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11 *Co-Class Counsel for Plaintiff and the Class*

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Superior Court of California
County of Los Angeles

FEB 02 2018

*Sherri R. Carter, Executive Officer/Clerk
By: Maria Aguirre, Deputy*

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST**

14 STANLEY DONEN FILMS, INC.,

15 Plaintiff,

16 vs.

17 TWENTIETH CENTURY FOX FILM
18 CORPORATION, and DOES 1-100,

19 Defendants.

CASE NO. BC499181 (related to BC499179,
BC499180, BC499182, BC500040)

CLASS ACTION

**DECLARATION OF NEVILLE L.
JOHNSON IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: April 9, 2018
Time: 9:00 a.m.
Dept.: 323

Assigned to the Hon. Elihu Berle
(Dept. CCW-323)

1 I, Neville L. Johnson, declare:

2 1. I am a partner in the law firm of Johnson & Johnson LLP, one of the attorneys of
3 record for Plaintiff Concourse Productions, Inc. (“Plaintiff”) and the proposed Class. I am an
4 attorney duly admitted to practice before this Court and am a member in good standing of the
5 State Bar of California.

6 2. I am one of the attorneys principally responsible for the handling of this matter at
7 Johnson & Johnson LLP. I am personally familiar with the facts set forth in this declaration. If
8 called as a witness I could and would competently testify to the matters stated herein. I make this
9 declaration in support of Plaintiff’s Motion for Final Approval of Class Action Settlement and
10 Attorneys’ Fees, Costs, and Service Awards.

11 **A. Background and Experience**

12 3. The attorneys of Johnson & Johnson LLP have been involved in litigating, trying,
13 and settling dozens of entertainment and consumer class action cases in California and elsewhere.
14 Johnson & Johnson LLP has an office in Beverly Hills, California.

15 4. Attached hereto as **Exhibit A** is a true and correct copy of the firm resume for
16 Johnson & Johnson LLP, which reflects the experience and accomplishments of the firm and the
17 attorneys working on this case. This firm resume reflects that the attorneys in this case have
18 successfully adjudicated some of the largest and most important class action lawsuits in the United
19 States.

20 5. As more fully set forth in **Exhibit A**, some of the significant entertainment and
21 consumer class action cases in which Johnson & Johnson LLP attorneys have served as class
22 counsel or had prominent roles include the following:

23 a. *Fears v. Wilhelmina, et. al.*, Case No. 02-CV-4911 (S.D.N.Y.). My firm
24 pioneered a class action lawsuit against the major New York model agencies (including Ford
25 Models, Elite, Wilhelmina) on behalf of thousands of New York models for conspiring to fix
26 model commissions and other terms in violation of the Sherman Antitrust Act. The matter
27 resulted in an approximate \$25 million recovery for the models, including substantial reforms in
28 the manner in which model agencies can operate. Published Decisions: *Fears v. Wilhelmina*

1 *Model Agency, Inc.*, 2005 WL 1325297 (S.D.N.Y. Jun 06, 2005); *Fears v. Wilhelmina Model*
2 *Agency, Inc.*, 2004 WL 594396, 2004-1 Trade Cases P 74,351 (S.D.N.Y. 2004); *Fears v.*
3 *Wilhelmina Modeling Agency, Inc.*, 61 Fed. R. Evid. Serv. 1451 (S.D.N.Y. 2003). We were co-
4 lead counsel in the case.

5 b. *Ory. v. Columbia House Music Club*, U.S. District Court for the Central
6 District of California, Case No. CV02-2342SJO. My firm was co-lead counsel in a class action
7 lawsuit for copyright infringement against record clubs, Columbia House and BMG Direct, as a
8 result of their 30-year practice of paying composers of musical compositions only 75% of the
9 publishing royalties they are statutorily entitled. The matter was successful (despite that a nearly
10 identical action was dismissed by the courts 10 years earlier), resulting in a \$6.5 million settlement
11 for composers as well as industry reforms preventing this conduct in the future.

12 c. *Webb v. Directors Guild of America, Inc.*, Los Angeles Superior Court Case
13 No. BC352621. Johnson & Johnson LLP attorneys were class counsel in a class action for breach
14 of contract and conversion which caused unpaid royalties to be paid out to all the members of the
15 guild. The case was certified as a class action and settled for over \$5 million dollars.

16 d. *Osmond v. Screen Actors Guild, Inc.*, Los Angeles Superior Court Case No.
17 BC377780. Johnson & Johnson LLP attorneys were lead counsel in a class action for money had
18 and received and conversion was certified and settled for tens of millions of dollars in unpaid
19 royalties to be paid to the members of the guild.

20 e. *Richert v. Writers Guild of America West, Inc.*, Los Angeles Superior Court
21 Case No. BC352621. Johnson & Johnson LLP attorneys were lead counsel in a class action for
22 money had and received and conversion, which was certified in 2010. The case settled for one
23 hundred million dollars in unpaid foreign royalties to all members of the guild.

24 f. *In Re: Warner Music Group Corp. Digital Download Litigation*, Case No.
25 CV 12-0559. Johnson & Johnson LLP attorneys were class counsel in a class action on behalf of
26 recording artists and producers who alleged that they have been systematically underpaid royalties
27 by the record companies. The *Warner* case settled for \$13 million and received final approval.

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1 g. *Colin Higgins Productions v. Universal City Studios LLC*, Los Angeles
2 Superior Court Case No. BC499180. Johnson & Johnson LLP attorneys were court-appointed
3 class counsel in a similar class action brought against another major film studio, where the
4 plaintiffs alleged on behalf of themselves and other profit participants that the studio failed to pay
5 all of the money owed to them in connection with home video revenues. The case settled for \$25
6 million and received final approval.

7 h. *Colin Higgins Productions, LTD. v. Paramount Pictures Corporation*, Los
8 Angeles Superior Court Case No. BC499179. Johnson & Johnson LLP attorneys were court-
9 appointed class counsel in a similar class action brought against another major film studio, where
10 the plaintiffs alleged on behalf of themselves and other profit participants that the studio failed to
11 pay all of the money owed to them in connection with home video revenues. The case settled and
12 received final approval.

13 i. *Martindale v. Sony Pictures Entertainment*, Los Angeles Superior Court
14 Case No. BC499182. Johnson & Johnson LLP attorneys were class counsel in a class action
15 brought against a major film studio, where the plaintiffs alleged on behalf of themselves and other
16 profit participants that the studio failed to pay all of the money owed to them in connection with
17 home video revenues. The case settled for \$10 million and received final approval.

