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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 \$62,211.72
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	\$6,340.06
22	Chunghwa	\$305.01
23	Epson	\$163.86
24	HannStar	\$1,474.72
25	Hitachi	\$2,240.96
26	Samsung	\$13,798.56
27	Sharp	\$6,640.56
28	AUO	\$9,285.28

1	LG	\$20,755.34
2	<u>Toshiba</u>	<u>\$1,207.37</u>
3	TOTAL	\$62,211.72

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 **\$62,211.72** 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: 6/25, 2014



Hon. Susan Illston
United States District Judge

21
22
23
24
25
26
27 3255362v1

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: 06/12/14
INVOICE #: 14-8348
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>May 2014 Claims Administration Services</i>

Project Database	\$ 702.10
Project Management	7,786.00
Technical Consulting	90.50
Website Modification	115.40
Document Receipting	437.20
Claim Forms Submitted (233 @ \$0.15 each)	34.95
Scanning	414.71
Correspondence/ Admin Mail	3,692.00
Data Capture	4,320.30
Claims Validation & Audits	33,514.00
Deficiency Claim Processing	7,774.90
Mailroom & Data Capture Management	43.45
Call Center Support	1,057.60
	SUBTOTAL <u>59,983.11</u>
Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/ Telecommunications	1,517.59
Postage/ Federal Express	201.97
Shredding/ Storage	132.75
Photocopies/ Faxing/ Printing	70.30
Address Traces	6.00
Website Hosting	300.00
	SUBTOTAL <u>2,228.61</u>
	TOTAL INVOICE <u>\$ 62,211.72</u>

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# 148348
Date Jun 12, 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
Greg Brown	GSB	147.00	0.30	44.10
Rebecca Zoubek	RZ	96.00	2.50	240.00
Roso Suarez	RS	190.00	2.20	418.00
Total Fees:				702.10

Total Services 702.10

Total Expenses .00

Total This Matter 702.10

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Project Management 829206

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Danielle Cook	DC	93.00	1.40	130.20
Justin Honse	JH	170.00	6.20	1,054.00
Paul Vedder	PV	147.00	1.00	147.00
Robin Niemiec	RN	215.00	6.90	1,483.50
Sandra Peters	SP	195.00	13.80	2,691.00
Sondra Weikert	SW	147.00	14.50	2,131.50
Sylvia Nettles	SN	96.00	1.55	148.80
Total Fees:				7,786.00

Total Services 7,786.00

Total Expenses .00

Total This Matter 7,786.00

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Technical Consulting 829207

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEE
Jason Moberg	JM	170.00	0.10	17.00
Lee Anderson	LA	147.00	0.50	73.50
Total Fees:				90.50

Total Services 90.50

Total Expenses ----- .00

Total This Matter ----- 90.50

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Website Modification 829223

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEE\$
Hai Bui	HB	147.00	0.20	29.40
Robin Niemiec	RN	215.00	0.40	86.00
Total Fees:				115.40

Total Services 115.40

Total Expenses ----- .00

Total This Matter ----- 115.40

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Document Receipting 829230

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Mailroom Processor	151144	55.00	0.24	13.20
Processor	244	55.00	3.70	203.50
Scan Image Processor	144	0.00	0.00	0.00
Sondra Weikert	SW	147.00	1.50	220.50
Total Fees:				437.20

Total Services 437.20

Total Expenses .00

Total This Matter 437.20

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Scanning 829231

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Scan Image Processor	144	55.00	5.84	321.20
Jace Krause	JK	96.00	0.06	5.76
Kalene Jones	KLJ	195.00	0.45	87.75
Total Fees:				414.71

Total Services 414.71

Total Expenses .00

Total This Matter 414.71

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Correspondence/Admin Mail 829232

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	130.00	28.40	3,692.00
Total Fees:				3,692.00

Total Services 3,692.00

Total Expenses .00

Total This Matter 3,692.00

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Data Capture 829234

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Data Capture Processor	144	55.00	2.14	117.70
Danielle Cook	DC	93.00	0.30	27.90
Doreen McGinley	DM	130.00	29.10	3,783.00
Jason Moberg	JM	170.00	0.40	68.00
JoAnn Calderin	JC	93.00	1.90	176.70
Sondra Weikert	SW	147.00	1.00	147.00
Total Fees:				4,320.30

Total Services 4,320.30

Total Expenses .00

Total This Matter 4,320.30

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Claims Validation & Audits 829236

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Danielle Cook	DC	93.00	115.70	10,760.10
Doreen McGinley	DM	130.00	13.40	1,742.00
JoAnn Calderin	JC	93.00	25.05	2,329.65
Justin Honse	JH	170.00	4.90	833.00
Robin Weiss	RW	93.00	1.90	176.70
Sandra Peters	SP	195.00	51.73	10,087.35
Sondra Weikert	SW	147.00	51.60	7,585.20
Total Fees:				33,514.00

Total Services 33,514.00

Total Expenses .00

Total This Matter 33,514.00

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Deficiency Claim Processing 829237

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	130.00	4.90	637.00
Lucretia Hassing	LH	130.00	1.08	140.40
Sandra Peters	SP	195.00	19.30	3,763.50
Sondra Weikert	SW	147.00	22.00	3,234.00
Total Fees:				7,774.90

Total Services 7,774.90

Total Expenses .00

Total This Matter 7,774.90

Inv# 148348
Date Jun 12, 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	0.79	43.45
Total Fees:				43.45

Total Services 43.45

Total Expenses .00

Total This Matter 43.45

Inv# 148348
Date Jun 12, 2014
Client Number 8292

Re: LCD Indirect - Call Center Support 829247

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Danielle Cook	DC	93.00	2.00	186.00
Doreen McGinley	DM	130.00	0.70	91.00
Rebecca Hensel	RH	96.00	0.45	43.20
Robin Weiss	RW	93.00	0.50	46.50
Sondra Weikert	SW	147.00	4.70	690.90
Total Fees:				1,057.60

Total Services 1,057.60

Total Expenses .00

Total This Matter 1,057.60

Inv# 148348
Date Jun 12, 2014
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			
	05/29/14	Live Call Center Support Minimum	550.00
	05/31/14	Long Distance 1040.9 Minutes	124.91
	05/31/14	Conference Calls 198.8 Minutes	99.40
	05/31/14	IVR 757.82 Minutes	318.28
	05/31/14	IVR System Charge	275.00
	05/31/14	Line Maintenance Charge Schedule	150.00
		Subtotal	1,517.59
Postage/Federal Express			
	05/29/14	Metered Postage; 180 pieces	86.40
	05/29/14	Weekly Mail Pickup	4.33
	05/30/14	Federal Express	111.24
		Subtotal	201.97
Shredding/Storage			
	05/30/14	Storage and/or Shredding 8 Boxes	18.00
	05/31/14	Storage and/or Shredding 44 Boxes	99.00
	05/31/14	Storage and/or Shredding 7 Boxes	15.75
		Subtotal	132.75
Photocopies/Faxing/Printing			
	05/30/14	Photocopies/Faxing/Printing	70.30
		Subtotal	70.30
Address Traces:			
	05/31/14	12 Undeliverable Notice	6.00
		Subtotal	6.00
Website Hosting			

Inv# 148348
Date Jun 12, 2014
Client Number 8292

05/29/14 Web Monitor & Host

Subtotal 300.00
300.00

Total Expenses 2,228.61

Total This Matter 2,228.61
