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

15  
 16 IN RE: HIGH-TECH EMPLOYEE  
 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

17 **SUPPLEMENTAL DECLARATION OF**  
**KENNETH JUE**

18  
 19 THIS DOCUMENT RELATES TO:  
 20 ALL ACTIONS.

Date: July 9, 2015  
 Time: 1:30 pm  
 Courtroom: Room 8, 4th Floor  
 Judge: Honorable Lucy H. Koh

1 I, Kenneth Jue, declare:

2 1. I am employed as a project manager by Gilardi & Co. LLC (“Gilardi”), located at 3301  
3 Kerner Blvd., San Rafael, California. Gilardi serves as the Court-appointed Settlement Administrator  
4 regarding the settlement with Defendants Adobe Systems Incorporated, Apple Inc., Google Inc., and  
5 Intel Corporation (collectively, the “Settling Defendants”), as set forth in the Settlement Agreement. As  
6 the case manager at Gilardi, I oversaw the administrative services provided. I have personal knowledge  
7 of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

8 2. 56 Class Members submitted opt-out requests (55 timely, 1 late). The untimely opt-  
9 out request was submitted one day late. Those Class Members are listed in **Exhibit A**.

10 3. 11 Class Members objected to the Settlement:

- 11 a. Kenneth Caviasca (objection attached as **Exhibit B**);
- 12 b. David D. Hsu (objection attached as **Exhibit C**);
- 13 c. Loren Kohnfelder (objection attached as **Exhibit D**);
- 14 d. Prabhakar Kotla (objection attached as **Exhibit E**);
- 15 e. Dimitrios Loulourgas (objection attached as **Exhibit F**);
- 16 f. Devesh Parekh (objection attached as **Exhibit G**, supplemental statement  
17 attached as **Exhibit H**);
- 18 g. Shash Schaekar, A.K.A. Shash Basavaraju (objection attached as **Exhibit I**);
- 19 h. Albert Gordon Smith (objection attached as **Exhibit J**);
- 20 i. Delia Terra (objection attached as **Exhibit K**);
- 21 j. Eric Veach (objection attached as **Exhibit L**, supplemental statement  
22 attached as **Exhibit M**); and
- 23 k. Mark Zavislak (objection attached as **Exhibit N**).

24 4. A Class Member asked to provide an anonymous comment. That comment, with  
25 all identifying information redacted, is attached as **Exhibit O**.

26 5. On May 19, 2015, Gilardi received a comment from Nelson Minar with his opt-out  
27 request, attached as **Exhibit P**. In that comment, Mr. Minar states that he sent two emails to  
28 [info@hightechemployeelawsuit.com](mailto:info@hightechemployeelawsuit.com) (an email address Gilardi administers) one on April 29, 2015 and

1 another on May 10, 2015, and that he had not received a response. I spoke with Dean Harvey, an  
2 attorney with Class Counsel, that day regarding Mr. Minar's comment. I confirmed to Mr. Harvey that,  
3 while there was no record of an April 29, 2015 email from Mr. Minar, there was an email from Mr.  
4 Minar dated May 10, 2015 that Gilardi had not yet responded to. In that May 10, 2010 email, Mr.  
5 Minar asked how he could opt-out via email. This issue was resolved by Mr. Minar's May 19, 2015  
6 email in which he opted-out of the Settlement. On May 19, 2015, I confirmed to Mr. Harvey that  
7 Gilardi's delay in responding to Mr. Minar appeared to be an aberration, as Gilardi implemented a  
8 system to track messages and respond promptly. I also reviewed all messages Gilardi received from  
9 Class Members and confirmed that all messages asking for a response received a response.

10 6. To date, Gilardi has received 758 emails to the [info@hightechemployeelawsuit.com](mailto:info@hightechemployeelawsuit.com)  
11 email address. All emails asking for a response received a response. In addition, there have been  
12 a total of 1,822 visitors to the [www.hightechemployeelawsuit.com](http://www.hightechemployeelawsuit.com) website, and a total of 798  
13 calls to the toll free telephone number Gilardi established (888-285-0335).

14  
15 I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct and that this declaration was executed this 15th day of June, 2015, at  
17 San Rafael, California.

18 /s/ Kenneth Jue  
19 Kenneth Jue