18 **B. Litigation and Settlement of the Action**

19 6. Throughout this case, the law firms and lawyers representing Plaintiffs and the
20 Class members worked in a collaborative and efficient manner to provide excellent representation
21 while minimizing duplication wherever possible. Plaintiffs' counsel operated as an "executive
22 committee" that considered and decided case strategy and the issues at hand, then delegated tasks
23 among Plaintiffs' counsel. For example, certain attorneys were assigned to various tasks, such as
24 drafting discovery, participating in depositions, and motion practice, whereas other attorneys were
25 assigned to research and analysis of key issues in the case. At times, attorneys from different
26 firms would join forces to jointly take on the primary responsibility of a task, and at other times,
27 one attorney would handle a task based on the assessment of the time and resources needed for the
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1 task. To avoid redundancy and unnecessary expense, to the extent possible, Plaintiffs' counsel also
2 assigned certain attorneys to appear for depositions as well as certain hearings and conferences.

3 7. During the course of this litigation, Johnson & Johnson LLP participated in each
4 facet of the case, including: (1) Pre-litigation investigation, research, interviews and preparation
5 for filing the lawsuit; (2) Drafting the relevant pleadings, including the Complaint; (3) Responding
6 to discovery on behalf of both class representatives and preparing for and attending the depositions
7 of the class representatives; and (4) Settlement related activities, including attending the mediation
8 and communicating with the class representatives regarding the settlement terms. I believe this
9 work performed contributed to the beneficial result reached for Class members in this case.

10 8. The settlement negotiations were arms-length and it took several years of litigation
11 for the parties to come to an agreement on terms for this proposed class action settlement and to
12 formalize the parties' agreement into a formal settlement agreement. Throughout these
13 negotiations, Johnson & Johnson LLP helped to develop a settlement that obtained substantive
14 monetary relief for Plaintiff and the proposed Class, as well as valuable prospective relief to
15 proposed Class Members. Counsel participated in two mediation sessions; the first was conducted
16 on June 8, 2016 with Hon. Carl J. West (Ret.), and a second session was held on April 25, 2017
17 with Hon. Terry B. Friedman (Ret.).

18 9. Based on my professional experience and my involvement in this case, and taking
19 into consideration the risks of continued litigation as compared to the relief granted by the
20 Settlement, it is my opinion that the Settlement is fair, adequate, and reasonable, and in the best
21 interests of the Class. The Settlement only calls for a *cy pres* distribution to the Motion Picture &
22 Television Fund of uncashed settlement checks does not justify the cost of a second distribution.
23 Myself and my co-counsel have carefully considered the proposed *cy pres* remedy and the goal in
24 formulating this proposal was to make a grant to an organization that represents the interests of
25 absent class members. Here, those class members are individuals who were alleged to not have
26 been paid the amounts due them for their work in the film industry over a period of decades. The
27 proposed *cy pres* recipient, the Motion Picture & Television Fund, has requested funds to support
28 and maintain long-term projects that will provide substantial benefits and a variety of services to

1 economically disadvantaged class members who worked in the entertainment industry. Neither
 2 myself nor my firm has any interests or involvement in the governance or work of the proposed cy
 3 pres recipient in this action: The Motion Picture & Television Fund.

4 **C. The Attorneys' Fees and Costs Incurred by Johnson & Johnson LLP**

5 10. The summary schedule attached as **Exhibit B** hereto, and further summarized
 6 below, together with the detailed time and lodestar records being lodged with the Court, are a true
 7 and correct reflection of the time spent by Johnson & Johnson LLP working on this case up to
 8 January 19, 2018. The summary schedule was prepared based on the lodged, contemporaneous
 9 time records of all work performed. All of the tasks performed, and the time expended, were
 10 reasonable and necessary for the prosecution and settlement of the claims of the Plaintiffs and the
 11 Class.

12 11. A summary of Johnson & Johnson LLP's lodestar calculation sorted by
 13 professionals is set forth as follows:

PROFESSIONAL	TYPE	TIME	HOURLY RATE	LODESTAR
Neville Johnson (Blended Rate)	P	95.16	\$953.54	\$90,738.87
Douglas Johnson (Blended Rate)	P	86.78	\$726.75	\$63,067.37
James Ryan (Blended Rate)	OC	11.70	\$698.34	\$8,170.58
Jordanna G. Thigpen	A	13.00	\$600.00	\$7,800.00
Nicholas Kurtz	A	43.00	\$600.00	\$25,800.00
John Fowler	A	12.72	\$450.00	\$5,724.00
Alyson C. Decker	A	3.08	\$550.00	\$1,848.00
Jennifer Ro	A	1.00	\$600.00	\$600.00
Brian Murray	A	.70	\$450.00	\$315.00
Jennifer McGrath	A	1.10	\$750.00	\$825.00
Lan P. Vu	A	.20	\$665.00	\$133.00
Aviel Dahan	A	1.00	\$450.00	\$450.00
Totals		269.44		\$205,471.82

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1 12. A summary of Johnson & Johnson LLP's lodestar calculation sorted by categories
2 of work performed is set forth as follows:

3 WORK PERFORMED	4 TIME	5 LODESTAR
6 Attorney Meeting / Strategy	7 32.79	8 \$27,405.15
9 Case Management	10 41.23	11 \$33,765.29
12 Client Meeting	13 2.20	14 \$1,876.23
15 Court Appearances	16 22.90	17 \$19,683.69
18 Discovery	19 26.72	20 \$18,873.38
21 Experts – Work or Consult	22 1.13	23 \$1,032.14
24 Research	25 38.33	26 \$26,551.64
27 Pleadings / Motions	28 43.69	\$27,432.09
Settlement	59.25	\$48,852.21
Totals	269.44	\$205,471.82

13 13. The schedule attached as **Exhibit B** and time and lodestar records lodged with the
14 Court indicate the total number of hours expended by on this case as of January 19, 2018 are
15 269.44, with a total lodestar based on historic hourly rates for that time period of \$205,471.82,
16 which was calculated based on the hourly rate in effect at the time the work was performed. I
17 estimate that my firm will spend another eight hours through the conclusion of the case.

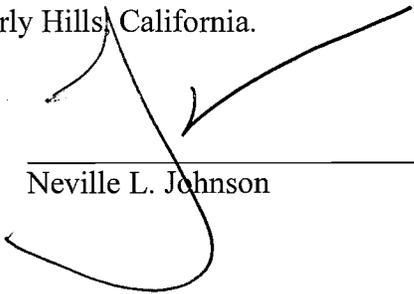
18 14. The hourly rates for the attorneys and staff identified herein at the time the work
19 was performed are commensurate with the prevailing market rates for attorneys of comparable
20 experience and skill handling complex litigation. The rates for three time-keepers are blended due
21 to their rates changing on January 1, 2015. Additionally, all reasonable attempts were made to
22 assign tasks to time-keepers at the appropriate billing rates.

