

**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 W. JOSEPH BRUCKNER IN SUPPORT OF APPLICATION FOR
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES SUBMITTED ON
BEHALF OF LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

I, W. Joseph Bruckner, declare and state as follows:

1. I am a partner of the law firm Lockridge Grindal Nauen P.L.L.P. ("LGN"), counsel for the direct purchaser class and counsel for named Plaintiff, City of Rochester, Minnesota in this matter. I make this declaration based on my personal knowledge as well as the books and records kept in the ordinary course of LGN's business. If called as a witness, I could and would competently testify to the matters stated herein.

2. I submit this declaration in support of Class Counsel's application for attorneys' fees and reimbursement of expenses reasonably incurred in connection with the services rendered to date in this litigation on behalf of the class.

3. During the period April 1, 2016 through February 28, 2019, LGN has been involved in several activities on behalf of the class at the request and under the direction of Lead Counsel.

4. First, we directly represented several municipalities and other government entities, each of whom filed a lawsuit in this matter. Many of our clients were considered and vetted by Lead Counsel and the Plaintiffs' Steering Committee as potential named class representatives for the direct purchaser plaintiffs' amended and consolidated complaint. Our

client, the City of Rochester, Minnesota, ultimately was selected as a named class representative plaintiff, and at Lead Counsel's direction we continued to represent the City of Rochester throughout the litigation, for the overall benefit of the plaintiff class.

5. Also at the request of Lead Counsel, we vetted nine plaintiffs under consideration to be class representatives (in addition to our own clients). The vetting process included reviewing those plaintiffs' affected purchases, interviewing the principals of those plaintiffs, and making appropriate recommendations to Lead Counsel.

6. In addition, during that same period of April 1, 2016 through February 28, 2019, we conducted the following activities on behalf of the class at the request and under the direction of Lead Counsel: the interview of a former employee of Defendant General Chemical; creation of telephone record project to track calls among key individuals at defendant companies; review and coding of documents produced by various defendants; communications with clients, completion of client questionnaires and preparation of client interrogatory answers and client documents for production.

7. The attached Exhibit A shows my firm's total hours and lodestar, computed at current billing rates, from April 1, 2016 through February 28, 2019. The total number of hours spent by my firm during this period was 1,233.20, with a corresponding lodestar of \$535,272.50. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. The lodestar amount reflected in Exhibit A is for work assigned by Lead Counsel, and was performed by attorneys and other professional staff at my law firm for the benefit of the class during this time period. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

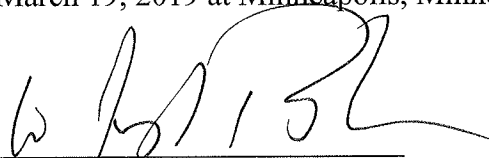
8. The hourly rates for the attorneys and professional support staff at my firm

included in Exhibit A are the usual and customary hourly rates charged by LGN in non-contingent matters and/or which have been accepted in other class action settlements.

9. For the same period of April 1, 2016 through February 28, 2019, LGN has no litigation costs and expenses that have not already been reimbursed. Exhibit B attached to this declaration shows all expenses LGN has incurred in connection with this litigation. Those expenses were reasonably necessary in the prosecution of this case and are reflected on the books and records of my firm. As noted, those expenses were previously reimbursed.

10. I have reviewed the time and expenses reported by my firm in this case which are included in this declaration, and I affirm that they are true and accurate to the best of my knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 19, 2019 at Minneapolis, Minnesota.



W. Joseph Bruckner

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EXHIBIT A

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Summary of Lodestar – Reported Hours and Current Rates

April 1, 2016 through February 28, 2019

Timekeeper	Professional Status¹	Total Hours	Current Hourly Rate	Total Lodestar
W. Joseph Bruckner	P	133.80	\$925	\$123,765.00
Charles N. Nauen	P	2.90	\$900	\$2,610.00
Heidi M. Silton	P	12.80	\$825	\$10,560.00
Brian D. Clark	P	70.00	\$625	\$43,750.00
Rachel A. Kitze Collins	A	10.00	\$500	\$5,000.00
Simeon A. Morbey	A	1.10	\$500	\$550.00
Stacy L. Cabele	CA	344.00	\$375	\$129,000.00
Nicholas R. Morgan	CA	423.60	\$375	\$158,850.00
Sherri L. Juell	PL	207.50	\$275	\$57,062.50
Josephine Nguyen	LC	5.30	\$150	\$795.00
John W. Hathaway	IT	22.20	\$150	\$3,330.00
Total:		1233.20		\$535,272.50

¹ Professional Status Abbreviations: P: Partner; OC: Of Counsel; A: Associate; CA: Contract Attorney; PL: Paralegal; LC: Law Clerk; IT: Information Technology Specialist.

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EXHIBIT B

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Expenses Incurred In This Litigation And Subsequently Reimbursed¹

April 1, 2016 through February 28, 2019

EXPENSE CATEGORY	AMOUNT INCURRED AND SUBSEQUENTLY REIMBURSED
Travel, Airfare, Transportation	\$656.89
Hotel	\$286.38
Meals	\$30.67
Filing Fees	\$1,387.00
Computer Legal Research	\$ 45.10
Telephone/Facsimile	\$95.22
FedEx	\$56.65
Litigation Fund Contribution	\$25,000.00
TOTAL:	\$ 27,557.91

¹ Lockridge Grindal Nauen PLLP has no outstanding expenses in this case which have not been reimbursed.