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18 Co-Lead Class Counsel

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN JOSE DIVISION

22 IN RE: HIGH-TECH EMPLOYEE
 23 ANTITRUST LITIGATION

24 Master Docket No. 11-CV-2509-LHK

25 THIS DOCUMENTS RELATES TO:
 26 ALL ACTIONS

27 **DECLARATION OF JAMES J. SABELLA**
 28 **IN SUPPORT OF PLAINTIFFS'**
MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND INCENTIVE AWARDS

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I, James J. Sabella, declare:

1. I am an attorney licensed to practice in the States of New York and Delaware. I am a director of Grant & Eisenhofer P.A. (“G&E”), Counsel for the Class Representatives and for the proposed Settlement Class. I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

2. G&E is one of the largest and most respected plaintiffs’ class action firms in the nation. Over the past six years, the firm has obtained recoveries totaling over \$12.5 billion for plaintiffs in cases in which the firm served as lead or co-lead counsel.

3. G&E attorneys and legal assistants have spent considerable time on the litigation of this action. G&E’s contemporaneous billing records for all personnel with at least 10 hours on the case are attached hereto as Attachment 1, and a summary of the time for each person is attached hereto as Attachment 2. Total time by such G&E personnel comes to 2,488.70 hours which, at current billing rates, amounts to \$1,429,225.50 in time charges.

4. To advance this litigation, G&E paid certain costs totaling \$178,623.71 through May 5, 2015. Those costs consisted of contributions to the joint litigation fund of Class Counsel (“Litigation Fund”) as well as costs paid separately by G&E, as set forth below. To date, G&E has been reimbursed \$177,623.71, so that the total amount of unreimbursed costs amounts to \$1,100.23.

5. The Litigation Fund was designed to pay common external costs, such as expert fees, court reporting expenses for deposition transcripts, and vendor fees for our electronic platform for review and storage of documents produced in the course of discovery. G&E contributed \$140,000 to the Litigation Fund as of May 5, 2015. Further details regarding the Litigation Fund are described in the accompanying Declaration of Kelly M. Dermody.

6. In addition, G&E paid separately 38,723.94 for certain costs that were not paid for by the Litigation Fund, including copying documents, travel, electronic computer research, faxing, and mailing charges, printing, telephone services, and other expenses. These expenses are

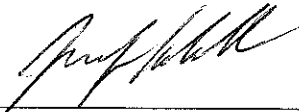
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summarized in a chart attached hereto as Attachment 3, and detailed invoices are attached hereto as Attachment 4.

7. G&E incurred the time and costs described herein on behalf of Plaintiffs on a contingent basis, and has not been reimbursed except as set forth above. The records of this time and these costs are reflected in G&E's books and records. I have reviewed the time and expenses reported by G&E in this case that are included in this motion and I affirm that they are true and accurate.

* * * *

I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in New York, NY on May 7, 2015.



James J. Sabella