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13
14 **UNITED STATES DISTRICT COURT**
15 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

16 IN RE: PACKAGED SEAFOOD
17 PRODUCTS ANTITRUST
18 LITIGATION
19
20 This document relates to:
21 DIRECT PURCHASER CLASS
22 PLAINTIFFS TRACK

Case No. 3:15-md-02670-DMS-MSB
MDL No. 2670

**DECLARATION OF ALLAN
STEYER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
OPENING FEE AND COSTS BRIEF**

1 I, Allan Steyer, declare as follows:

2 1. I am a partner at Steyer Lowenthal Boodrookas Alvarez & Smith LLP,
3 one of the firms that represents the Direct Purchaser Plaintiffs (“DPPs”) in the above-
4 captioned action (the “Action”). I submit this declaration in support of Lead Counsel’s
5 application for an award of attorneys’ fees for services rendered in the Action, for
6 reimbursement of expenses incurred in connection with the Action, and for Service
7 Awards for Class Representatives. I make this declaration based on my personal
8 knowledge and, if called, could testify hereto the following information.

9 2. The DPPs represent a proposed class of direct purchasers for violations
10 of the antitrust laws by the three largest domestic producers of packaged tuna
11 products—Bumble Bee Foods LLC (“Bumble Bee”), Tri-Union Seafoods LLC d/b/a
12 Chicken of the Sea (“COSI”), and StarKist Company (“StarKist”), and the relevant
13 parent companies¹ (collectively, “Defendants”). The Judicial Panel on Multidistrict
14 Litigation centralized the cases before the Southern District of California in December
15 of 2015 (*see* MDL No. 2670), after which the Honorable Janis L. Sammartino
16 appointed interim lead counsel for the DPPs, Hausfeld LLP (“Lead Counsel”), as well
17 as members of a Plaintiffs’ Steering Committee, of which my firm was included. ECF
18 No. 119. As part of the Court’s order appointing counsel, Lead Counsel was ordered
19 to “[t]o call meetings of the law firms representing the class of DPPs when deemed
20 appropriate and to assign work to these law firms[.]” *Id.*

21 3. My firm, as counsel for the DPPs, drafted pleadings, including the initial
22 complaint and the Second Amended Complaint; performed legal research and drafted
23 arguments opposing defendants’ 12b6 motions; **Pre-trial Discovery** – performed
24 extensive document review, including translating Korean language documents to
25 English; evaluated documents for review by expert witnesses; assisted in preparing

26 ¹ Defendant Dongwon Industries Co. Ltd. owns StarKist; Defendant Thai Union
27 Group owns COSI; and Defendants Lion Capital LLP, Lion Capital (Americas) Inc.,
and Big Catch Cayman LP (together, the “Lion Defendants”) owned Bumble Bee.

1 for depositions, including 30(b)(6) depositions; research regarding regulatory
2 investigation of a defendant; drafted responses to defendants' discovery requests;
3 assisted with preparation of the class certification motion; **Trial Preparation** –
4 drafted motions in limine and prepared oppositions to defendants' motions in limine;
5 prepared multiple class representatives to testify at trial; prepared trial direct
6 examinations; met with class representatives regarding the direct and cross
7 examination; read expert reports and testimony and prepared to cross-examine one of
8 defendants' expert witnesses; prepared for and attended multiple pre-trial hearings;
9 **Mediation** – attended multiple mediation sessions with Magistrate Judge Berg and
10 with private mediators.

11 4. The schedule attached hereto as Exhibit 1 is a detailed summary
12 indicating the amount of time spent by attorneys and professional support staff of my
13 firm who were involved in, and billed ten or more hours to, this Action, and the
14 lodestar calculation for those individuals based on my firm's then-current billing rates
15 (including historical rates). For personnel who are no longer employed by my firm,
16 the lodestar calculation is based on the billing rates for such personnel at the time they
17 conducted work on behalf of the DPPs. The schedule was prepared from
18 contemporaneous daily time records regularly prepared and maintained by my firm.
19 Time expended on the Action after August 23, 2024 has not been included in this
20 request. Time expended on the application for attorneys' fees and reimbursement of
litigation expenses has also been excluded.

21 5. The hourly rates for the attorneys and professional support staff of my
22 firm included in Exhibit 1 are set by lead counsel due to the circumstances of this
23 particular matter and are rates which have been accepted in other complex or class
24 action litigation.

25 6. The total number of hours reflected in Exhibit 1 is 3,670.30. The total
26 lodestar reflected in Exhibit 1 is \$1,962,111.00, consisting of \$1,935,421.50 for
27 attorneys' time and \$26,689.50 for professional support staff time.

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7. My firm’s lodestar figures are based on billing rates, which 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. As detailed in Exhibit 2, my firm is seeking reimbursement for a total of \$20,241.18 in litigation expenses incurred in connection with the prosecution of this Action from January 1, 2021 through and including August 23, 2024 (this does not include contributions to the Litigation Fund, which are described in Lead Counsel’s supporting declaration).

9. The litigation expenses reflected in Exhibit 2 are the actual incurred expenses.

10. 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.

11. My firm has reviewed the time and expense records that form the basis of this declaration to correct any billing errors. In addition, my firm has removed all time entries and expenses related to the following activities if not specifically authorized by Lead Counsel: reading or reviewing correspondence or pleadings, appearances at hearings or depositions, and travel time and expenses related thereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of October, 2024.

By: /s/ Allan Steyer
Allan Steyer

**In re Packaged Seafood Products Antitrust Litigation, MDL 2670
Steyer Lowenthal - Summary Time Report**

Name	Title	Hourly Rate	Total Hours	Total Amount
Allan Steyer	Partner	\$700	803.70	\$562,590.00
D. Scott Macrae	Senior Counsel	\$600	743.20	\$445,920.00
Jill M. Manning	Partner	\$500	27.80	\$13,900.00
Jayne A. Peeters	Senior Counsel	\$500	4.30	\$2,150.00
Jayne A. Peeters	Senior Counsel	\$350	5.30	\$1,855.00
Alexander D. Kullar	Senior Counsel	\$600	208.10	\$124,860.00
Sumee Oh	Associate	\$395	54.10	\$21,369.50
Sumee Oh	Associate	\$500	1,169.40	\$584,700.00
Kristopher M. Di Giovanni	Associate	\$340	144.60	\$49,164.00
Suneel Jain	Associate	\$390*	379.60	\$128,913.00
Rachel Rice	Law Clerk	\$220	19.80	\$4,356.00
Brittany Webb	Paralegal	\$195	53.40	\$10,413.00
Adison Marshall	Paralegal	\$240*	41.20	\$8,839.50
Rya Fishman	Paralegal	\$195	15.80	\$3,081.00
TOTAL			3,670.30	\$1,962,111.00
*Denotes fluctuation in hourly rate during earlier reporting period				

EXHIBIT 1

In re Packaged Seafood Products Antitrust Litigation, MDL 2670
Steyer Lowenthal - Summary Time Report
Jan. 1, 2021- Aug. 23, 2024

Category	Amount
Travel expenses	\$10,492.44
Court filing service	\$125.00
FedEx/courier	\$165.46
Pacer/Westlaw	\$9,233.71
Long Distance Telephone Charges	\$0.57
Other	\$224.00
TOTAL	\$20,241.18

EXHIBIT 2