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10 *Attorneys for Plaintiff State of Missouri*
11 *And Co-Liaison Counsel for States*

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

15 IN RE: TFT-LCD (FLAT PANEL)
16 ANTITRUST LITIGATION

17 Master File No. 3:07-md-1827 SI
18 MDL No. 1827

19 This Document Relates to:
20 ALL INDIRECT-PURCHASER ACTIONS
21 *State of Missouri, et al. v. AU Optronics Corporation, et al.,*
22 Case No. 10-cv-03619 SI; and
23 *State of Florida v. AU Optronics Corporation, et al.,*
24 Case No. 10-cv-3517 SI; and
25 *State of New York v. AU Optronics Corporation, et al.,*
26 Case No. 11-cv-0711

27 **SUPPLEMENTAL**
28 **DECLARATION OF ANNE E. SCHNEIDER IN SUPPORT OF**
INDIRECT-PURCHASER PLAINTIFFS' AND STATES
ATTORNEYS GENERAL'S
MOTION FOR INTERIM
REIMBURSEMENT OF
EXPENSES

Date: May 18, 2012
Time: 9:00 a.m.
Dept.: Courtroom 10, 19th Floor
Judge: The Hon. Susan Illston

29 I, ANNE E. SCHNEIDER, declare as follows:

30 I am an attorney licensed to practice law by the Missouri State Bar and am duly admitted
31 to practice before this Court on a *pro hac* vice basis. I am a duly appointed Assistant Attorney
32 General for the State of Missouri and am an attorney of record for the State of Missouri. I

33 SUPPLEMENTAL DECLARATION OF ANNE E. SCHNEIDER IN SUPPORT OF STATES ATTORNEYS
34 GENERAL'S MOTION FOR INTERIM REIMBURSEMENT OF EXPENSES
35 MDL: 3:07-md-01827 SI

1 submit this supplemental declaration in support of the Indirect-Purchaser Plaintiffs' and States
2 Attorneys General's Motion for Reimbursement of Certain Costs ("Motion for Certain Costs") to
3 respond to the requests made by the Court's Order on July 11, 2012 (Dckt No. 6128). I make
4 this declaration based on my own personal knowledge. If called as a witness, I could and would
5 competently testify to the matters stated herein.

6
7 1. I adopt by reference my earlier Declaration filed on March 14, 2012 in this action
8 in support of the Indirect-Purchaser Plaintiffs' and State Attorneys General's Motion for
9 Interim Reimbursement of Expenses. See, Declaration of Anne E. Schneider in Support
10 of States Attorneys General's Motion for Interim Reimbursement of Certain Expenses
11 (Docket No. 5159).

12 2. In my initial Declaration I provided a summary of certain costs incurred in this
13 action in the several enforcement cases filed by the States which totaled \$ 794,343.58.
14 My earlier Declaration included in Attachment "A" a list of costs shared among the
15 Attorneys General for expert-related expenses and transcripts and specifically listed each
16 bill that was paid for expert work provided for the States Attorneys General in this matter
17 by AppEcon and by Gautam Gowrisankaran, Ph.D., Professor of Economics at the
18 University of Arizona. Exhibit "A" also summarized bills paid by the State Attorneys
19 General for transcripts of depositions taken and of court hearings in this matter that were
20 purchased collectively by the State Attorneys General through their Litigation Cost Share
21 Fund. I attach hereto another copy of that Attachment "A" along a more detailed listing
22 of those billings (Attachment "A-1"), followed by copies of each of the referenced
23 underlying bills in the order that they are listed (Attachment "A-2(a)-(d)"). These bills
24 reflect the expert and analytical support work performed by Dr. Gowrisankaran and staff

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27 SUPPLEMENTAL DECLARATION OF ANNE E. SCHNEIDER IN SUPPORT OF STATES ATTORNEYS
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MDL: 3:07-md-01827 SI

1 at ApplEcon acting at his direction through 2011. The total amount of the bills reflected
2 by Exhibit "A" is \$667,778.26.

- 3 3. In my initial Declaration I included in Attachment "B" a list of certain additional
4 costs incurred by individual States for deposition transcripts and, in the case of California, for
5 additional expert services separately paid by those States in connection with their lawsuits
6 relating to this matter. I attach hereto another copy of that Attachment "B" along with an
7 expanded version of that list which separately itemizes each transcript and expert bill
8 (Attachment "B-1"). Following that list are copies of each of the referenced underlying
9 bills in the order that they are listed (Attachment "B-2"). The depositions listed were of
10 various state purchasing agents or related personnel taken by the Defendants in this
11 matter. The expert services submitted by the California Attorney General's office reflect
12 work done for that office's separate investigation and litigation against the Defendants.
13 The total amount of the bills reflected by Exhibit "B" is \$126,565.32.

- 14 4. The total costs that were submitted for an order approving payment on March 14,
15 2012 were:

16	Shared Costs of the Settling States	\$ 667,778.26
17	Individual State-Submitted Costs	<u>\$ 126,565.32</u>
18		\$ 794,343.58

19
20 These totals are reflected in the bills attached to this declaration. These bills do not
21 represent the entirety of costs incurred by the States in this matter as some additional
22 costs were incurred before this litigation was initiated as well as after the March 14, 2012
23 motion was prepared. These costs also do not include costs for attendance at various
24 court hearings and other litigation and mediation-related sessions. The remainder of
25 costs incurred by the States that were reasonable and necessary in the prosecution of the
26

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MDL: 3:07-md-01827 SI

1 actions will be submitted with similar documentation at the time the States Attorneys
2 General seek an award of their attorneys' fees and such costs.

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

5 Executed this 26th day of July, 2012, in Jefferson City, Missouri.

6
7
8 /s/ Anne E. Schneider
Anne E. Schneider