

1 Elizabeth J. Cabraser (State Bar No. 83151)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
2 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
3 Telephone: 415.956.1000
Facsimile: 415.956.1008
4 Email: ecabraser@lchb.com

5 *Plaintiffs’ Lead Counsel and Chair of the Plaintiffs’
Steering Committee*

6 *(Plaintiffs’ Steering Committee Members Listed on
7 Signature Page)*

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 IN RE CHRYSLER-DODGE-JEEP
ECODIESEL MARKETING, SALES
12 PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 3:17-md-02777-EMC

**PRETRIAL ORDER NO. 4: PROTOCOL
FOR COMMON BENEFIT WORK AND
EXPENSES**

The Honorable Edward M. Chen

15
16 In Pretrial Order No. 3 (Dkt. No. 173), the Court appointed Plaintiffs’ Lead Counsel and
17 the Plaintiffs’ Steering Committee (“PSC”) and instructed Plaintiffs’ Lead Counsel to file a
18 protocol for common benefit and expense, addressing, among other issues, the exercise of billing
19 judgment; the maintenance of contemporaneous, detailed time records; the periodic reporting of
20 fees, expenses, and/or costs; staffing; PSC meetings; and rules for attendance at Court hearings.
21 *Id.* at 5. On June 28, 2017, Lead Counsel submitted a proposed protocol pursuant to PTO No. 3.
22 This Court has reviewed the proposed protocol and, with some modifications, adopts it as set
23 forth herein.¹

24 **I. Adoption of Case Management Protocols for Common Benefit Work**

25 The Court hereby adopts the following guidelines for the management of case-staffing,
26 timekeeping, cost reimbursement, and related common benefit issues. The recovery of common

27 ¹ Nothing in this Order shall be interpreted to affect any proceedings other than those involving
28 the authorities, duties, responsibilities, guidelines, and rules of and for Plaintiffs’ counsel, as
discussed herein.

1 benefit attorneys' fees and cost reimbursements will be limited to "Participating Counsel."
2 "Participating Counsel" shall be defined as Lead Counsel and members of the PSC (along with
3 members and staff of their respective firms), any other counsel authorized by Lead Counsel to
4 perform work that may be considered for common benefit compensation, and/or counsel who
5 have been specifically approved by this Court as Participating Counsel prior to incurring any such
6 cost or expense.

7 Eligibility does not pre-determine payment of fees and costs. If and to the extent that this
8 litigation is certified as a class action under Fed. R. Civ. P. 23 for purposes of resolution and/or
9 trial, any award of fees and costs for common benefit work will be governed by the standards and
10 procedures set forth in Rule 23, including Rule 23(h). In any event, no award or payment of
11 common benefit fees or costs shall be made without this Court's approval.

12 Participating Counsel shall be eligible to receive common benefit attorneys' fees and
13 reimbursement of costs and expenses only if the time expended, costs incurred, and activity in
14 question were (a) for the common benefit of Plaintiffs; (b) timely (as provided herein) submitted;
15 and (c) reasonable. Fees, costs, or expenses that fall within the limitations set forth herein shall
16 not be deemed presumptively reasonable, and the Court retains its discretion to evaluate any costs
17 or expenses submitted by counsel for reasonableness.

18 Participating Counsel, as defined above, shall agree to the terms and conditions herein,
19 including submitting to this Court's jurisdiction and agreeing that this Court has plenary authority
20 regarding the award and allocation of common benefit attorneys' fees and expense
21 reimbursements in this matter.

22 Lead Counsel will be responsible for collecting monthly common benefit time and
23 expense submissions from Participating Counsel, auditing such submissions for compliance with
24 the directives set forth in this Order, and informing Participating Counsel when their submissions
25 do not comply with the directives set forth in this Order. Lead Counsel's auditing responsibility
26 notwithstanding, the ultimate determination of what is compensable common benefit work, and
27 the extent or rate at which it is compensable, is within the purview of the Court.

28 In the event that Participating Counsel are unsure if the action they are about to undertake

1 is considered common benefit work, they shall ask Lead Counsel in advance as to whether such
 2 time may be compensable. Participating Counsel shall carry out only those tasks approved by
 3 Lead Counsel. Tasks that are not approved will not be compensated.

4 **A. Compensable Common Benefit Work**

5 “Common Benefit Work” includes all work done and expenses incurred that inure to the
 6 common benefit of Plaintiffs in this MDL.

