UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In Re: LIQUID ALUMINUM SULFATE ANTITRUST LITIGATION	Civil Action No. 16-md-2687 (JLL) (JAD) **DECLARATION OF MIKE ROBERTS IN SUPPORT OF APPLICATION FOR ATTORNEY'S FEES AND EXPENSES**

Mike Roberts, ESQ. declares as follows:

1. I am a Managing Partner with the law firm of Roberts Law Firm (hereafter referred to as "RLF"), counsel for Central Arkansas Water, City of Siloam Springs, Springdale Water Utilities, and Beaver Water District in the above matter. In such capacity, I am fully familiar with the facts contained herein based upon my personal knowledge and the books and records kept in the ordinary course of Robert Law Firm's business. I submit this declaration in support of Class Counsel's application for an award of attorneys' fees in above-captioned action (the "Action"), as well as for reimbursement of expenses incurred by my firm in connection with the Action.

2. RLF has served as counsel for Central Arkansas Water in this Action as well as for other plaintiffs listed above. RLF began its involvement before the MDL was established, and continued working with the clients to ensure their participation in the matter. Our firm has been involved in the action as one of the law firms assigned certain specific duties by Lead Counsel and by other members of the Steering Committee, as well as working with Central Arkansas Water in responding to discovery and performing other duties of the Named Plaintiffs.

3. Roberts Law Firm specifically launched its initial investigation in this matter by interviewing market participants, interviewing clients, interviewing industry experts, analyzing

legal theories and related laws, preparing and filing its complaint(s) on behalf of its clients, and also worked with Lead Counsel and the leadership team in preparation for depositions, helping to defend deponents in depositions, client communication and counseling, drafting of complaint, pleadings and briefs, litigation strategy and analysis, court appearance, administration, document production management, discovery, and other necessary legal tasks and responsibilities.

4. The schedule attached hereto as Exhibit 1 is a summary indicating the amount of time spent by each attorney and professional support staff employee of my firm who was involved in the Action, and the lodestar calculation based on my firm's current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

5. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit 1 are the same as the regular rates that would be charged for their services in non-contingent matters and/or which have been accepted in other antitrust litigation.

6. The total number of hours expended on this Action by my firm during the Time Period is 1,783.50. The total lodestar for my firm for that period is $956,194.00 consisting of $911,314.00 for attorneys' time and $44.880.00 for professional support staff time. This includes a pre-MDL time of 350.90 hours with a corresponding lodestar of $201,066.50 and post-MDL time of 1,432.60 hours with a corresponding lodestar of $755,127.50.

7. RLF's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately, and such charges are not

duplicated in my firm's billing rates.

8. The expenses incurred in this Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred.

9. With respect to the standing of my firm, attached hereto as Exhibit 2 is a brief biography of my firm.

I hereby declare under penalty of perjury that the foregoing facts are true and correct.

Mike Roberts

Dated: March 18, 2019

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EXHIBIT 1 IN SUPPORT OF APPLICATION FOR ATTORNEY'S FEES AND EXPENSES

Reported Hours and Lodestar
Inception through January 31, 2019

Name	Position	Hours	Hourly Rate	Lodestar
April Burton	PL	147.8	$170.00	$25,126.00
Angelicia Isclaw	PL	116.2	$170.00	$19,754.00
Debra Josephson	P	66.5	$710.00	$47,215.00
Emily Neal	P	120.3	$710.00	$85,413.00
Jana Law	P	212	$525.00	$111,300.00
Jing Zhao	A	327.4	$380.00	$124,412.00
Karen Halbert	P	371.6	$710.00	$263,836.00
Mike Roberts	P	31.4	$920.00	$28,888.00
Stephanie Smith	P	323.5	$660.00	$213,510.00
Susan Fowler	A	66.8	$550.00	$36,740.00
Total		1,783.5		$956,194.00

Role Legend

P Partner
S Shareholder
SC Senior Counsel
OC Of Counsel
A Associate
LC Law Clerk
PL Paralegal
I Investigator
SA Staff Attorney
CA Contract Attorney

EXHIBIT 2
FIRM RESUME
OF
ROBERTS LAW FIRM, PA

Roberts Law Firm, P.A. is a Certified Minority Business Enterprise, and is based in Little Rock, Arkansas. The law firm has three divisions: Corporate, Intellectual Property, and Complex Class Litigation. The law firm's practice predominately involves complex class action litigation representing corporate clients to recover from defendants stemming from wrongful or illegal conduct. The firm has served as counsel for Plaintiff-Corporations in individual and class action cases, and has successfully assisted recovery of hundreds of millions of dollars for its corporate clients.

Mike L. Roberts has served as co-lead counsel in multiple complex class actions, including the following (In Re: *Microsoft Antitrust Indirect Purchaser Litigation* in Arkansas (case settled early); *In Re: Pilot Flying J Rebate* (a nationwide class action which settled within two (2) months from our initially filed complaint); *In Re: Aftermarket Automotive Sheet Metal Antitrust Third Party Purchaser Litigation*. (See below.) Mr. Roberts served as Co-Lead Settlement Class Counsel in *Ori vs*. *Fifth Third Bank* case and also served on the Plaintiffs' Steering Committee in the *Heartland Bank* data breach case. (See below.)

In addition, Mike L. Roberts is a seasoned economic developer, helping corporate clients around the globe with various business opportunities. On February 1, 2008, Governor Mike Beebe appointed Mr. Roberts to the Arkansas Economic Development Commission ("AEDC") to serve as a Commissioner. Mr. Roberts works with companies who either already have a presence in Arkansas or who are considering Arkansas or somewhere else in the United States to establish its business or manufacturing production plant. In 2015, Mr. Roberts was reappointed by Governor Asa Hutchinson to a third term on the AEDC.

