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Co-Class Counsel for Indirect Purchaser Plaintiffs

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN FRANCISCO DIVISION**

17 IN RE KOREAN RAMEN ANTITRUST
 18 LITIGATION

Civil Action No. C-13-04115-WHO

19 **DECLARATION OF MARC G. REICH**
 20 **IN SUPPORT OF MOTION TO**
 21 **APPROVE INCENTIVE AWARDS TO**
 22 **CLASS REPRESENTATIVES**

23 THIS DOCUMENT RELATES TO:
 24 ALL ACTIONS

Date: July 10, 2019
 Time: 2:00
 Courtroom: 2, 17th Floor
 Judge: Hon. William H. Orrick

1 I, Marc G. Reich, declare as follows:

2 1. I am a partner at Reich Radcliffe & Hoover LLP, co-counsel for the Indirect
3 Purchaser Plaintiffs (“IPPs”) in this action. I submit this declaration in support of IPPs’
4 Motion to Approve Incentive Awards to Class Representatives. I have personal knowledge
5 of the facts set forth in this declaration, and, if called as a witness, could and would
6 competently testify thereto.

7 2. Among IPP counsel, I was and am the primary contact with most of the
8 class representatives. I kept them kept abreast of the progress of this action through the
9 pleading stage, class certification, summary judgment, trial, and post trial proceedings. I
10 supervised their search for relevant hard-copy and electronic documents in response to
11 Defendants’ discovery requests. I defended all class representatives who were deposed
12 and prepared them for their depositions. Defendants deposed Joyce Beamer, Ji Choi,
13 Kendal Martin, Anthony An, Eleanor Pelobello, Kenny Kang, Christina Nguyen, Thu-
14 Thuy Nguyen, Yim Ha Noble, and Charles Chung. I also prepared the class
15 representatives who testified at trial, Joyce Beamer and Ji Choi. Finally, I communicated
16 with the class representatives after trial as the IPPs prepared and filed their post trial
17 motions. Through these efforts, I am quite familiar with the time and effort the class
18 representatives put into the case.

19 3. All class representatives made substantial contributions to this case. For
20 example, Ms. Beamer testified in her April 22, 2016 deposition that, at that point in time,
21 she had spent approximately 35 hours on the case. The other class representatives who
22 were deposed made similar time contributions through the dates of their depositions. I
23 estimate that Ms. Beamer and Mr. Choi spent another 30 to 40 hours in post deposition
24 activity including traveling to and from, preparing for, and providing their trial testimony.
25 I estimate that the other class representatives who were deposed spent, at a minimum,
26 another 5 hours in post deposition activity.

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 28th day of May, 2019, in Newport Beach,
3 CA.

4 *Marc G. Reich*

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6 Marc G. Reich
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