

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

IN RE: POOL PRODUCTS DISTRIBUTION
MARKET ANTITRUST LITIGATION

MDL DOCKET NO. 2328

SECTION: R(2)

This document relates to:

CHIEF JUDGE VANCE
MAG. JUDGE WILKINSON

ALL DIRECT PURCHASER CASES

**DECLARATION OF LEONARD A. DAVIS IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS’ MOTION FOR REIMBURSEMENT OF EXPENSES**

I, Leonard A. Davis, declare:

1. I am a member of the law firm Herman, Herman & Katz, L.L.C (“HHK”) and one of the attorneys at my firm responsible for handling this case. My partner Russ Herman was appointed to the Plaintiffs’ Executive Committee for Direct Purchaser Plaintiffs in the above captioned action, along with Ronald Aranoff from Bernstein Liebhard LLP, Robert Kaplan from Kaplan Fox & Kilsheimer LLP, and Jay Himes from Labaton Sucharow LLP (collectively “Class Counsel”).¹ On October 1, 2014, the Court issued an Order [R. Doc. 486] allowing me to assist in the duties of Plaintiffs’ Liaison Counsel for the Direct Purchaser Plaintiffs in this litigation.

2. I submit this declaration in support of Direct Purchaser Plaintiffs’ Motion for Reimbursement of Expenses.

¹ Mr. Himes was substituted for Hollis Salzman when she left Labaton Sucharow LLP.

3. Since the inception of the case, as ordered by the Court in PTO No. 9, my firm, HHK, is responsible for maintaining the Direct Purchaser Plaintiffs' litigation fund for this matter. See PTO No. 9 at 4 (R. Doc. 119).

4. HHK has maintained all receipts for reimbursable shared expenses of the Direct Purchaser Plaintiffs, as defined by PTO No. 9, during the course of the litigation.

5. HHK is responsible for paying the vendors for Direct Purchaser Plaintiffs' shared expenses once they have been reviewed, pursuant to PTO No. 9, by the Court appointed accountant Philip Garrett, CPA.

6. As of December 31, 2014, the shared expenses incurred by the Direct Purchaser Plaintiffs totals \$3,237,618.30.

7. As December 31, 2014, Direct Purchaser Plaintiffs have paid a total of \$1,588,781.35 of the \$3,237,618.30 of incurred shared expenses. There remains \$1,648,836.95 of unpaid shared expenses incurred by the Direct Purchaser Plaintiffs as of December 31, 2014. These unpaid expenses include \$1,492,277.70 for experts, \$142,858.29 for court reporting services, and \$13,700.96 for the discovery vendor. Additional shared expenses of the Direct Purchaser Plaintiffs have been incurred since January 1, 2015, all of which have or will be processed through Philip Garrett in accordance with PTO No. 9.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 12, 2014

/s/ Leonard A. Davis
Leonard A. Davis