7 Examples of compensable and non-compensable work include, but are not limited to:

- 8 • **Lead Counsel/PSC Meetings:** Lead Counsel and PSC members shall
 9 limit the number of conference calls and group meetings that include
 multiple counsel, and shall limit participation to indispensable attendees.
- 10 • **Consolidated Pleadings and Briefs:** (i) factual and legal research and
 11 preparation of consolidated class action complaints and related briefing;
 12 (ii) responding to inquiries from class members; (iii) communications with
 13 clients in response to Lead Counsel’s requests regarding proposed class
 representatives; (iv) comments and suggestions regarding the consolidated
 class action complaints and briefs; and (v) class-related issues and briefing
 related thereto are compensable.
- 14 • **Depositions:** While it is impracticable to impose inflexible rules to cover
 15 every conceivable situation, Lead Counsel shall exercise discretion,
 16 judgment, and prudence to designate the appropriate number of attorneys to
 participate in any given deposition commensurate with the nature of that
 17 deposition, so as to avoid over-staffing. Thus, for example, the deposition
 of a causation expert proffered by Defendants would typically justify the
 18 assignment of more attorneys than would the defense of the deposition of
 one of Plaintiffs’ fact witnesses, which would typically require one or two
 attorneys and one paraprofessional. Time and expenses for Participating
 19 Counsel not designated as one of the authorized questioners or otherwise
 authorized to attend the deposition by Lead Counsel may not be considered
 20 Common Benefit Work but, rather, considered as attending on behalf of
 such counsel’s individual clients. Unnecessary attendance by counsel may
 21 not be compensated in any fee application to the Court.
- 22 • **Periodic MDL Status Conferences:** The Court intends to hold periodic
 23 status conferences to ensure that the litigation moves forward efficiently,
 and that legal issues are resolved through formal rulings or guidance from
 the Court. Individual attorneys are free to attend any status conference held
 24 in open court to stay up-to-date on the status of the litigation, but except for
 Lead Counsel and members of the PSC authorized by Lead Counsel to
 attend (or their designees), attending and listening to such conferences is
 25 not compensable Common Benefit Work. All attorneys have an obligation
 to keep themselves informed about the litigation so that they can best
 26 represent their respective clients. Mere attendance at a status conference
 will not be considered common benefit time, and expenses incurred in
 27 relation thereto will not be considered common benefit expenses. The
 attorneys designated by Lead Counsel to address issues that will be raised
 28 at a given status conference or requested by Lead Counsel to be present at a

1 status conference are working for the common benefit, and their time will
 2 be considered for the common benefit. Similarly, any attorney whose
 3 attendance at a status conference is specifically requested by the
 4 undersigned (or by any other judge presiding over this matter or Court-
 appointed Special Master) to address a common issue may submit his or
 her time and expenses for such attendance for evaluation as Common
 Benefit Work.

- 5 • **Identification and Work-Up of Experts:** If a Participating Counsel
 6 retains an expert without the knowledge and approval of Lead Counsel,
 time and expenses attributable to the same may not be approved as
 7 Common Benefit Work. On the other hand, communications with and
 retention of experts with the knowledge and approval of Lead Counsel will
 8 be considered common benefit time, subject to the discretion of the Court.
- 9 • **Attendance at Seminars:** Except as approved by Lead Counsel,
 attendance at seminars (e.g., American Association for Justice Section
 10 Meetings, Mass Torts Made Perfect, Harris Martin, and similar seminars
 and Continuing Legal Education programs) shall not qualify as Common
 11 Benefit Work, and the expenses pertaining thereto shall not qualify as
 common benefit expenses.
- 12 • **Discovery and Document Analysis:** Only discovery and document
 13 analysis authorized by Lead Counsel and assigned to an attorney or law
 firm will be considered Common Benefit Work. If a firm/attorney elects to
 14 analyze documents that have not been assigned to them by Lead Counsel,
 that review may not be considered Common Benefit Work. Descriptions
 15 associated with “document analysis” or “document review” should contain
 sufficient detail to allow those reviewing the time entry to generally
 16 ascertain what was reviewed. The descriptions should include, for
 example, the custodian of the document, search query, and/or number of
 17 document folders reviewed.
- 18 • **Review of Court Filings and Orders:** All attorneys have an obligation to
 19 keep themselves informed about the litigation so that they can best
 represent their respective clients, and review of briefs and filings made and
 20 orders entered in this litigation is part of that obligation. Only Participating
 Counsel, and those attorneys working on assignments therefrom that
 21 require them to review, analyze, or summarize those filings or orders in
 connection with their assignments, are doing so for the common benefit.
 22 All other counsel are reviewing those filings and orders for their own
 benefit and that of their respective clients and such review will not be
 considered Common Benefit Work.
- 23 • **Emails and Correspondence:** Except for Participating Counsel appointed
 24 by the Court and their assigned attorneys and staff, time recorded for
 reviewing emails and other correspondence is not compensable unless
 25 germane to a specific task being performed by the receiving or sending
 attorney or party that is directly related to that email or other
 26 correspondence and that is for the common benefit of plaintiffs. Thus, for
 example, review of an email or other correspondence sent to dozens of
 27 attorneys to keep them informed on a matter on which they are not
 specifically working would not be compensable as Common Benefit Work.
 28

