

Exhibit 7

1 Roberta D. Liebenberg, Esquire (PA Bar No. 31738)
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Class Counsel for the Direct Purchaser Class

6 UNITED STATES DISTRICT COURT
7
8 NORTHERN DISTRICT OF CALIFORNIA

9
10 IN RE CAPACITORS ANTITRUST LITIGATION

Master File No. 3:17-md-02801-JD

Case No. 3:14-cv-03264-JD

11 THIS DOCUMENT RELATES TO:
12 ALL DIRECT PURCHASER ACTIONS

DECLARATION OF ROBERTA D. LIEBENBERG IN SUPPORT OF CLASS COUNSELS' APPLICATION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES SUBMITTED ON BEHALF OF FINE, KAPLAN & BLACK, R.P.C.

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17 I, Roberta D. Liebenberg declare as follows:

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19 1. I am a member of Fine, Kaplan & Black, R.P.C. (the "Firm"). I submit this Declaration
20 in support of class counsels' application for attorneys' fees for services rendered to the proposed class
21 and for reimbursement of expenses reasonably incurred in the course of such representation. I make
22 this Declaration pursuant to 28 U.S.C. § 1746. The time expended in preparing this Declaration is not
23 included in the application for attorneys' fees.

24 2. I have reviewed the Court's October 31, 2014 Order Appointing Interim Lead Class
25 Counsel (ECF No. 319) ("Order"), including in particular the Order's provisions regarding fees, costs,
26 and expenses. The Firm has adhered to those provisions.

27 3. The Firm has acted as class counsel to the Direct Purchaser Class (the "Class") in this
28 class action. Since we submitted our last declaration in support of an award of attorneys' fees and

1 reimbursement of expenses, the Firm has been involved in the following activities on behalf of the
2 Class at the request and under the direction of Lead Counsel: (a) researching and drafting briefs in
3 support of Plaintiffs' motions *in limine* and in response to Defendants' motions *in limine*; (b) preparing
4 Plaintiffs' deposition designations and objections and counters to Defendants' deposition designations;
5 (c) researching and drafting proposed jury instructions; (d) briefing proposed jury instructions; and (e)
6 reviewing exhibits in preparation for trial.

7 4. During the period from January 1, 2020 through March 31, 2022, the Firm performed
8 304.6 hours of work in connection with this litigation. Based upon the historical hourly rates charged
9 by the Firm, the lodestar value of the time is \$ 184,885.50. Attached as **Exhibit A** is a chart that
10 indicates the attorneys, paralegals and staff who worked on this litigation, the number of hours worked,
11 the categories of their work, and their respective lodestar values. Exhibit A was prepared from
12 contemporaneous, daily time records regularly prepared and maintained by the Firm, and they have
13 been provided to Lead Counsel for review.

14 5. All of the services performed by the Firm in connection with this litigation were
15 reasonably necessary in the prosecution of this case. There has been no unnecessary duplication of
16 services for which the Firm now seeks compensation. The lodestar calculations exclude time spent
17 reading or reviewing work prepared by others or other information concerning this case unless related
18 to preparation for, or work on, a matter specifically assigned to the Firm by Lead Counsel. The rates at
19 which the Firm seeks compensation are its usual and customary hourly rates charged for similar work.

20 6. Attached as **Exhibit B** is a chart summarizing \$400,605.81 of reasonable and necessary
21 expenses the firm has incurred during the period January 1, 2020 through March 31, 2022 in
22 connection with this litigation for which it has not yet been reimbursed. Expense documentation has
23 been provided to Lead Counsel for audit and review.

24 7. The expenses incurred are reflected on the books and records of the Firm. These books
25 and records are prepared from checks and expense vouchers that are regularly kept and maintained by
26 the Firm and accurately reflect the expenses incurred.