23 15. Attached hereto as **Exhibit C** is a true and correct summary of expenses incurred
24 by Johnson & Johnson LLP during the course of this litigation up to January 19, 2018. The
25 expenses pertaining to this case are reflected in the books and records of my firm. This expense
26 summary was prepared based on expense vouchers, check records and other documents and is an
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1 accurate record of the expenses. **Exhibit C** indicates a total of **\$4,500.36** in expenses incurred by
2 Johnson & Johnson LLP up to January 19, 2018, in connection with the prosecution of this
3 litigation. I estimate that my firm will incur another \$150 in expenses prior to the conclusion of
4 this case for parking, mileage, messenger service fees and Case Anywhere. I believe the litigation
5 expenses incurred were reasonable and necessary given the complex nature and scope of this case.
6 In addition to the costs directly incurred and paid by Johnson & Johnson LLP, my firm maintained
7 a litigation fund where each firm contributed an amount toward costs. We have performed an
8 accounting of the fund for contributions from each firm and reimbursement of fund expenses paid
9 to each firm in the companion cases to this action. **Exhibit C** includes a list of the joint expenses
10 that all firm agreed would be paid from the litigation fund. Attached as **Exhibit D** is a true and
11 correct summary of the contributions by each firm to the fund, and the itemization of each firm's
12 share of the costs paid out of the fund. The total costs paid from the litigation fund for this case
13 total **\$39,403.10**. This includes \$2,616.10 paid by Boucher LLP, \$15,221.41 paid by PSW,
14 \$11,846.80 paid by Kiesel Law LLP and \$9,718.78 paid by Johnson & Johnson LLP. Johnson &
15 Johnson LLP and its co-counsel advanced all of the costs in this case with no promise of
16 repayment. I believe the litigation expenses incurred were reasonable and necessary given the
17 complex nature and scope of this case.

18 I declare under penalty of perjury under the laws of California and the United States of
19 America that the foregoing is true and correct.

20 Executed on January 31, 2018, at Beverly Hills, California.

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Neville L. Johnson

EXHIBIT A

JOHNSON & JOHNSON LLP

Johnson & Johnson LLP, based in Beverly Hills, California, is a litigation firm that specializes in complex litigation with a particular emphasis on privacy, entertainment, and consumer issues, including class actions in that nexus.

Neville L. Johnson graduated Phi Beta Kappa from the University of California, Berkeley (1971). He received his law degree from Southwestern Law School (1975), graduating near the top of his class. He has tried over 27 civil jury trials and over 70 civil trials and arbitrations without a jury. He is a member of the invitation-only American Board of Trial Advocates, and is on the Board of Governors of the Consumer Attorneys of Los Angeles (CAALA), the Board of Directors of the national organization Public Justice, and was on the Board of the Beverly Hills Bar Association 2013-2015 (BHBA). Johnson is a long-time member of the invitation-only Los Angeles Copyright Society, and on the Board of The California Society of Entertainment Lawyers.

He was nominated for Trial Lawyer of the Year in 2005 by CAALA. He was Co-Chair of the Entertainment Law Section of the Beverly Hills Bar Association from 2009 to 2011. He has been on the Planning Committee of the USC Entertainment Law Institute since 2011. He has appeared in courts in Arizona, Colorado, Florida, Georgia, Hawaii, Louisiana, Nevada, New York, New Jersey, New York, Oregon, Tennessee, New Mexico, Ohio, Pennsylvania, and Texas.

Mr. Johnson has practiced entertainment law and IP law since 1975 (except for 10 months in 1976-78 when he was a Public Defender in Los Angeles County and handled over 100 matters, including two murder trials and one attempted murder trial).

Mr. Johnson has represented many well-known celebrities and entertainment concerns. The firm currently represents Sylvester Stallone, one of the world's superstars, in net profit litigation which has gotten international press as the trial court has given the go-ahead for fraud and other claims. He and his firm has been lead counsel in many class actions, including pioneering class actions in the entertainment industry against the entertainment unions, major record companies and motion picture companies.

Mr. Johnson has been designated a "SuperLawyer" (top 5% as voted by colleagues) numerous times, and has been chosen to vet and approve nominations. He has been designated one of the Hollywood 100 "Power Lawyers" by the *Hollywood Reporter* every year since 2008, usually one of four litigators typically on the plaintiffs' side. In 2013, *Variety* named him one of the top 50 lawyers in entertainment, one of 16 litigators. The *Daily Journal* has twice named him one of the top 50 lawyers in entertainment. He is a Fellow of the American Bar Foundation (invitation only, top 2% in the United States).

Mr. Johnson was lead trial and appellate counsel in the precedent-setting case of *Sanders v. American Broadcasting Companies, Inc.*, 20 Cal. 4th 907 (1999), which established the right of privacy in the workplace and is studied in the leading case book on torts and the two casebooks on entertainment law. *Editor and Publisher* magazine wrote that he “is one of the most dangerous media plaintiff lawyers in the United States.”

Privacy Torts, the leading treatise on privacy law by Professor David Elder, contains the following dedication: *To Neville L. Johnson, of Johnson & Rishwain, LLP, Los Angeles, California, who has led the charge, often successfully (and always creatively and with great passion) in exposing some of the worst outrages of media newsgathering. Neville ranks with Brandeis and Warren as the great defenders of privacy. All America is in his debt.*

A law review article about his career is Richard and Calvert, “Suing the Media, Supporting the First Amendment: the Paradox of Neville Johnson and the Battle for Privacy,” 67 *Albany Law Review* 1097 (2004). On June 23, 2015, the *Los Angeles Times* did a major profile (front page, Business Section) on his career, “Contract Sport, 'Go-to' L.A. Lawyer Says Hollywood Studios Are Shortchanging His Clients,” noting that Johnson & Johnson is one of the few firms successfully taking on the entertainment establishment on a regular basis. The cover story of the July 2016, issue of *Attorney at Law* magazine was about Neville Johnson.

His published cases include: *Parsons v. Tickner*, 31 Cal.App.4th 1513 (1995) (establishing fiduciary duties in an entertainment context) and *Gerbosi v. Gaims, Weil, West & Epstein LLP*, 193 Cal.App.4th 435 (2011)(upholding denial of SLAPP motion and affirming sanctions against lawyers accused of unethical conduct in connection with notorious wiretapper Anthony Pellicano.)

