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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

IN RE: PACKAGED SEAFOOD
PRODUCTS ANTITRUST
LITIGATION

This document relates to:
DIRECT PURCHASER CLASS
PLAINTIFFS TRACK

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

**DECLARATION OF JASON
HARTLEY IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
OPENING FEE AND COSTS BRIEF**

1 I, Jason Hartley, declare as follows:

2 1. I am a partner at Hartley LLP, and a former partner at Stueve Siegel
3 Hanson LLP (SSH). On May 24, 2018, Hartley LLP substituted for SSH as counsel
4 for named plaintiff, Trepeco Imports, and the DPP class. See ECF 1023. I submit this
5 declaration on behalf of the time submissions of both firms, all of which I supervised,
6 and in support of Lead Counsel’s application for an award of attorneys’ fees for
7 services rendered in the Action, as well as for reimbursement of expenses incurred in
8 connection with the Action, and for Service Awards for Class Representatives. I make
9 this declaration based on my personal knowledge and, if called, could testify hereto
10 the following information.

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

23 3. My firm and former firm, Stueve Siegel Hanson LLP, as counsel for the
24 DPPs, worked on reviewing and revising the Consolidated Amended Complaints in

25 _____
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.,
28 and Big Catch Cayman LP (together, the “Lion Defendants”) owned Bumble Bee.

1 this action, analyzing and drafting motions for class certification, opposing motions
2 to dismiss, researching procedure to object to criminal fine, in-depth analysis of phone
3 records of various Defendants and research regarding their admissibility, review and
4 coding of documents produced by various Defendants, conducting and participating
5 in depositions of experts and Plaintiff Trepcu, and collection, review and analysis of
6 Plaintiff Trepcu's records and documents and preparation of same for production,
7 preparation and defense of Plaintiff depositions and regular communications with
8 Trepcu regarding case status.

9 4. The schedules attached hereto as Exhibits 1 and 2 are detailed summaries
10 indicating the amount of time spent by attorneys and professional support staff of my
11 firm and SSH, respectively, whom I supervised and who were involved in, and billed
12 ten or more hours to this Action along with the lodestar calculation for those
13 individuals based on my firm's and SSH's then-current billing rates (including
14 historical rates). For personnel who are no longer employed by my firm or SSH, the
15 lodestar calculation is based on the billing rates for such personnel at the time they
16 conducted work on behalf of the DPPs. The schedule was prepared from
17 contemporaneous daily time records regularly prepared and maintained by my firm
18 and by SSH. Time expended on the Action after August 23, 2024 has not been
19 included in this request. Time expended on the application for attorneys' fees and
20 reimbursement of litigation expenses has also been excluded.

21 5. The hourly rates for the attorneys and professional support staff of my
22 firm and SSH included in Exhibits 1 and 2 are set by lead counsel due to the
23 circumstances of this particular matter and are rates which have been accepted in other
24 complex or class action litigation and are less than our normal hourly rates.

25 6. The total number of hours for my firm, reflected in Exhibit 1, is 612.60.
26 The total lodestar reflected in Exhibit 1 is \$329,180.00, consisting of \$326,005.00 for
27 attorneys' time and \$3,175.00 for paralegal time.

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1 7. The schedule attached hereto as Exhibit 2 is a detailed summary
2 indicating the amount of time spent by attorneys and professional support staff of my
3 former firm, Stueve Siegel Hanson LLP (“SSH”), who were under my supervision at
4 the time and who were involved in and billed ten or more hours to this Action, and
5 the lodestar calculation for those individuals based on SSH’s then-current billing rates
6 (including historical rates). For personnel who are no longer employed by SSH, the
7 lodestar calculation is based on the billing rates for such personnel in his or her final
8 year of employment by SSH. The schedule was prepared from contemporaneous daily
9 time records regularly prepared and maintained by SSH. Time expended on the Action
10 after August 23, 2024 has not been included in this request. Time expended on the
11 application for attorneys’ fees and reimbursement of litigation expenses has also been
12 excluded.

13 8. The total number of hours for SSH, reflected in Exhibit 2, is 1723.70.
14 The total lodestar reflected in Exhibit 2 is \$854,611.00, consisting of \$839,490.50 for
15 attorneys’ time and \$15,120.50 for paralegal time.

16 9. My firm’s and SSH’s lodestar figures are based on billing rates, which
17 do not include charges for expense items. Expense items are billed separately and
18 such charges are not duplicated in my firm’s billing rates.

19 10. As detailed in Exhibit 3, my firm is seeking reimbursement for a total of
20 \$21.46 in litigation expenses incurred in connection with the prosecution of this
21 Action from January 1, 2021 through and including August 23, 2024 (this does not
22 include contributions to the Litigation Fund, which are described in Lead Counsel’s
23 supporting declaration). The litigation expenses reflected in Exhibit 3 are the actual
24 incurred expenses.

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

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

8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct. Executed this 2nd day of October, 2024
10 at San Diego, California.

11
12 s/ Jason Hartley
13 Jason Hartley
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Exhibit 1

**In re Packaged Seafood Products Antitrust Litigation, MDL 2670
Hartley LLP - Summary Time Report**

Name	Title	Hourly Rate	Total Hours	Total Amount
Fiona Hartley	Attorney	\$265	110	\$29,150.00
Jason Hartley	Attorney	\$700	218.4	\$152,880.00
Jason Lindner	Attorney	\$700*	263.2	\$139,825.00
Jessica Servais	Attorney	\$500	8.3	\$4,150.00
Tina Glover	Paralegal	\$250	12.7	\$3,175.00
TOTAL			612.60	\$329,180.00
*Denotes fluctuation in hourly rate during earlier reporting period				

Exhibit 2

In re Packaged Seafood Products Antitrust Litigation, MDL 2670
Stueve Siegel Hanson - Summary Time Report

Name	Title	Hourly Rate	Total Hours	Total Amount
Kearns, Julie	Associate	\$500	122.6	\$61,300.00
Moore, Austin	Associate	\$415	0.2	\$83.00
Vaglio, James	Associate	\$425	5.2	\$2,210.00
Lindner, Jason	Of Counsel	\$600	258.4	\$155,040.00
Hartley, Jason	Partner	\$700	491.2	\$343,840.00
McGhie, John	Associate	\$350	133.6	\$46,760.00
Marshall, Kate	Associate	\$350	140.4	\$49,140.00
DeMoss, Lori	Staff	\$225	0.2	\$45.00
Wise, Michael	Associate	\$350	1.3	\$455.00
Marquart, Mary Rose	Paralegal	\$275	1.9	\$522.50
Cooper, Matt	Associate	\$350	77.8	\$27,230.00
Siegel, Norman	Partner	\$700	0.4	\$280.00
Walters, Stephanie	Associate	\$350	85.9	\$30,065.00
Six, Stephen	Partner	\$700	2.3	\$1,610.00
Cooper, Sean	Associate	\$425*	342.9	\$121,477.50
Glover, Tina	Paralegal	\$245	59.4	\$14,553.00
TOTAL			1,723.70	\$854,611.00
*Denotes fluctuation in hourly rate during earlier reporting period				

Exhibit 3

In re Packaged Seafood Products Antitrust Litigation, MDL 2670
Hartley LLP - Summary Expense Report
Jan. 1, 2021- Aug. 23, 2024

Category	Amount
Online Research	\$21.46
TOTAL	\$21.46