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11 *Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **SAN FRANCISCO DIVISION**

15 IN RE TFT-LCD (FLAT PANEL) ) Case No. 3:07-MD-1827 SI  
 16 ANTITRUST LITIGATION ) MDL No. 1827  
 )

17 )  
 18 This Document Relates to: ) **~~PROPOSED~~ ORDER RE:**  
 ) **DISTRIBUTION FROM ESCROW**  
 19 All Indirect-Purchaser Actions; ) **FUNDS FOR CLAIMS**  
 ) **ADMINISTRATION**

20 *State of Missouri, et al. v. AU Optronics* )  
*Corporation, et al.*, Case No. 10-cv-3619; )  
 )  
 21 *State of Florida v. AU Optronics Corporation,* )  
*et al.*, Case No. 10-cv-3517; and )  
 22 )  
 23 *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 July 11, 2012, the Court granted final approval to settlements between  
2 the Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California, Florida,  
3 Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) on the one  
4 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 April 3, 2013, the Court granted final 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 \$74,625.41  
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	\$7,605.15
22	Chunghwa	\$365.87
23	Epson	\$196.55
24	HannStar	\$1,768.99
25	Hitachi	\$2,688.12
26	Samsung	\$16,551.92
27	Sharp	\$7,965.61
28	AUO	\$11,138.06

1	LG	\$24,896.85
2	<u>Toshiba</u>	<u>\$1,448.29</u>
3	<b>TOTAL</b>	<b>\$74,625.41</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 **\$74,625.41** 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: Feb. 25, 2016

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

21  
22  
23  
24  
25  
26  
27 3269875v1

# 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: 02/23/16  
INVOICE #: 16-267  
MATTER #: 829200

**TO:** Qianwei Fu  
Attorney at Law  
Zelle LLP  
44 Montgomery Street, Suite 3400  
San Francisco, CA 94104  
[QFu@zelle.com](mailto:QFu@zelle.com)

PROJECT
LCD Indirect
January 2016 Claims Administration Services

Project Management	7,687.84
Technical Consulting	2,410.00
Initial Notice	61.60
Correspondence/ Admin Mail	32.34
Claims Validation & Audits	16.66
Call Center Support	362.60
Fund Distribution	1,545.38
Payment Calculations	2,155.84
Check Reissues	968.50
Bank Account Mgmt/ Tax Reporting	573.81
<b>SUBTOTAL</b>	<b>15,814.57</b>

Expenses and Other Charges:	
Call Center/ Telecommunications	\$ 1,353.64
Shredding/ Storage	2,512.70
Bank Fees/ Other	460.00
Photocopies/ Faxing/ Printing	62.30
Address Traces / Undeliverables	25.20
Website Hosting	325.00
<b>SUBTOTAL</b>	<b>4,738.84</b>

**TOTAL INVOICE \$ 20,553.41**

**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

**PAYMENT TERMS: NET DUE UPON RECEIPT**

**PAYMENT MAILING ADDRESS:**

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



DATE: 02/23/16  
INVOICE #: 16-267  
MATTER #: 829200

**STATEMENT OF ACCOUNT**

Current Invoice Per January 2016 Claims Administration Services

**Total Current Invoice** \$ 20,553.41

**OUTSTANDING INVOICES:**

Date	Invoice #	Amount	Payments	Balance
11/12/15	15-6173	14,603.65		14,603.65
1/4/16	15-6617	21,193.00		21,193.00
1/18/16	15-6730	18,275.35		18,275.35

**PREVIOUS BALANCE DUE** \$ 54,072.00

**Total Amount Due** \$ 74,625.41

**WIRE INFORMATION**

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