunghwa	\$213.06
23	Epson	\$114.46
24	HannStar	\$1,030.15
25	Hitachi	\$1,565.40
26	Samsung	\$9,638.85
27	Sharp	\$4,638.70
28	AUO	\$6,486.15

1 LG \$14,498.45
2 Toshiba \$843.40
3 **TOTAL \$43,457.40**

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 **\$43,457.40** 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: 3/6, 2014



Hon. Susan Illston
United States District Judge

21
22
23
24
25
26
27 3252749v1

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: 02/21/14
INVOICE #: 14-8008
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</i>
<i>January 2014 Claims Administration Services</i>

Project Database	\$ 592.80
Project Management	6,095.29
Technical Consulting	420.80
Document Receipting	249.15
Claim Forms Submitted (1,358 @ \$0.15 each)	203.70
Scanning	245.30
Correspondence/ Admin Mail	2,967.78
Data Capture	5,204.00
Claims Validation & Audits	12,541.58
Deficiency Claim Processing	3,209.70
Deficiency Notification	5,316.57
Mailroom & Data Capture Management	58.30
Call Center Training	194.91
Call Center Support	506.24
	SUBTOTAL 37,806.12
Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/ Telecommunications	3,140.20
Postage/ Federal Express	1,210.85
Shredding/ Storage	937.83
Other/ Supplies	3.10
Photocopies/ Faxing/ Printing	59.30
Website Hosting	300.00
	SUBTOTAL 5,651.28
	TOTAL INVOICE \$ 43,457.40

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# 148008
Date Feb 21, 2014
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
Joel Cooper	JC	180.00	0.60	108.00
Rebecca Zoubek	RZ	96.00	0.30	28.80
Roso Suarez	RS	190.00	2.40	456.00
Total Fees:				592.80

Total Services 592.80

Total Expenses .00

Total This Matter 592.80

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Project Management 829206

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Danielle Cook	DC	93.00	4.35	404.55
Doreen McGinley	DM	130.00	4.80	624.00
Justin Honse	JH	170.00	7.30	1,241.00
Robin Niemiec	RN	215.00	3.70	795.50
Sandra Peters	SP	195.00	12.60	2,457.00
Sondra Weikert	SW	147.00	2.92	429.24
Sylvia Nettles	SN	96.00	1.50	144.00
Total Fees:				6,095.29

Total Services 6,095.29

Total Expenses ----- .00

Total This Matter ----- 6,095.29

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Technical Consulting 829207

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Hai Bui	HB	147.00	1.20	176.40
Jason Moberg	JM	170.00	0.10	17.00
Lee Anderson	LA	147.00	1.20	176.40
Michael Oanes	MO	170.00	0.30	51.00
Total Fees:				420.80

Total Services 420.80

Total Expenses .00

Total This Matter 420.80

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Document Receipting 829230

For Professional Services Rendered:

TIMEKEEPER			RATE	HOURS	FEEES
Processor	244	244	55.00	4.53	249.15
Total Fees:					249.15

Total Services 249.15

Total Expenses .00

Total This Matter 249.15

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Scanning 829231

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Scan Image Processor	144	55.00	4.46	245.30
Total Fees:				245.30

Total Services 245.30

Total Expenses .00

Total This Matter 245.30

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Correspondence/Admin Mail 829232

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Danielle Cook	DC	93.00	1.76	163.68
Doreen McGinley	DM	130.00	13.20	1,716.00
Travis Duarte	TD	93.00	11.70	1,088.10

Total Fees: 2,967.78

Total Services 2,967.78

Total Expenses .00

Total This Matter 2,967.78

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Data Capture 829234

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Data Capture Processor	144	55.00	4.80	264.00
Doreen McGinley	DM	130.00	38.00	4,940.00
Total Fees:				5,204.00

Total Services 5,204.00

Total Expenses .00

Total This Matter 5,204.00

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Claims Validation & Audits 829236