He is a frequent lecturer and written extensively on entertainment, copyright and media and other legal topics, including in London, England (Entertainment attorneys based in the UK, London Branch of Entertainment Section of BHBA), Cannes, France (MIDEM, the international music convention), New York (ABA Forum on Communications Section, and Entertainment Law Section and New York Bar Assn.: Entertainment Law Section), Nashville (ABA Entertainment Law Section), Miami, Arizona State University, Stanford University, U.C. Berkeley, Loyola Law School, Southwestern Law School, USC Entertainment Law Institute annual forum as well as the undergraduate school, California Western Law School, California State University, Northridge, many times to the Entertainment Section of the BHBA as a panelist or moderator (including a recent panel on the right of publicity), and the Intellectual Property Section of Los Angeles County Bar Assn., Berklee College of Music (Boston).

Publications: Johnson & Johnson, "A New Way to Revive a Corporation?," *Los Angeles Daily Journal* (October 18, 2016); Johnson & Johnson, "Hollywood Docket: One Sided World," *27 New York State Bar Assn, Entertainment, Arts and Sports Law Journal* 32 (2016); Johnson & Elder, "Maybe America Needs More Peter Thiels," *Los Angeles Daily Journal* (August 8, 2016); "We've Lost Control," *Los Angeles Daily Journal* (June 16, 2016); "Talent Agency Act Survives Suit, Clarity Remains Elusive," *Los Angeles Daily Journal* (May 10, 2013); "The Man Who Seduced Hollywood," *36 Los Angeles Lawyer* 41 (September 2013); "Remedies for Web Defamation," *California Lawyer* 36 (May 2013); "To Find Employment as a Lawyer, You Must Market Yourself," *36 Los Angeles Lawyer* 12 (June 2013); "Ten Rules for Success in the Practice of Law," *31 Los Angeles Lawyer* 12 (June 2008); Chapter, Johnson and Aradi, "Defamatory Tweeting and Other Name and Likeness Violations" in *Building Your Artist's Brand as a Business, International Association of Entertainment Lawyers* (2012) (includes a discussion of right of publicity); Chapter, Johnson and Fowler, "Litigation: How to Draft Defensively Without Killing the Deal" in *Licensing of Music from BC to AD (Before the Change/After Digital), International Association of Entertainment Lawyers* (2014); Elder, Johnson & Rishwain, "Establishing Constitutional Malice for Defamation and Privacy/False Light Claims When Hidden Cameras and Deception Are Used by the Newsgatherer," *22 Loyola of Los Angeles Entertainment Law Review* 327 (2002); "New Developments in California Privacy and Defamation Law," *23 California Litigation* 21 (2010); Johnson & Johnson, "What Happened to Unjust Enrichment in California? The Deterioration of Equity in the California Courts," *44 Loyola of Los Angeles Law Review* 277 (2010); Johnson & Walsh, "The Danger of "Anti-Libel Tourism" Litigation in the United States," *32 Los Angeles Lawyer* 44 (December 2009); Johnson, "Privacy and the First Amendment", *California Litigation* (2006); co-author "Caught in the Act," *Los Angeles Lawyer* (1998) (an analysis of trends in the right of privacy); Johnson & Lang, 1979, *The Personal Manager in the California Entertainment Industry*, *52 Southern California Law Review* 375 (1979)(a definitive article on the regulation of talent agents, personal managers, and the interplay of entertainment unions and guilds in that nexus). He co-authored chapters on music publishing and personal managers in *The Musician's Business & Legal Guide* (2017 5th edition), and wrote the authorized and best-selling biography, *The John Wooden Pyramid of Success* (Second Edition 2004).

Since 2012, Neville and Douglas Johnson have taught a course on entertainment and media litigation as Adjunct Professors at Southwestern School of Law. From 2011-2014, he was one of the panelists teaching the Los Angeles County Bar Association new admittees course on class actions; and since 2011 he has moderated the panel on ethical issues for the annual Year in Review for the Entertainment Section of the Beverly Hills Bar Association.

Douglas L. Johnson received his Bachelor of Arts in Political Science from the University of Southern California in 1996 (Dean's List 1993-1996). Mr. Johnson received his Juris Doctorate from McGeorge School of Law in 2000 (Dean's List 1999-2000). Mr. Johnson received the top grade in Insurance Law.

Mr. Johnson has been named a Super Lawyer "Rising Star" in the area of intellectual property litigation for seven consecutive years (2005-2013). (The Rising Star Attorneys represent the Top 2.5% of their profession in Southern California for lawyers 40 years old and younger).

In 2016, Mr. Johnson was named a "Super Lawyer" in the area of intellectual property (top 5% as voted by colleagues).

Mr. Johnson specializes in entertainment, business, and class action litigation. Mr. Johnson has handled numerous high-profile and wide-reaching litigation, including music and movie royalty disputes, rights of privacy, defamation, partnership disputes, breach of contract, and class actions. Mr. Johnson has negotiated tens of millions of dollars in settlements for the firm's clients. He also secured a million dollar jury verdict for a recording artist in a copyright infringement case in Federal Court. In the past couple of years, Mr. Johnson has secured over twenty five-million dollars in settlements for the firm's clients in entertainment and business-tort cases.

Mr. Johnson specializes in right of publicity cases and represents celebrities, models, and professional athletes. Mr. Johnson regularly speaks on the subject and litigates numerous cases in this area each year.

Many of Mr. Johnson's clients are producers, actors, directors, production companies, music artists, and record labels. He is well-known for his successes in theft of idea cases for TV and reality shows and continues to litigate TV, movies, and music royalty cases. He represented Glen Larson Productions, Inc. (creator of *Magnum PI*, *Knight Rider*, *Fall Guy*, *Battlestar Galactica*) in a large scale profit participation dispute against Universal. This case recently settled after four years of litigation. Mr. Johnson also represented Ed. Weinberger in a profit participation dispute over TV show "Amen." He currently represents Richard Dreyfuss in disputes over royalties on the movies *Turner & Hooch* and *What About Bob?* Mr. Johnson also handled Mr. Dreyfuss' back-end royalty disputes on *Goodbye Girl*, *Close Encounters of The Third Kind*, *The Competition*.

Mr. Johnson represented Jack Klugman (*Quincy*, *Odd Couple*) in a profit participation dispute against Universal. He also handled Mike Connors' net profit dispute on the TV show *Mannix* and litigated a theft of idea claim against A&E and Steven Seagal over the

TV show *Lawman*. Mr. Johnson represented Ted Kotcheff in his profit-participation dispute on the film *Weekend at Bernie's*.

Mr. Johnson defended blues icon B.B. King in a claim seeking declaratory relief about the right to make a movie involving his life, resulting in the plaintiff dismissing his claim.

Mr. Johnson is currently co-counsel in class actions against the five major Hollywood studios alleging endemic underpayment on home video and new digital media for pre-1982 movies for writers, producers, actors, and directors. In the case against Universal, he was personally involved in handling the settlement for 25 million dollars.

