Krishna B. Narine
Meredith & Narine
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: CRT ANTITRUST LITIGATION	Master File No. CV-07-5944-SC MDL No. 1917
This Document Relates to: ALL DIRECT PURCHASER CLASS ACTIONS	**CLASS ACTION** **DECLARATION OF KRISHNA B. NARINE IN SUPPORT OF MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND INCENTIVE AWARDS**

I, Krishna B. Narine, declare and state as follows:

1. I am a member of the law firm of Meredith & Narine. I submit this declaration in support of Direct Purchaser Plaintiffs ("DPP") joint application for an award of attorney fees in connection with the services rendered in this litigation. I make this Declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Wettsteins and Sons, Inc. d/b/a Wettsteins and as counsel for the class throughout the course of this litigation. The background and experience of Meredith & Narine firm and its attorneys are summarized in the *curriculum vitae* attached hereto as Exhibit 1.

3. Meredith & Narine has prosecuted this litigation solely on a contingent fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While the Meredith & Narine firm devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, Meredith & Narine performed the following work: At the direction of lead counsel, our primary assignment was the translation and analysis of documents which were in the mandarin language.

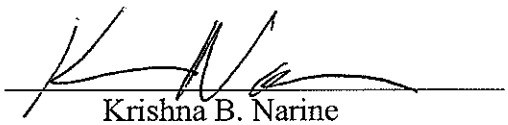
5. Attached hereto as Exhibit 2 is my firm's total hours and lodestar, computed at historical rates, from May 9, 2008 through July 31, 2014. This period reflects the time spent after the appointment of Lead Counsel in the litigation. The total number of hours spent by Meredith & Narine during this period of time was 273.50 hours with a corresponding lodestar of $96,862.50. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. The lodestar amount reflected in Exhibit 2 is for work assigned by Lead Class Counsel, and was performed by professional staff at my law firm for the benefit of the Direct Purchaser Plaintiff ("DPP") Class.

6. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit 2 are the usual and customary hourly rates charged by Meredith & Narine.

7. Meredith & Narine paid a total of $10,000.00 in assessments for the joint prosecution of the litigation against the defendants.

8. I have reviewed the time and expenses reported by my firm in this case which are included in this declaration, and I affirm that they are true and accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 22, 2015 at Philadelphia, Pennsylvania.



Krishna B. Narine

Exhibit 1

MEREDITH & NARINE

)0 S. Broad St.
ıite 905
ıiladelphia, PA 19110
ɛlephone: 215.564.5182
ıcsimile: 267.687.1628

Meredith & Narine was formed in 2012, by Joel Meredith and Krishna Narine.

Joel C. Meredith

Joel Meredith is one of the founding partners of Meredith & Narine. Prior to establishing Meredith & Narine, Mr. Meredith was a shareholder in the firm Meredith Cohen Greenfogel & Skirnick, P.C., with offices in Philadelphia and New York City. Mr. Meredith is a 1969 graduate of Villanova Law School where he was a member of the Editorial Board of the Villanova Law Review.

During more than thirty-five years of trial experience, Mr. Meredith has acted as trial counsel to major corporate defendants *Paint Products v. Dulch Roy*, Inc., 1980-2 CCH Trade Cases ¶ 63, 497 (D.Conn.1980) and to major corporate plaintiffs in complex litigation. *See Channel Home Centers Div. of Grace Retail Corp. v. Grossman,* 795 F .2d 291 (3rd Cir. 1986). He has acted, as lead or co-lead counsel in numerous class actions including, *Bagel Inn, Inc. v. All Star Dairies*, 539 F. Supp. 107 (D.N.J. 1982); *In re Carbon Dioxide Antitrust Litigation*, MDL No. 940 (M.D. Fla.); *X-Ray Film Antitrust Litigation*, No. CV 93 5904 (CPS) (E.D.N.Y.); *Potash Antitrust Litigation*, MDL No. 981 (D.Minn.); *In re Commercial Tissue Antitrust Litigation*, MDL No. 1189 (N.D.Fla.) and *In re Wholesale Grocery Antitrust Litigation*, MDL No. 2090 (D.Minn.) and has had a substantial role in numerous complex actions, including: *In re Infant Formula Antitrust Litigation*, MDL No. 878 (N.D. Fla.); *Superior Beverage/Glass Container Consolidated Pretrial*, Case No. 89 C 5251 (N.D.Ill.); *Cumberland Farms, Inc. v. Browning-Ferris Industries, Inc.*, C.A. No. 87-3717 (E.D. Pa.); *In re Chlorine and Caustic Soda Antitrust Litigation*, Master File No. 86-5428 (E.D. Pa.); *In re Industrial Gas Antitrust Litigation*, Civil No. 80 C 3479 (N.D. IlL); and *In re Drill Bits Antitrust Litigation*, Civil Action No. H-91-627 (S.D. Tx.). In re Unisys Erisa Litigation (E.D.Pa)

