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6 *Counsel for Plaintiff Benjamin Foods LLC and*  
7 *Member of Direct Purchaser Plaintiffs' Steering Committee*

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

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12 IN RE: PACKAGED SEAFOOD  
13 PRODUCTS ANTITRUST  
LITIGATION

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

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**DECLARATION OF SAMI H.  
RASHID IN SUPPORT OF DIRECT  
PURCHASER PLAINTIFFS'  
OPENING FEE AND COSTS BRIEF**

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16 This document relates to:  
17 DIRECT PURCHASER CLASS  
PLAINTIFFS TRACK

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1 I, Sami H. Rashid, declare as follows:

2 1. I am a partner at Quinn Emanuel Urquhart & Sullivan & LLP (“Quinn  
3 Emanuel”), one of the firms that represents the Direct Purchaser Plaintiffs (“DPPs”)  
4 in the above-captioned action (the “Action”). I submit this declaration in support of  
5 Lead Counsel’s application for an award of attorneys’ fees for services rendered in  
6 the Action, for reimbursement of expenses incurred in connection with the Action,  
7 and for Service Awards for Class Representatives. I make this declaration based on  
8 my personal 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 companies<sup>1</sup> (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. Quinn Emanuel, as counsel for the DPPs:

- 22 a. Assisted with the the development of and revisions to the  
23 Consolidated Amended Complaint and subsequent complaints;  
24 b. Provided legal research, revisions and guidance on key  
25 substantive briefing, including on the opening motions to dismiss

26 <sup>1</sup> 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.

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- and the class certification briefing;
- c. actively participated in discovery efforts. As part of such efforts, I personally took three Defendant depositions. Quinn Emanuel was also actively involved in the review, analysis, and synthesis of Defendants’ documents, as well as the review of named plaintiff Benjamin Foods’ documents for production. Quinn Emanuel also participated in the preparation of written discovery in the litigation as well as in certain negotiations with Defendants concerning the scope of discovery;
- d. conducted legal research and providing strategic input at the request of Lead Counsel. Among such efforts, Quinn Emanuel partners Eric Winston and Victor Noskov, bankruptcy litigation specialists, provided guidance to Lead Counsel at the preliminary stages of Bumble Bee’s bankruptcy process; and
- e. participated in meetings of the Plaintiffs’ Steering Committee.

4. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by attorneys and professional support staff of Quinn Emanuel who were involved in this Action from March 24, 2016 through August 23, 2024, and the lodestar calculation for those individuals based upon standardized rates that Lead Counsel directed firms to employ for purposes of this submission. The rates reflected in Exhibit 1 do *not* reflect Quinn Emanuel’s then-current billing rates (including historical rates). Apart from the rates employed, the schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm. Time expended on the Action after August 23, 2024 has not been included in this request. Time expended on the application for attorneys’ fees and reimbursement of litigation expenses has also been excluded.

5. The total number of hours reflected in Exhibit 1 is 3,144 hours. The total lodestar reflected in Exhibit 1 is \$1,338,199.00, consisting of \$1,313,335.00 for

1 attorneys' time and \$24,864.00 for professional support staff time.

2 6. My firm's lodestar figures are based on billing rates, which do not  
3 include charges for expense items. Expense items are billed separately and such  
4 charges are not duplicated in my firm's billing rates. Moreover, Quinn Emanuel is  
5 not seeking reimbursement of litigation expenses because the firm incurred no such  
6 expenses in the Action during the period from January 1, 2021 through and including  
7 August 23, 2024.

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

13 I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct. Executed this 3rd day of October,  
15 2024.

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17 By:   
18 Sami H. Rashid

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# Exhibit 1

**quinn emanuel urquhart & sullivan, llp**

Time Report - Reporting Period: 3/24/16-8/23/24

Name	Title	Total Hours	Standardized Hourly Rate*	Total Amount
Stephen R. Neuwirth	(P)	4.80	700.00	3,360.00
Eric D. Winston	(P)	2.70	700.00	1,890.00
Adam B. Wolfson	(P)	0.30	700.00	210.00
Julia J. Peck	(C)	10.80	600.00	6,480.00
Sami H. Rashid	(P)	299.30	700.00	209,510.00
Sami H. Rashid	(A)	39.40	500.00	19,700.00
Richard T. Vagas	(C)	292.80	600.00	175,680.00
Victor Noskov	(A)	60.70	500.00	30,350.00
Monica E. Tarazi	(A)	15.80	500.00	7,900.00
Joseph N. Kiefer	(A)	262.40	500.00	131,200.00
Diana Peng	(ATT)	629.20	350.00	220,220.00
Matthew Barnard	(ATT)	302.70	350.00	105,945.00
Kimberly Moore	(ATT)	121.70	350.00	42,595.00
Sharon Agami	(ATT)	46.00	350.00	16,100.00
Tony Ngo	(ATT)	173.60	350.00	60,760.00
David Draisin	(ATT)	336.90	350.00	117,915.00
Jamie L. Berardino	(ATT)	75.10	350.00	26,285.00
Elizabeth Walker	(ATT)	120.50	350.00	42,175.00
Alcides Mulgrave	(ATT)	66.30	350.00	23,205.00
Derek Hoss	(ATT)	117.30	350.00	41,055.00
Lena Valentin	(ATT)	88.00	350.00	30,800.00
Ian Ibarra	(PL)	48.00	320.00	15,360.00
Janine Miller-Cherington	(PL)	21.80	320.00	6,976.00
Caitlin Garvey	(PL)	7.90	320.00	2,528.00
Total:		<u>3,144.00</u>		<u>1,338,199.00</u>

Legend:

- (P) = Partner
- (C) = Of Counsel
- (A) = Associate
- (ATT) = Attorney
- (LC) = Law Clerk
- (PL) = Paralegal
- (O) = Other

\* As set forth in the accompanying declaration, this does not reflect Quinn Emanuel's hourly rates.