27 8. The Firm's compensation for the services rendered on behalf of the class is wholly
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1 contingent. Any fees and reimbursement of expenses will be limited to such amounts as approved by
2 the Court.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is true
4 and correct.

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6 Executed on:

7 Date: June 14, 2022

By: /s/ Roberta D. Liebenberg
Roberta D. Liebenberg

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Exhibit A

CAPACITORS ANTITRUST LITIGATION				
FINE, KAPLAN AND BLACK, RPC				
LODESTAR SUMMARY -- HISTORICAL RATES				
JANUARY 1, 2020 TO MARCH 31, 2022				
Attorney/Paralegal	Hours	Rate	Category	Lodestar
Roberta D. Liebenberg (M)	13.2	\$ 950.00	Written Motions and Submissions	\$ 12,540.00
	0.5	\$ 950.00	Other Trial Preparation and Support	\$ 475.00
Roberta D. Liebenberg (M)	13.7			\$ 13,015.00
				\$ -
Gerard A. Dever (M)	51.6	\$ 775.00	Written Motions and Submissions	\$ 39,990.00
	23.9	\$ 775.00	Other Trial Preparation and Support	\$ 18,522.50
	8.1	\$ 775.00	Fact Witness	\$ 6,277.50
Gerard A. Dever (M)	83.6			\$ 64,790.00
				\$ -
Adam J. Pessin (M)	27.7	\$ 725.00	Written Motions and Submissions	\$ 20,082.50
	6.8	\$ 725.00	Other Trial Preparation and Support	\$ 4,930.00
Adam J. Pessin (M)	34.5			\$ 25,012.50
				\$ -
Ria C. Momblanco (M)	12.8	\$ 625.00	Written Motions and Submissions	\$ 8,000.00
Ria C. Momblanco (M)	12.8			\$ 8,000.00
				\$ -
Mary L. Russell (A)	17.7	\$ 625.00	Written Motions and Submissions	\$ 11,062.50
	11.9	\$ 625.00	Other Trial Preparation and Support	\$ 7,437.50
Mary L. Russell (A)	29.6			\$ 18,500.00
				\$ -
Jessica D. Khan (A)	21.4	\$ 550.00	Written Motions and Submissions	\$ 11,770.00
Jessica D. Khan (A)	21.4			\$ 11,770.00
				\$ -
Joseph J. Borgia (A)	26.6	\$ 475.00	Other Trial Preparation and Support	\$ 12,635.00
Joseph J. Borgia (A)	26.6			\$ 12,635.00
				\$ -
Robert A. Larsen (A)	72.2	\$ 385.00	Other Trial Preparation and Support	\$ 27,797.00
Robert A. Larsen (A)	72.2			\$ 27,797.00
				\$ -
Nancy M. Blakeslee (PL)	4.7	\$ 330.00	Other Trial Preparation and Support	\$ 1,551.00
	0.9	\$ 330.00	Written Motions and Submissions	\$ 297.00
Nancy M. Blakeslee (PL)	5.6			\$ 1,848.00
				\$ -
Allyson L. Katzman (PL)	3.6	\$ 330.00	Other Trial Preparation and Support	\$ 1,188.00
Allyson L. Katzman (PL)	3.6			\$ 1,188.00
				\$ -
Susan J. Hufnagel (PL)	1.0	\$ 330.00	Other Trial Preparation and Support	\$ 330.00
Susan J. Hufnagel (PL)	1.0			\$ 330.00
				\$ -
TOTALS	304.6			\$ 184,885.50

Exhibit B

CAPACITORS ANTITRUST LITIGATION	
FINE, KAPLAN AND BLACK, RPC	
EXPENSE SUMMARY	
JANUARY 1, 2020 TO MARCH 31, 2022	
EXPENSE	AMOUNT
Assessments	\$ 400,000.00
In-house Copying	\$ 410.20
Research Service (Pacer)	\$ 4.70
Westlaw	\$ 190.91
TOTAL	\$ 400,605.81