Mr. Roberts is licensed in Arkansas, Florida, Tennessee, Texas, and New York. He is also licensed before the United States Supreme Court and several U.S. Federal District Courts in the U.S. The firm handles litigation in multi-states in the United States, and handles claims for corporate clients globally. Clients include corporations from Abu Dhabi, Dubai, Greece, England, Taiwan, China, Vietnam, and the United States.

Roberts Law Firm, P.A. is a Certified Minority Business Enterprise. The firm's majority owner (Mike L. Roberts) is a certified minority. The firm is a member of the NAMWOLF (The National Association of Minority and Women Owned Law Firms, Inc.) and is also a member of the National Minority Supplier Development Council, Inc.

Partial Client List

Tyson Foods Corporation, AT&T Corporation, Georgia Pacific Corporation, Home Depot Stores, Federal Express Corporation, Southwest Airlines, USA Drug Stores, Inc., Walgreens, Inc., RBX Industries, ASUSTek Computer, Inc. (Taiwan), Compal Electronics, Inc. (Taiwan), AMTRAN Technology Co., Ltd (Taiwan), Foxlink International, Inc.

Sample of Significant Cases of Roberts Law Firm

In Re: Parking Heaters Antitrust Litig., United States District Court for the Southern District of New York, Civil Action No. 15-mc-940-JG-JO (Appointed Co-Lead Interim Counsel for Direct Purchaser Plaintiffs).

In Re: Heartland Payment Systems Inc. *Customer Data Security Breach Litigation*, United States District Court for the Southern District of Texas, Civil Action No. H-09-MD-2046 (Appointed as Member of Steering Committee; case settled).

In Re: Ori vs. *Fifth Third Bank and Fiserv, Inc*., United States District Court for the Eastern District of Wisconsin, Civil Action No. 08-CV-00432 -LA. (Appointed Co-Lead Settlement Class Counsel; case settled).

National Trucking Financial Reclamation Services, LLC vs. *Pilot Corporation, Pilot Travel Centers d/b/a Pilot Flying J, et al*, United States District Court for the Eastern District of Arkansas, Case No.: 4:13-cv-00250-JMM. (Appointed Co-Lead Counsel; case settled in two months for $84 million plus injunctive relief and final approval was entered within 9 months of initially filed complaint).

AM Sheet Metal Litigation, United States District Court for the Eastern District of Wisconsin, No. 2: 11 CV 00162 - LA (Appointed Co-Lead Counsel for Indirect Purchaser Plaintiffs). (Case settled with three of four defendants)

In Re: Microsoft Antitrust Litigation: Paul Peek, D.D.S., et al. v. Microsoft Corporation, Circuit Court of Lonoke County, Arkansas, First Division, No. CV2004-480 (Co-Lead Counsel) (Order approved Final Settlement on March 6, 2007, State of Arkansas; case settled for $37 million).

In Re: U. *S*. *DRAM Antitrust Litigation*: *Bruce K*. *Burton, M D*., *P*.*A*. *Malvern Diagnostic Clinic, et al*. *v*. *Micron Technology, Inc*., *et al*., Circuit Court of Hot Springs County, Arkansas, First Division, Case No. CV-2004-226-1 (Class Counsel -Case has settled for $300 million)

In Re: Augmentin Litigation, United States District Court for the Eastern District of Virginia, No. 2:02cv442; *Ryan-House et al*. *v*. *GlaxoSmithKline et al*., United States District Court for the

Eastern District of Virginia, No. 2:02cv442 (Plaintiffs Class Counsel -case settled for $61 million .)

In Re: Nifedipine Litigation, United States District Court for the District of Columbia, No. 04-CIV- 00799 (RJL). *SAJ Distributors, Inc. v. Biovail Corporation*, United States District Court for the District of Columbia, No 04-CIV-00799 (RJL) (Plaintiffs class counsel; case settled for $40 million).

Hypodermic Products Antitrust Litigation, United States District Court for the District of New Jersey, Docket No. 05-1602 (JLL/RJH), MDL No. 1730 (Plaintiffs class counsel).

In R:e Imodium Advanced Antitrust Litigation, United States District Court Eastern District of Pennsylvania, Master File No. 02cv4093; SAJ Distributors, Inc. vs. McNeil-PPC, Inc., United States District Court for the Eastern District of Pennsylvania, Civil Action No. 02-6993 (Plaintiffs class counsel).

In Re: Oxycontin Antitrust Litigation, United States District Court for the Southern District of New York, MDL Docket No. 1603; *SAJ Distributors, Inc. et al. v. The Purdue Pharma Co. et al.*, United States District Court for the Southern District of New York, MDL Docket No. 1603 (Case settled: $25 million).

In Re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, United States District Court Eastern District of New York, Master File No. 05-MD- l 720(JG)(JO) (Plaintiffs class counsel).

In Re: Wellbutrin SR Antitrust Litigation, United States District Court for the Eastern District of Pennsylvania, Master File No. 04-CV-5525 (Case settled - $49 million).

In Re: Skelaxin Antitrust Litigation, United States District Court for the Eastern District of Tennessee, 1:J 2-md-02343-CLC (Case settled - $73 million).

In Re: Rubber Chemicals Antitrust Litigation, (filed on behalf of RBX Chemicals as individual action and settled: confidential terms).