1 **B. Travel Limitations**

2 Only reasonable expenses will be reimbursed. Except in unusual circumstances approved
3 by Lead Counsel, all travel reimbursements are subject to the following limitations:

- 4 • **Airfare:** For routine domestic flights, only the price of a refundable and
5 convenient coach fare seat or its equivalent will be reimbursed. For
6 international travel or transcontinental flights with a total duration
7 exceeding four hours, business class, or if business class is not available,
8 first class, may be reimbursed at Lead Counsel's discretion. Private or
9 charter travel will not be reimbursed except in unusual circumstances, as
10 approved by Lead Counsel.
- 11 • **Hotel:** Hotel room charges for the average available room rate of a
12 reasonable business hotel will be reimbursed. Unusually high hotel
13 charges may be reviewed by Lead Counsel and disallowed.
- 14 • **Meals:** Meal expenses must be reasonable. Unusually large meal expenses
15 may be reviewed by Lead Counsel and disallowed.
- 16 • **Cash Expenses:** Miscellaneous cash expenses for which receipts generally
17 are not available (*e.g.*, tips, luggage handling) will be reimbursed up to
18 \$50.00 per trip, as long as the expenses are properly itemized.
- 19 • **Automobile Rental:** Automobile rentals must be reasonable for the date
20 and location of the rental. Unusually high car rental charges may be
21 reviewed by Lead Counsel and disallowed.
- 22 • **Mileage:** Mileage claims must be documented by stating origination point,
23 destination, and total actual miles for each trip. The rate will be the
24 maximum rate allowed by the Internal Revenue Service.

25 **C. Non-Travel Limitations**

- 26 • **Long Distance, Conference Call, and Cellular Telephone Charges:**
27 Common benefit long distance, conference call, and cellular telephone
28 charges are to be reported at actual cost.
- 29 • **Shipping, Overnight, Courier, and Delivery Charges:** All claimed
30 Common benefit shipping, overnight, courier, or delivery expenses must be
31 documented with bills showing the sender, origin of the package, recipient,
32 and destination of the package. Such charges are to be reported at actual
33 cost.
- 34 • **Postage Charges:** Common benefit postage charges are to be reported at
35 actual cost.
- 36 • **Telefax Charges:** Common benefit fax charges shall not exceed \$0.50 per
37 page.
- 38 • **In-House Photocopy:** The maximum charge for common benefit in-house
39 copies is \$0.15 per page.
- 40 • **Computerized Research – Lexis, Westlaw, or Bloomberg:** Claims for

1 Lexis, Westlaw, Bloomberg, or other computerized legal research expenses
2 should be in the actual amount charged to the firm and appropriately
3 allocated for these research services.

4 No entry should contain more than one category of expense when practical, and no entry
5 should have more than one expense category code assigned to it. If, on the same day, one person
6 incurs two expenses that fall into two different categories, then there should be two separate
7 entries for that person for that date, each with the appropriate expense description and category
8 code.

9 Similarly, when practical, no listed expense entry should include expenses incurred by
10 more than one person. If multiple people incur the same expense for the same category, then
11 generally there should be a separate entry for each person, unless a single person paid the expense
12 for multiple people.