Mr. Johnson was co-counsel the last several years in three recently settled class actions against the record industry companies over digital download royalties of underpayments to artists (Temptations/Motels/Ronee Blakely). The cases dealt head-on with unresolved points of law as to classification of digital downloads, and the rights of artists to receive royalties in the face of changing technology.

Mr. Johnson has litigated several high-profile libel actions against large media companies, recently settling one for mid-seven figures.

Mr. Johnson obtained a 10 million dollar arbitration award for his client in a business dispute.

With his partner, Neville L. Johnson, he settled three class actions against the Directors Guild of America, Writers Guild of America, and Screen Actors Guild of America for tens of millions of dollars of unpaid foreign levies.

He uncovered systematic patterns of substandard medical care, resulting in reorganization of staffing and training at a county jail, in settlement of a wrongful death and civil rights case, as featured in the cover story in *Sacramento News & Review*. The case settled for seven figures and was the largest settlement in the nation at the time for a jail suicide case.

Mr. Johnson is outside general counsel for Worldstarhiphop, a popular online music and pop culture website, where he deals daily with cutting-edge copyright, right of privacy, and right of publicity issues.

Mr. Johnson has contributed to, authored, and argued appeals before the California Court of Appeals and the United States Court of Appeals for the 9th Circuit.

Publications:

- Douglas L. Johnson & Neville L. Johnson, *What Happened to Unjust Enrichment in California? The Deterioration of Equity in the California Courts*, Loyola of Los Angeles Law Review Vol. 44:277, Fall 2010.
- *Hollywood Docket: One-Sided World*. Entertainment, Arts, and Sports Law Journal, New York Bar Association Publication, Summer 2016, Vol. 27, No. 2.
- *A New Way to Revive a Corporation*, Los Angeles Daily Journal (October 26, 2016).

Published Cases:

- *Gerbosi v. Gaims, Weil, West & Epstein, LLP* (2011) 193 Cal.App.4th 435
- *Walker v. Geico General Ins. Co.* (9th Cir. 2009) 558 F.3d 1025

Speaking Engagements:

- Panelist for Beverly Hills Bar Association, Entertainment Law Section, The Right of Publicity: The State of The Current Law (March 2014)
- Panelist for Beverly Hills Bar Association, Entertainment Law Section, “Right of Publicity: How Much Is Your Client Really Worth?” (March 2012)
- Panelist for Donald L. Stone’s Inn of St. Ives: “The Ever-Evolving Courtroom Drama of Net Profits” (2012)
- Panelist for Beverly Hills Bar Association, Entertainment Law Section, “Current Issues in Right of Likeness, Defamation and Privacy” (July 2011)
- Panelist for Loyola Law School’s Legal Symposium, Injuries Without Remedies (March 2010)

Adjunct Professor:

- Southwestern School of Law: Entertainment and Media Litigation (Spring 2012 to present)

Mr. Johnson has been lead counsel in the following class actions *Webster v. Allstate Insurance Company*, *Progressive Casualty Insurance Company*, *Walker v. Geico*, *Bouchard v. Optometrix*, *Miller v. City of Los Angeles*, et al., *Russo v. City of Beverly Hills*, *Weber v. Bank of America*, *Galavis v. LA Models*, *Armuth v. Linton* and directly involved in each class action cases listed below.

James T. Ryan is Of Counsel to Johnson & Johnson LLP. He received a Bachelor of Arts in Journalism with Honors and a Bachelor of Arts in Speech Communications from Indiana University in 1997. Mr. Ryan received his Juris Doctorate from Pepperdine University School of Law in 2000 (Dean's List 1998-1999). Mr. Ryan received the highest grade in Communications Law.

Mr. Ryan specializes in entertainment, business, and class action litigation. Mr. Ryan has handled numerous cases involving rights of privacy, defamation, copyright infringement, theft of idea, professional negligence and partnership disputes.

He has tried seven jury trials in state and federal court, participated in three binding arbitrations, and argued seven times to the California Court of Appeal and Ninth Circuit Court of Appeals. In 2004, he obtained a \$15,000,000 verdict with Neville Johnson in the Los Angeles Superior Court in a breach of fiduciary duty case involving two business partners. In 2014, he successfully defended accomplished television writer Ed Weinberger (*Taxi*, *Mary Tyler Moore*, *Amen*) in the United States District Court against claims for copyright infringement and theft of idea involving a television show airing on the TV One network. In 2015, he obtained a unanimous reversal in the California Court of Appeal for Mr. Weinberger on a case involving professional negligence of business managers (*Weinberger v. Freedman Broder & Company Acct'y. Corp.*, 2015 WL 2129499).

Mr. Ryan has acted as lead counsel for the firm on several individual cases that have settled for more than \$16,000,000. In addition, Mr. Ryan has been involved in almost all of the class actions listed below.

Published decisions:

- *Long v. Walt Disney Co.*, 116 Cal.App.4th 868 (2004)
- *Turnbull v. American Broadcasting Cos.*, 32 Media L. Rep. 2442 (C.D. Cal. 2004)

Jordanna G. Thigpen, Senior Counsel for Johnson & Johnson LLP, has a diverse legal background including service for the government, private, and nonprofit sectors. Ms. Thigpen specializes in complex entertainment and business disputes of all types, with an emphasis on contract and intellectual property matters and consumer class actions. She

received a Bachelor of Arts in U.S. History from the University of California at Davis, and went on to receive her J.D. from the University of San Francisco School of Law while operating a successful small business with locations in San Francisco and Las Vegas, Nevada, and while serving as a Commissioner for the City of San Francisco's Small Business Commission. She received many honors at the University of San Francisco, including the Edward J. McFetridge Award for Excellence in Advocacy and an award from her class for her service and contributions to their experience during school. Ms. Thigpen spent five years in service to the City and County of San Francisco, including clerking for two years for the Honorable Ronald Evans Quidachay of the San Francisco Superior Court's Law and Motion Department, and serving as Executive Director of the San Francisco Taxi Commission before overseeing its merger with the San Francisco Municipal Transportation Agency. From 2009-2013, she worked as a Senior Associate at Cotchett, Pitre & McCarthy, LLP, where she led the team that secured the largest Ponzi scheme settlement in California history (and the largest settlement in United States history against an indenture trustee) in *In re Medical Capital Sec. Litig.*, Case No. SA-ML-02145-DOC (RNBx) (C.D. Cal.). Ms. Thigpen and her team were nominated in 2014 for Consumer Attorney of the Year by the Consumer Attorneys Association of California for their work on this matter. She also secured major class settlements involving major banks in several securities actions following the financial crisis of 2008. Ms. Thigpen is admitted to practice in California, New York, and the District of Columbia and several federal courts around the country. She has been acknowledged with several awards for her work on behalf of small businesspeople and fraud victims, including Small Business Advocate of the Year in 2008 from the San Francisco Small Business Network, and recognition from San Francisco District Attorney George Gascon and former Police Chiefs Greg Suhr and Heather Fong. She has also been named a Southern California Super Lawyer for 2016 and 2017.