In *In re Plywood Antitrust Litigation*, MDL No. 159 (E.D. La. 1978), Mr. Meredith was one of the plaintiffs' trial counsel who won a jury verdict for plaintiffs on all issues. The verdict was affirmed in its entirety by the Fifth Circuit Court of Appeals and the case subsequently settled. He also acted as chief counsel and chief trial counsel to the City of Philadelphia, the State of Michigan, and the State of Michigan class of all governmental entities in *In re Cast Iron Pipe Antitrust Litigation*, C.A. No. 71-516 (N.D. Alabama 1973). After ten weeks of trial, the jury could not reach a verdict and the case was subsequently settled.

Mr. Meredith is admitted to practice in the Supreme Court of the Commonwealth of Pennsylvania and a member of the Bars of the Supreme Court of the United States, the Court of Appeals for the First, Third, Fifth and Eleventh Circuits, and the Eastern District of Pennsylvania.

Krishna B. Narine

Mr. Narine received his undergraduate degree from Dartmouth College in 1984, and received his law degree from The Georgetown University Law Center in 1987. He is one of the founding partners of Meredith & Narine. Mr. Narine is a former partner at Schiffrin & Barroway, and was the

manager of its antitrust department. Before his work with Schiffrin & Barroway, Mr. Narine was a partner at Meredith, Cohen, Greenfogel & Skirnick, P.C., a firm which specialized in complex antitrust litigation. While at Meredith Cohen, Mr. Narine was actively involved in complex antitrust litigation for over thirteen years, and played a prominent role in two of the largest antitrust cases in history:

• *In re Nasdaq Market-Makers Antitrust Litigation,* MDL No. 1023 (S.D.N.Y.) (settlement of $1.125 billion); and

• *In re Brand Name Prescription Drugs Antitrust Litigation,* C.A. No. 94C897 and MDL No. 997 (N.D. Ill.) (settlement of $750 million).

Mr. Narine also has played a prominent role in the following national antitrust class actions: *In re Commercial Tissue Antitrust Litigation,* MDL No. 1189 (N.D. Fla.); *In re Carbon Dioxide Antitrust Litigation* MDL No. 940 (M.D. Fla.); *In re Drill Bits Antitrust Litigation,* C.A. No. H-91-627 (S.D. Tex); *Cumberland Farms, Inc. v. Browning-Ferris Industries, Inc.*, C.A. No. 87-3717 (E.D.Pa.); *In re Vitamins Antirust Litigation,* MDL No. 1285 (D.D.C.) and *In re Isostatic Graphite Antitrust Litigation,* MDL No. 1857 (E.D. Pa.).

Mr. Narine is Liaison Counsel one of four Co-Lead Counsel of the indirect purchaser action in *In Re: Processed Egg Products Antitrust Litigation*, C.A. No. 08-2002, MDL No. 2002 (E.D.Pa.). Mr. Narine has a prominent role in the indirect purchaser actions in two antitrust class actions pending in the Eastern District of Pennsylvania, *In re Hydrogen Peroxide Antitrust Litigation*, MDL No. 1682, C.A. No. 05-666 (E.D.Pa.) and *In re Plastic Additives Antitrust Litigation*, MDL No. 1684, C.A. No. 05-4157, both of which are among the first indirect purchaser antitrust class actions brought in federal court under the Class Action Fairness Act. In addition, Mr. Narine has litigated class cases in state courts throughout the United States on behalf of indirect purchasers of EPDM[1] (partial settlement of $4.25 million), NBR[2] (partial settlement of $1.3 million) and Neoprene[3] (settlement of $5.6 million) as well as indirect purchaser antitrust class cases in the federal courts.[4]