13 Every expense entry should be as detailed and specific as reasonably practical.
14 Descriptions such as “Filing and Service Fees,” “Service of Process,” “Plane Ticket,”
15 “Investigation Fees,” “Hearing Transcript,” and “Deposition Services” are not sufficient. Every
16 entry must describe the task for which the expense was incurred in enough detail to reasonably
17 identify what the expense was, who incurred it, why it was incurred, and how it related to
18 Common Benefit Work. For example: What was filed and on behalf of whom? Who was served
19 with what document and on behalf of whom? What hearing transcript was requested and for what
20 purpose? For whom was the plane ticket purchased, for air travel from where to where, on what
21 dates of travel? (The same goes for hotels, taxis, car services, tips, meals, and any other travel-
22 related expenses.) Expense entries without sufficient detail may be rejected at Lead Counsel’s
23 discretion.

24 Attorneys shall provide receipts for all expenses. This does not mean that receipts are to
25 be provided “upon request”—it means each firm must provide receipts monthly along with their
26 expense submissions, in PDF form, not hard copy. Credit card receipts (not the monthly
27 statements) are an appropriate form of verification. Hotel costs must be proven with the full hotel
28 invoice. The description of unclaimed expenses on the invoice may be redacted.

1 **D. Common Benefit Timekeeping Protocols**

2 **1. Recording Requirements**

3 All time must be accurately and contemporaneously maintained. Participating Counsel
4 shall keep contemporaneous billing records of the time spent in connection with Common Benefit
5 Work on this MDL, indicating with specificity the hours (in tenth-of-an-hour increments) and
6 billing rate, along with a description of the particular activity (such as “conducted deposition of
7 John Doe”). Descriptions must bear sufficient detail to identify the precise task and how it related
8 to Common Benefit Work. Individuals identified in time descriptions must be described by at
9 least their first initial and last name, not by initials. “John Doe” is preferred; “J. Doe” is
10 acceptable; and “JD” is unacceptable.

11 Each time entry must be categorized using one of the categories in Exhibit A. In general,
12 when possible, a more specific category should be used in place of a more general category.
13 Under no circumstances should a submitting firm make up new categories for use in its
14 submission.

15 While the categories are generally self-explanatory, below are some further explanations
16 of some of the categories that may have the potential for the most confusion.

- 17 **1. Lead/PSC Duties (category 3)** – This category code should only be used
18 for work done by Court-appointed Lead Counsel, members of the PSC, and
19 their assigned attorneys and staff, in their capacity as Court-appointed
20 Counsel. This category should be used primarily for Court-appointed
21 Counsel’s more general or administrative responsibilities that do not fit
22 into other, more specific categories. These include, but are not limited to,
23 reviewing, analyzing, and summarizing filings and orders, or coordinating
24 and designating non-Court-appointed attorneys to conduct common-benefit
25 tasks such as document reviews, depositions, or work with experts. This
26 category should not be used by any timekeeper who is not a Court-
27 appointed Counsel or one of their assigned attorneys or staff.
- 28 **2. Administrative (category 4)** – This category should be used for internal
filing and organizational tasks, such as reviewing and downloading
documents from the ECF case docket(s), creating charts, reviewing filings
generally, updating calendars, and copying and distributing documents,
etc., whether done by an attorney or staff. Please remember that the review
of filings and orders to stay informed about the litigation is every
attorney’s obligation, and time spent on such tasks is not compensable as
Common Benefit Work for most timekeepers.
- 3. Discovery (category 8)** – Almost all common benefit discovery-related
tasks should be coded with this category. The exceptions are: document

1 analysis (which should be coded category 9), discovery-related motions or
 2 briefs (which should be coded category 12), discovery-related court
 3 appearances (which should be category 6), and preparation for and
 4 taking/defending depositions (which should be category 11).

5 **4. Document Analysis (category 9)** – For the purposes of this category, the
 6 word “document” specifically means documents or other information
 7 produced in discovery. In other words, this category is not to be used for
 8 every instance of reading a document—it is more specific than that. Only
 9 discovery document analysis specifically authorized by Lead Counsel and
 10 assigned to an attorney will be considered Common Benefit Work. Time
 11 entry descriptions for document analysis tasks should include specific
 12 details such as custodians, search query, number of document folders
 13 reviewed, or other similar details.

14 **5. Pleadings/Briefs/Pre-trial Motions/Legal Memoranda (category 12)** –
 15 All research and drafting time spent for a specific pleading, brief, motion,
 16 or similar legal writing should be coded in this category.

17 **6. Trial (category 17)** – This category is reserved solely for tasks performed
 18 during a trial.