In just thirteen years of practice, Ms. Thigpen has obtained more than \$242 million in settlements and verdicts on behalf of her clients.

Nicholas A. Kurtz was a senior associate with Johnson & Johnson LLP. Mr. Kurtz earned a B.A. in Communications, Legal Institutions, Economics, and Government from American University in Washington, DC where he was a Presidential Scholarship recipient, a member of the School of Public Affairs Leadership Program, and a Colonial Athletic Association Scholar Athlete with the nationally ranked Division I varsity soccer team. In 2004, Mr. Kurtz earned his J.D. from Loyola Law School, where he served as the Chief Research Editor on the Loyola of Los Angeles Entertainment Law Review and garnered a First Honors Award in his Title IX Seminar course.

Some of his significant experience includes:

- Selected for inclusion as a “Rising Star” in 2009 Southern California Super Lawyers and 2012 Virginia Super Lawyers
- Directed multiple copyright infringement cases on behalf of rights holders, including for Academy award winning film *The Hurt Locker*, against infringers who utilize torrent platforms
- Litigated copyright infringement cases over the film *Drumline* and *Cars* film franchise
- Successfully represented musical artist in breach of contract litigation resulting in \$350,000 judgment against former manager
- Awarded Rule 11 sanctions in securing dismissal of corporate defendant related to promotional campaign of former Beach Boys artist Brian Wilson in British newspaper

Presentations:

- American Bar Association – Copyright Litigation: Finding Anonymous Copyright Infringers (March 2012)
- Beverly Hills Bar Association – Film and TV Producers: How to Squeeze the Lemon; Additional income to be collected by producers and copyright owners (June 2009)
- Los Angeles Copyright Society – The Music Download Class Action Suits (December 2006)

Publications:

- Electronic Evidence in Torrent Copyright Cases, Digital Evidence and Electronic Signature Review, Pario Communications, Bedfordshire, UK (2011) (pp.171-178) (co-author with Thomas M. Dunlap)

Published decisions:

- *Call of the Wild Movie, LLC v. Does 1-1,062* (D. D.C. 2011) 770 F.Supp.2d 332
- *Donkeyball Movie, LLC v. Does* (D. D.C. 2011) 810 F.Supp.2d 20
- *Maverick Entertainment Group, Inc. v. Does 1-2,115* (D. D.C. 2011) 810 F.Supp.2d 1
- *Voltage Pictures, LLC v. Does 1-5,000* (D. D.C. 2011) 818 F.Supp.2d 28
- *Call of the Wild Movie, LLC v. Smith* (D. D.C. 2011) 274 FRD 334
- *Maverick Entertainment Group, Inc. v. Does 1-2,115* (D. D.C. 2011) 276 FRD 389
- *Voltage Pictures, LLC v. Vazquez* (D. D.C. 2011) 277 FRD 28
- *Achte/Neunte Boll Kino Beteiligungs GmbH & Co. v. Does 1-4,577* (D. D.C. 2010) 736 F.Supp.2d 212
- *West Bay One, Inc. v. Does 1-1,653* (D. D.C. 2010) 270 FRD 13

John D. Fowler was an associate at Johnson & Johnson LLP. He earned a B.A. in English from Vanderbilt University. In 2010 he graduated from Loyola Law School. While there he served as the General Managing Editor of The Los Angeles Public Interest

Law Journal, and as a member of the Scott Moot Court Honors Board. Mr. Fowler won “Best Overall Advocate” for highest combined oral advocacy and appellate brief score in the Scott Moot Court competition, competed in the National Moot Court Competition, and served as an Appellate Advocacy teaching assistant as a member of the board.

Mr. Fowler gained extensive litigation experience as a certified law clerk in the Los Angeles District Attorney’s office, working on over 25 cases, and personally arguing 8 juvenile bench trials. His pro-bono advocacy experience includes work with the General Relief Advocacy Project, and the Alliance for Children’s Rights.

While at the firm Mr. Fowler worked on a variety of Entertainment cases, including several rights of publicity cases.

Lan P. Vu was an associate at Johnson & Johnson LLP. She earned a B.A. in English from the University of California, Irvine. In 2004, Ms. Vu earned her J.D. from Loyola Law School, where she was consistently honored on the Dean’s List and was a recipient of the Ahmanson Foundation Scholarship and the First Honors Award. While at Loyola Law School, Ms. Vu was also a member of the finalist International Commercial Arbitration Vis Moot Court team that competed in Vienna in 2004. To date, Ms. Vu holds the 3rd highest individual argument round score in school history.

Some of her experience and significant litigations include:

- Co-authored chapter of media law practice guide concerning state and federal eavesdropping laws and media-related torts.
- Handled numerous complex litigations, including intellectual property actions and multi-million dollar insurance-related matters in state and federal court.
- Contributed to and authored appellate papers in several complex matters to the California Court of Appeals.

Heather L. Laird was an associate with Johnson & Johnson LLP. Ms. Laird earned a B.A. in Art History from the University of California, Los Angeles in 2008 and was a staff writer for The Daily Bruin. In 2013 she earned her J.D. from Loyola Law School, where she was a recipient of a Merit Scholarship. While at Loyola Law School, Ms. Laird served as an Editor of the Entertainment Law Review. Ms. Laird was also a torts tutor for first year law students.

OVERVIEW OF PAST AND PENDING LAWSUITS

In the last 10 years the firm has brought litigation or settled it before filing in at least 24 matters for violation of the right of publicity. To our knowledge, we are one of two firms in Southern California that have the largest right of publicity cases representing plaintiffs.

In 2014, the firm had a trial victory in successful defense of copyright infringement and theft of idea claim, *Goodness Films LLC v. Weinberger* (USDC - Central).

In the past year, the firm had a confidential settlement of major net profit claim for a major television producer against a major studio in the mid-seven figures. The firm also negotiated a confidential settlement of a libel claim against a major publication in the mid-seven figures. Each of these cases took more than four years of hard-fought litigation against large law firms.

The firm was lead counsel in two major settlements of class actions against Universal Studios and Paramount Studios over underpayment of home video monies. Class action proceedings are proceeding in similar claims against four other studios.