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[1] *Brian A. Luscher v. Bayer AG, et al.* Case No. CV 2004-014835 (Sup. Ct. of Maricopa County, Ariz.), *Box Butte County School District (a/k/a Alliance Public Schools) v. Bayer AG, et al.* Case No. CI 04-270 (Dist. Ct. of Box Butte County, Neb.), *Investors Corporation of Vermont v. Bayer AG, et al.* Docket No. S-1011-04-CNC (Chittenden County Sup. Ct., Ver.), *Acoma, Inc. v. Bayer AG et al.* Case No. 04-4143CI-13 (Cir. Ct. for Pinellas County Fla.), *Jerome Anderson v. Bayer AG et al.* Case No. CL 95959 (Dist. Ct. for Polk County, Ia.), *Mitchell Teague v. Bayer AG et al.* Case No. 04-CVS-5525 (Sup. Ct., Guilford County, N.C.), *GT Roofing Company v. Bayer AG et al.* Case No. D-101-cv-2004-1280 (1st Jud. Dist. Ct., County of Santa Fe, N.M.), and *110-116 Terrace View Ave., Inc. v. Bayer AG et al.* Case No. 04602008 (Sup. Ct. New York County).

[2] *Brian A. Luscher v. Bayer AG, et al.* Case No. CV2005-002913 (Sup. Ct. of Maricopa County, Ariz.), *Steve Poole and Lori Poole v. Bayer AG, et al.* Case No. CI-04-270 (Dist. Ct of Morrill County, Neb.), *Christine F. Armstrong v. Bayer AG, et al.* Docket No. S-66-05CnC (Chittenden County Sup. Ct., Ver.) and *Russell & Regier Quality Painting LP v. Bayer AG, et al.* Case No. 05CV4 (Dist. Ct. Harvey County, Kan.).

[3] *Donna R. Fayette v. DuPont Dow Elastomers, LLC, et al.* Docket No. S-65-05CnC (Chittenden County Sup. Ct., Ver.).

[4] *In re: SRAM Indirect Purchaser Antitrust Litigation*, Case No. 07-md-1819 (N.D.Cal.); *In re Babies R Us Antitrust Litigation, Case* No. 06-cv-0242 (E.D.Pa.); *In re TFT-LCD Antitrust Litigation*, MDL No. 1827 (N.D.Cal.); *Oliver v. SD-3C LLC; Panasonic Corp., Panasonic Corp. of North America; Toshiba Corp.,Toshiba America Electronic Components, Inc.; and Sandisk Corp.*, Case No. 11-cv-01260 (N.D.Cal.); *In re: Automotive Wire Harness Systems Antitrust Litigation*, Case No. 12-md-02311 (E.D.Mich.); *In re: Photochromic Lens Antitrust Litigation*, 10-md-02173 (M.D.Fla.).

In addition to litigating class actions, Mr. Narine has handled commercial matters including business entity formation, purchases and sales of businesses, and real estate transactions actions. Mr. Narine is admitted to practice in the Supreme Court of the Commonwealth of Pennsylvania, and is a member of the Bars of the United States Court of Appeals for the Third Circuit and the United States District Court for the Eastern District of Pennsylvania.

Jim J. Liu

Mr. Liu has a degree in Information Science from Wuhan University in the People's Republic of China. In addition, he has a J.D. from Rutgers University School of Law and an L.L.M. in Taxation from Temple University's Beasley School of Law. Mr. Liu has extensive experience reviewing Mandarin documents for litigation and investigations that were being conducted in the United States, including cases or investigations involving the Foreign Corrupt Practices Act, intellectual property, corporate business practices, taxation, and international law.

Exhibit 2

In re Cathode Ray Tube (CRT) Antitrust Litigation
Meredith & Narine
Reported Hours and Lodestar
May 9, 2008 through July 30, 2014

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
ATTORNEYS			
Joel C. Meredith (P)	3.00	735.00	$2,187.50
Jim Liu (OC)	270.50	350.00	$94,675.00
NON-ATTORNEYS			
TOTAL:			$96,862.50

(P) Partner
(OC) Of Counsel
(A) Associate
(PL) Paralegal
(LC) Law Clerk