19 **7. Miscellaneous (19)** – This is a general category that should not be used if a
 20 more specific category can be used instead. Any activities that are done in
 21 connection with or as part of a larger task like a brief, or a court
 22 appearance, or a meeting, should be categorized according to that larger
 23 task. This category should be used relatively infrequently; however, if it is
 24 used, it is critical that the description of the task be sufficiently detailed to
 25 make clear how the work was common benefit.

26 Submitting firms shall direct all questions regarding particular timekeeping categories to
 27 Lead Counsel. Under no circumstances should a submitting firm make up new categories for use
 28 in its submission.

19 **2. Hourly Rates**

20 Counsel shall record their then-present hourly rates for all attorneys and staff. Although
 21 counsel may seek an award of fees based on their hourly rate at the time a settlement or judgment
 22 is reached to account for the delay in payment,² their billing records shall be prepared and
 23 recorded at the then-present rates in monthly time reports submitted to Lead Counsel. Counsel
 24 shall not bill a rate other than their standard rates at the time the work is performed. Use of these
 25 rates does not guarantee their payment.

26 _____
 27 ² The use of a current hourly rate for all hours billed is a permissible way to account for delay in
 28 payment. See, e.g., *In re Coordinated Pretrial Proceedings in Petroleum Prods. Antitrust Litig.*,
 109 F.3d 602, 609 (9th Cir. 1997); *In re Washington Public Power Supply Systems Sec. Litig.*,
 19 F.3d 1291, 1305 (9th Cir. 1994).

1 **3. Document Analysis**

2 Lead Counsel will put out for bid any vendor services and strive to get the best services
3 for the best price without sacrificing quality. A remote document analysis system will be used to
4 avoid unnecessary travel expenses and procedures will be put in place to monitor how much time
5 is spent analyzing documents and to monitor the efficiency and quality of analysis by other firms.

6 Lead Counsel and members of the PSC may use junior associates, contract and staff
7 attorneys for initial document analysis and coding; mid-level associates, contract and staff
8 attorneys for higher level analysis and coding; and senior attorneys (including partners, as
9 necessary) for top-tier analysis and quality control. Lawyers who perform initial document
10 analysis and coding will be billed at an hourly rate consistent with the market rate for junior
11 associates.

12 **E. Common Benefit Expenses Protocol**

13 **1. Shared Costs**

14 “Shared Costs” are costs that will be paid out of the Litigation Fund administered by
15 Plaintiffs’ Lead Counsel. Each PSC member shall contribute to the Fund at times and in amounts
16 sufficient to cover Plaintiffs’ expenses for the administration of this MDL. The timing and
17 amount of each assessment will be determined by Plaintiffs’ Lead Counsel, in consultation with
18 the PSC, and each assessment will be paid within 14 days as instructed by Plaintiffs’ Lead
19 Counsel. Failure to pay assessments will be grounds for removal from the appointments made in
20 previous Court Orders or other common benefit assignments.

21 Shared Costs are costs incurred for the common benefit of Plaintiffs in this MDL as a
22 whole. No client-related costs, save certain costs relating to future cases selected as bellwether
23 cases that will be for the common benefit (e.g., related to liability and causation), shall be
24 considered Shared Costs, unless exceptional circumstances exist and are approved by later order
25 of this Court. All Shared Costs must be approved by Lead Counsel prior to payment.

26 All costs that meet these requirements and fall under the following categories shall be
27 considered Shared Costs and qualify for submission and payment directly from the Fund:

- 28 • Court, filing, and service costs related to common issues;

- 1 • Court reporter and interpreter costs for depositions;
- 2 • Document (both electronic and hard copy) depository creation, operation,
- 3 staffing, equipment, and administration;
- 4 • Lead Counsel or PSC out-of-house or extraordinary administration matters
- 5 (e.g., expenses for equipment, technology, courier services, long distance,
- 6 electronic service, photocopy and printing, secretarial/temporary staff,
- 7 meetings and conference calls, etc.);
- 8 • Legal, tax, and accountant fees relating to the Fund;
- 9 • Expert witness and consultant fees and expenses for experts whose
- 10 opinions and testimony would be generic and for the common benefit of a
- 11 substantial number of cases. There shall be no reimbursement for case-
- 12 specific experts, except for liability and causation experts in bellwether
- 13 cases, with the approval of Lead Counsel;
- 14 • Printing, copying, coding, and scanning related to the above (only out-of-
- 15 house or extraordinary firm costs);
- 16 • Research by outside third-party vendors/consultants/attorneys, approved by
- 17 Lead Counsel;
- 18 • Translation costs related to the above, approved by Lead Counsel;
- 19 • Bank or financial institution charges relating to the Fund;
- 20 • Investigative services, approved by Lead Counsel; and
- 21 • Any assessment paid by Lead Counsel, by any member firm of the PSC, or
- 22 by a non-PSC firm from whom as assessment was requested by Lead
- 23 Counsel.

