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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:**
) **DISTRIBUTION FROM ESCROW**
 20 All Indirect-Purchaser Actions;) **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 \$63,220.30
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	\$6,442.84
22	Chunghwa	\$309.96
23	Epson	\$166.51
24	HannStar	\$1,498.63
25	Hitachi	\$2,277.29
26	Samsung	\$14,022.27
27	Sharp	\$6,748.22
28	AUO	\$9,435.82

1	LG	\$21,091.81
2	<u>Toshiba</u>	<u>\$1,226.95</u>
3	TOTAL	\$63,220.30

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 **\$63,220.30** 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: 8/1, 2014



Hon. Susan Illston
United States District Judge

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22
23
24
25
26
27 3256153v1

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: 07/18/14
INVOICE #: 14-5197
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
LCD Indirect June 2014 Claims Administration Services

Project Database	\$ 710.70
Project Management	5,723.10
Technical Consulting	427.90
Website Setup	118.11
Website Modification	479.85
Document Receipting	527.19
Claim Forms Submitted (259 @ \$0.15 each)	38.85
Scanning	284.89
Correspondence/ Admin Mail	3,757.00
Data Capture	2,888.45
Claims Validation & Audits	31,190.00
Deficiency Claim Processing	12,872.69
Mailroom & Data Capture Management	90.15
Call Center Support	1,358.54
SUBTOTAL	60,467.42

Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/ Telecommunications	1,577.33
Postage/ Federal Express	24.40
Post Office Box Rental	609.00
Shredding/ Storage	132.75
Photocopies/ Faxing/ Printing	109.40
Website Hosting	300.00
SUBTOTAL	2,752.88

TOTAL INVOICE \$ 63,220.30

WIRE INFORMATION

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

RUST

PAYMENT MAILING ADDRESS:

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

PAYMENT TERMS: NET DUE UPON RECEIPT



DATE: 07/18/14
INVOICE #:
MATTER #: 8292

STATEMENT OF ACCOUNT

Current Invoice Period: June 2014 Claims Administration Services

Total Current Invoice \$ 63,220.30

OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
12/17/13	138853	3,240.40		3,240.40

PREVIOUS BALANCE DUE \$ 3,240.40

Total Amount Due \$ 66,460.70

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