We represented the owner of the rights to a major movie franchise in litigation over the rights thereto, which settled successfully, with the firm negotiating a major rights agreement. We brought litigation when Disney refused to let an audit proceed. *Richard Dreyfuss v. Walt Disney Studios* (LASC). The case is pending, along with an audit permitted after the lawsuit was filed. We represent one of the largest producers of television in the world relating to a valuable game show.

We are general counsel to WorldstarHipHop, the largest urban website in the world, handling all litigation and transactional matters, and deal with right of publicity issues for that entity on a near daily basis.

We are counsel for the plaintiff involving large claims of money not paid to a producer of music for Fox Sports. *Davis v. Fox Entertainment Group, Inc.* (LASC). We are counsel in a matter involving a rock group split up. *Moore v. Stepanek* (LASC). We are counsel in an interference with contract claim against a large talent agency. *Gadfly Communications, Inc. v. Paradigm Talent Agency, LLC* (LASC). We represented the largest multichannel network in Europe and successfully settled litigation. *Jukin Media v. Zoomin.TV* (USDC - Central). We represented a party in major litigation over television themes, including Andy Griffith Show and Mr. Ed., and the case settled after extensive litigation. *Broadcast Music, Inc. v. Hagen* (LASC).

We have prosecuted and settled many right of publicity claims. We are currently

prosecuting for the wrongful use of an image by a drug company. *Haywood v. Merz* (LASC).

We recently settled a class action for the wrongful taping of phone calls. *Mount v. Wells Fargo* (LASC). The firm represented plaintiffs in over ten cases involving Anthony Pellicano, who corrupted the legal system by illegal wiretapping and other sordid practices. After ten years of litigation, we have finally resolved the last of these cases.

We recently negotiated a talent agreement with Nickelodeon for a young talent to star in productions on that channel, and the exit of that talent from another company under threat of litigation. We represent many legacy talents, such as Mitch Ryder and the Estates of Rick Nelson and Buddy Holly. We are litigation counsel working with other transactional law firms. We do daily counseling on entertainment and media matters.

We have been counsel in many class actions, many of which are entertainment related. These include the following class actions, which are delineated to show we often take on giant entities who fight back, and we are nonetheless successful in resolving them.

Class Actions:

Bedran v. American Express Travel Related Services, Inc., Los Angeles Superior Court Case No. BC241979. We brought a class action against American Express that exposed a systematic error that caused card members to unnecessarily forfeit up to 1 Billion of the Membership Rewards Program (MRP) points. The matter settled for the return to card members nationwide of a minimum of 450 million and up to 1 Billion MRP points, as well as the correction of the systematic error causing the problem. We were sole counsel.

Fears v. Wilhelmina, Case No. 02-CV-4911 (S.D.N.Y.). We pioneered a class action lawsuit against the major New York model agencies (including Ford Models, Elite, Wilhelmina) on behalf of thousands of New York models for conspiring to fix model commissions and other terms in violation of the Sherman Antitrust Act. The matter resulted in an approximate \$25 million recovery for the models, including substantial reforms in the manner in which model agencies can operate. Published Decisions: *Fears v. Wilhelmina Model Agency, Inc.*, 2005 WL 1325297 (S.D.N.Y. Jun 06, 2005); *Fears v. Wilhelmina Model Agency, Inc.*, 2004 WL 594396, 2004-1 Trade Cases P 74,351 (S.D.N.Y. 2004); *Fears v. Wilhelmina Modeling Agency, Inc.*, 61 Fed. R. Evid. Serv. 1451 (S.D.N.Y. 2003). We were co-lead counsel in the case with legendary attorney David Boies and Boies Schiller & Flexner LLP.

Gustafson v. Chase Manhattan Bank USA, N.A., Los Angeles Superior Court Case No. BC319892. We brought a class action that challenged Chase's improper imposition of over the limit fees in connection with cardholders' transfer of previous loan balances to

certain of Chase's credit card products. The case settled and was approved by the Court, resulting in a fund of approximately \$300,000 for a nationwide class. We were sole counsel.

Ory. v. Columbia House Music Club, U.S. District Court for the Central District of California, Case No. CV02-2342SJO. We brought a class action lawsuit for copyright infringement against record clubs, Columbia House and BMG Direct, as a result of their 30 year practice of paying composers of musical compositions only 75% of the publishing royalties they are statutorily entitled. The matter was successful (despite that a nearly identical action was dismissed by the courts 10 years earlier), resulting in a \$6.5 million settlement for composers as well as industry reforms preventing this conduct in the future. We were co-lead counsel in the case.

Webster v. Allstate Insurance Company, Progressive Casualty Insurance Company, Los Angeles Superior Court Case No. BC338075. Class action alleging violation of unfair business practices law with antitrust issues relating to payment to body shops by insurance companies. We were lead counsel in the case.

Richert v. Writers Guild of America West, Inc., Los Angeles Superior Court Case No. BC339972. Class action certified in 2010. The case settled for one hundred million dollars in unpaid foreign royalties to all members of the guild. We were lead counsel.

Webb v. Directors Guild of America, Inc., Los Angeles Superior Court Case No. BC352621. Class action certified and settled which will cause over \$5 million dollars of unpaid royalties to be paid out to all the members of the guild. We were sole counsel.

Osmond v. Screen Actors Guild, Inc., Los Angeles Superior Court Case No. BC377780. Class action certified and settled for tens of millions of dollars in unpaid royalties to be paid to the members of the guild. We were lead counsel in the case.

Miller v. City of Los Angeles, et al., Los Angeles Superior Court Case No. BC356529. Pending class action alleging invasion of privacy based on illegal running of citizens' private records. The case was certified in 2013. The case is linked to the infamous, disgraced, private detective Anthony Pellicano. Mr. Pellicano bribed a Los Angeles police officer for over 15 years to illegally run private databases. We are sole counsel.

Russo v. City of Beverly Hills, et al., Los Angeles Superior Court Case No. BC356541. Recently settled class action alleging invasion of privacy based on illegal running of citizens' private records. The case is linked to the infamous, disgraced, private detective Anthony Pellicano. Mr. Pellicano bribed a Beverly Hills police officer for over 7 years to illegally run private databases. The case settled and the court granted final approval. We

were sole counsel.

Greenberg v. E-Trade Financial Corporation, Los Angeles Superior Court Case No. BC360152. Class action alleging invasion of privacy based on company's illegal recording of customers' calls. The case was certified and settled for seven million dollars. We were lead co-counsel.

Galavis v. LA Models, Los Angeles Superior Court Case No. BC382372. Class action alleging breach of contract and unfair business practices for improperly calculating fees owed to the models and charging impermissible costs. We were sole counsel.