24 Lead Counsel shall prepare and be responsible for distributing reimbursement procedures
 25 and the forms associated therewith. Requests for payments from the Fund for common benefit
 26 expenses shall include sufficient information to permit Lead Counsel and a Certified Public
 27 Accountant to account properly for costs and to provide adequate detail to the Court if necessary.

28 **2. Held Costs**

“Held Costs” are those that will be carried by each attorney in this MDL and reimbursed
 as and when Lead Counsel determines to do so. Held Costs are those that do not fall into the
 above Shared Costs categories but are incurred for the common benefit of all Plaintiffs in this
 MDL. No client-specific costs can be considered Held Costs, other than certain common benefit
 costs relating to class representatives and future bellwether cases at the discretion of Lead
 Counsel and the PSC. Held Costs shall be recorded in accordance with the guidelines set forth

1 herein and on the form provided as Addendum B hereto.

2 Held Costs shall be subject to the travel and administrative limitations set forth in this
3 Order.

4 **F. Protocols for Submission of Time and Expenses**

5 **1. Format**

6 For Lead Counsel to maintain all time submissions in a fully sortable and searchable
7 format, all of the time and expense submissions must be provided by submitting counsel in the
8 following format.

9 1. Counsel must use the Excel forms provided as Exhibits to this Order. This means
10 that each monthly submission will consist of one Excel file, within which there will be four
11 “sheets” (marked by tabs at the bottom): “Expense Report,” “Supplemental Expense Report,”
12 “Monthly Time Report,” and “Monthly Time Report Totals.”

13 2. In the “Monthly Time Report,” the person who performed each task should be
14 identified in the column called “Last Name, First Name” by their complete last name, a comma,
15 and their complete first name (e.g., Smith, John). Please do not use abbreviations or initials in
16 this column.

17 3. In all reports, the date must be provided in month/day/year format (e.g., 10/23/14).

18 **2. Deadlines**

19 Time submissions shall be made to Lead Counsel on a monthly basis, by deadlines and in
20 accordance with the guidelines set forth herein. The first submission is due on July 15, 2017 and
21 should include all time and expense from inception of work on Ecodiesel-FCA-emissions-related
22 litigation through June 30, 2017. After this first submission, each monthly submission should
23 include all common benefit time and expenses incurred from the first to the last day of the
24 preceding month (e.g., the submission due August 15, 2017, should contain all common benefit
25 time and expenses incurred from July 1, 2017, through July 31, 2017.

26 Although counsel should endeavor to submit all common benefit expenses incurred in a
27 certain month in the submission made on the 15th of the next month, the realities of third-party
28 billing and credit card statement schedules may make such quick expense submission difficult in

1 some circumstances. Thus submissions of “supplemental” common benefit expense reports will
2 be permitted for those expenses incurred during the previous six months that—because of
3 circumstances outside the submitting counsel’s control—could not have been submitted by the
4 deadline. Any common benefit expenses submitted more than six months in arrears may not be
5 considered or included in any compilation of common benefit expense calculation and may be
6 disallowed, except for good cause shown and with approval of Lead Counsel.

7 Supplemental submissions of common benefit time will be permitted only for good cause
8 shown and with the approval of Lead Counsel.

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10 **IT IS SO ORDERED.**

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12 Dated: July 3, 2017



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EXHIBIT A

Firm Name: _____

Date: _____

Category Name	Total Time per Category	Total Fees per Category
Lead Counsel Calls/Meeting		
PSC Calls/Meeting		
Lead Counsel/PSC Duties		
Administrative		
MDL Status Conf.		
Court Appearance		
Research		
Discovery		
Doc. Review		
Litigation Strategy & Analysis		
Dep: Prep/Take/Defend		
Pleadings/Briefs, Pretrial Motions, Legal		
Science		
Experts/Consultants		
Settlement		
Trial Prep/Bellwether		
Trial		
Appeal		
Miscellaneous		
Total:		