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Danielle Cook	DC	93.00	27.02	2,512.86
Justin Honse	JH	170.00	2.10	357.00
Robin Niemiec	RN	215.00	1.00	215.00
Sandra Peters	SP	195.00	17.29	3,371.55
Sondra Weikert	SW	147.00	6.10	896.70
Taryn Diddle	TD	93.00	9.03	839.79
Travis Duarte	TD	93.00	46.76	4,348.68
Total Fees:				12,541.58

Total Services 12,541.58

Total Expenses .00

Total This Matter 12,541.58

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Deficiency Claim Processing 829237

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	130.00	22.20	2,886.00
Sandra Peters	SP	195.00	1.66	323.70
Total Fees:				3,209.70

Total Services 3,209.70

Total Expenses .00

Total This Matter 3,209.70

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Deficiency Notification

829238

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Ann Bultman	AB	130.00	0.28	36.40
Cynthia Romero	CR	180.00	1.60	288.00
Danielle Cook	DC	93.00	1.75	162.75
Joel Cooper	JC	180.00	0.70	126.00
Juan Carlos Quiroz	JQ	180.00	0.50	90.00
Julie Zitzmann	JZ	130.00	2.49	323.70
Justin Honse	JH	170.00	1.45	246.50
Kathy Vatland	KV	147.00	0.39	57.33
Leticia Rivera	LR	180.00	0.50	90.00
Lucretia Hassing	LH	130.00	0.60	78.00
Michelle Swanson	MS	147.00	0.42	61.74
Robin Niemiec	RN	215.00	3.70	795.50
Roso Suarez	RS	190.00	2.80	532.00
Sandra Peters	SP	195.00	1.22	237.90
Sondra Weikert	SW	147.00	8.35	1,227.45
Thomas Bauer	TB	130.00	6.01	781.30
Vickie Lee	VL	130.00	1.40	182.00

Total Fees: 5,316.57

Total Services 5,316.57

Total Expenses .00

Total This Matter 5,316.57

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Mailroom & Data Capture Management 829239

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Mailroom Processor	151144	55.00	1.06	58.30
Total Fees:				58.30

Total Services 58.30

Total Expenses .00

Total This Matter 58.30

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Call Center Training 829245

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
CSR	240	53.00	1.83	96.99
Rebecca Hensel	RH	96.00	1.02	97.92
Total Fees:				194.91

Total Services 194.91

Total Expenses .00

Total This Matter 194.91

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Call Center Support 829247

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	195.00	0.40	78.00
Doreen McGinley	DM	130.00	1.50	195.00
Rebecca Hensel	RH	96.00	0.19	18.24
Robin Niemiec	RN	215.00	1.00	215.00
Total Fees:				506.24

Total Services 506.24

Total Expenses ----- .00

Total This Matter ----- 506.24

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Re: LCD Indirect - Expenses 829290

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
-----	----	-----	-----
Call Center/Telecommunications			
	01/30/14	Live Call Center Support; 171 Calls	1,845.00
	01/31/14	Line Maintenance Charge Schedule	150.00
	01/31/14	IVR 1523.27 Minutes	639.77
	01/31/14	IVR System Charge	275.00
	01/31/14	Long Distance 1920.3 Minutes	230.43
		Subtotal	3,140.20
Postage/Federal Express			
	01/29/14	Weekly Mail Pickup	2.43
	01/29/14	Metered Postage; 317 pieces	145.82
	01/30/14	Metered Postage; 31 pieces	14.26
	01/31/14	Postage; 2279 pieces	1,048.34
		Subtotal	1,210.85
Shredding/Storage			
	01/31/14	Storage and/or Shredding 44 Boxes	99.00
	01/31/14	Storage and/or Shredding 6 Boxes	13.50
	01/31/14	Storage and/or Shredding 5 Boxes	11.25
	01/31/14	Data Storage January 2014	814.08
		Subtotal	937.83
Other			
	01/31/14	#10 Window Envelope;31	3.10
		Subtotal	3.10
Photocopies/Faxing/Printing			
	01/31/14	Photocopies/Faxing/Printing	59.30
		Subtotal	59.30

Inv# 148008
Date Feb 21, 2014
Client Number 8292

Website Hosting
01/30/14 Web Monitor & Host

Subtotal 300.00
300.00

Total Expenses 5,651.28

Total This Matter 5,651.28