Bouchard v. Optometrix, Los Angeles Superior Court Case No. BC416146. Class action alleging invasion of privacy based on hidden cameras in the exam rooms. The case was certified in 2011. This case was settled, and the court granted final approval. We were sole counsel.

Armuth v. Linton, U.S. District Court for the Central District of California, Case No. CV 11-0220-AHM-(Ex). Consumer class action in based on false advertising of beauty products. This case was recently settled in 2012, and the court granted final approval. We were sole counsel.

Gerash v. Verizon Communications, Los Angeles Superior Court Case No. BC459508. Class action alleging violations for unfair business practices in violation of various California statutes, including without limitation *Cal. Cvi. Code* §§1722, 1750 et seq., and *Cal. Bus. & Prof.* §17200 et seq. We were sole counsel.

In Re: Warner Music Group Corp. Digital Download Litigation., Case No. CV 12-0559; *Otis Williams v. UMG Records*, Case No. CV 12-1289; *Martha Davis v. EMI Group Limited*, Case No. CV 12-01602 (all in U.S. District Court for the Northern District of California). Class actions on behalf of recording artists and producers who allege that they have been systematically underpaid royalties by the record companies. The *Warner* case recently settled for thirteen million and received final approval. The *UMG* case settled for nearly twelve million. We are co-lead counsel.

Susan Dukow v. Sony Pictures Entertainment, Case No. BC566884. Class action for Sony's failure to prevent the data breach that exposed more than 47,000 of the company's current and former employees' personal data, including Social Security numbers, salaries, and medical information. A group of hackers called Guardians of Peace took over Sony's network after its release of North Korean-themed comedy, *The Interview*. The claims against Sony are for violation of privacy rights, negligence, *Cal. Civ. Code* § 1798.80, and *Cal. Civ. Code* §56. Our firm is on the executive committee.

Friedman v. Guthy-Renker LLC and WEN by Chaz Dean, Inc., U.S. District Court for the Central District of California, Case No. 14-cv-06009. Class action for false advertising and personal injury claims relating to shampoo sold by the defendants. The case recently settled for \$26 million. We were co-counsel.

Colin Higgins Productions, Ltd. v. Universal City Studios, LLC, Los Angeles Superior Court Case No. BC499180. Class action for breach of contract and conversion alleging that defendant short changed profit participants by accounting for only a fraction of home video earnings. The case recently settled for \$25 million. We were co-lead counsel and the court granted final approval of the settlement.

Colin Higgins Productions, Ltd. v. Paramount Pictures Corporation, Case No. BC499179 is another class action related to profit participants and home video revenue accounting, which has also recently settled.

Stanley Donen Films, Inc. v. Twentieth Century Fox Film Corporation, Case No. BC499181; *Larry E. Martindale v. Sony Pictures Entertainment, Inc.*, Case No. BC499182; *Stuntman, Inc. v. Warner Bros. Entertainment, Inc.*, Case No. BC500040; *Joan J. Buck v. Metro-Goldwyn-Mayer Studios, Inc.*, Case No. BC540146 (all in Los Angeles Superior Court). Class actions for breach of contract and conversion alleging that movie studios have short changed profit participants by accounting for only a fraction of home video earnings. We are co-lead counsel.

EXHIBIT B

**DONEN V. FOX
TIME REPORT**

FIRM NAME: JOHNSON & JOHNSON LLP
REPORTING PERIOD: INCEPTION - DECEMBER 5, 2017

Categories:

- | | |
|---------------------------------|-------------------------|
| (1) Attorney Meeting / Strategy | (8) Pleadings & Motions |
| (2) Case Management | (9) Settlement |
| (3) Client Meeting | |
| (4) Court Appearances | |
| (5) Discovery | |
| (6) Experts | |
| (7) Research | |

Status:

- (P) Partner
(A) Associate
(LC) Law Clerk
(OC) Outside Counsel

NAME	STATUS										TOTAL	HOURLY	AMOUNT
		1	2	3	4	5	6	7	8	9	HOURS	RATES	
NEVILLE JOHNSON (Blended Rate)	P	14.14	19.3	1.76	9	6.34	0.93	10.8	6.41	26.48	95.16	\$ 953.54	\$ 90,738.87
DOUGLAS JOHNSON (Blended Rate)	P	12.8	12.79		13.9	4.5	0.2	8.52	10.8	23.27	86.78	\$ 726.75	\$ 63,067.37
JAMES RYAN (Blended Rate)	OC	2	0.7			0.3		0.3		8.40	11.70	\$ 698.34	\$ 8,170.58
JORDANNA THIGPEN	A								13.00		13.00	\$ 600.00	\$ 7,800.00
NICHOLAS A. KURTZ	A	2.43	4.7			15.28		7.49	13.1		43.00	\$ 600.00	\$ 25,800.00
JOHN D. FOWLER	A	0.3	2.82	0.44				9.16			12.72	\$ 450.00	\$ 5,724.00
ALYSON C. DECKER	A	0.14	0.5					2.06	0.38		3.08	\$ 600.00	\$ 1,848.00
JENNIFER Y. RO	A	0.7				0.3					1.00	\$ 600.00	\$ 600.00
BRIAN T. MURRAY	A	0.28	0.42								0.70	\$ 450.00	\$ 315.00
JENNIFER MCGRATH	A									1.10	1.10	\$ 750.00	\$ 825.00
LAN P. VU	A								0.2		0.20	\$ 665.00	\$ 133.00
AVIEL DAHAN	A								1		1.00	\$ 450.00	\$ 450.00
J&J ATTORNEY TOTALS													\$ 205,471.82
TOTALS		32.79	41.23	2.20	22.90	26.72	1.13	38.33	44.89	59.25	269.44		205,471.82

EXHIBIT C

EXHIBIT C - COSTS

	Donen v. Fox Costs - Johnson & Johnson LLP					
Photocopies	Indiv.					\$244.98
Messenger/Court Service	Indiv.					\$179.50
Filing fee	Indiv.					\$1,435.00
Accounting	Indiv.					\$2,550.08
Parking	Indiv.					\$90.80
Case Anywhere	Joint					\$1,840.17
Inventus	Joint					\$15,136.29
Mediation Fees/ADR	Joint					\$8,894.00
Veritext	Joint					\$7,082.64
Expert Consult Fees	Joint					\$6,450.00
Total Costs						\$43,903.46
Total Indiv. Costs						\$4,500.36
Total Joint Costs						\$39,403.10

EXHIBIT D

EXHIBIT D - Litigation Fund Firm Contributions

	Firm Contributions for Fox
BOUCHER	2,616.50
PSW	15,221.41
J&J	9,718.78
KIESEL	11,846.80
Total	\$39,403.10