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Jacob A. Walker (SBN 271217)
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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 JACOB A.
WALKER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS’
OPENING FEE AND COSTS BRIEF**

1 I, Jacob A. Walker, declare as follows:

2 1. I am a partner at Block & Leviton LLP, one of the firms that represents
3 the Direct Purchaser Plaintiffs (“DPPs”) in the above-captioned action (the “Action”).
4 I submit this declaration in support of Lead Counsel’s application for an award of
5 attorneys’ fees for services rendered in the Action, for reimbursement of expenses
6 incurred in connection with the Action, and for Service Awards for Class
7 Representatives. I make this declaration based on my personal knowledge and, if
8 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, reviewed documents, reviewed and
22 analyzed phone records, drafted discovery motions, conducted legal research,
23 communicated with lead counsel and other members of the steering committee,
24 attended status conferences, drafted discovery, and performed other tasks related to
25 this litigation.

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 4. The schedule attached hereto as Exhibit 1 is a detailed summary
2 indicating the amount of time spent by attorneys and professional support staff of my
3 firm who were involved in, and billed ten or more hours to, this Action, and the
4 lodestar calculation for those individuals based on rates set by lead counsel, which are
5 lower than my firm's then-current billing rates (including historical rates). The
6 schedule was prepared from contemporaneous daily time records regularly prepared
7 and maintained by my firm. Time expended on the Action after August 23, 2024 has
8 not been included in this request. Time expended on the application for attorneys'
9 fees and reimbursement of litigation expenses has also been excluded.

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

14 6. The total number of hours reflected in Exhibit 1 is 2,578.4. The total
15 lodestar reflected in Exhibit 1 is \$1,342,988, consisting of \$1,334,730 for attorneys'
16 time and \$8,258 for professional support staff time.

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

20 8. As detailed in Exhibit 2, my firm is seeking reimbursement for a total of
21 \$231.86 in litigation expenses incurred in connection with the prosecution of this
22 Action from January 1, 2021 through and including August 23, 2024 (this does not
23 include contributions to the Litigation Fund, which are described in Lead Counsel's
24 supporting declaration).

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

27 10. The expenses incurred in this Action are reflected on the books and
28 records of my firm. These books and records are prepared from expense vouchers,

1 check records, and other source materials and are an accurate record of the expenses
2 incurred.

3 11. 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.

10 By:  _____
11 Jacob A. Walker

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Exhibit 1

In re Processed Seafood Products
 Block & Leviton Time & Expenses
 March 24, 2016 through August 23, 2024

Timekeeper	Role	Hourly Rate	Hours	Lodestar
Jordy, Brooke*	PL	\$ 235.00	17.8	\$ 4,183.00
Davey, Elizabeth*	PL	\$ 250.00	16.3	\$ 4,075.00
Langsen, Erica*	A	\$ 500.00	45.3	\$ 22,650.00
Gray, Jeff	A	\$ 500.00	2033.5	\$ 1,016,750.00
Smith, Matt*	A	\$ 500.00	53.9	\$ 26,950.00
Teti, Stephen*	A	\$ 500.00	98.7	\$ 49,350.00
Street, Whitney*	P	\$ 700.00	312.9	\$ 219,030.00
Totals			2578.4	\$ 1,342,988.00

PL = Paralegal; A = Associate; P = Partner

Exhibit 2

In re Processed Seafood Products
Block & Leviton Time & Expenses
January 1, 2021 through August 23, 2024

Expense Category				Amount
Delivery/Courier Service				\$ 231.86
Total Expenses				\$ 231.86