

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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IN RE: AUTOMOTIVE PARTS ANTITRUST : No. 12-md-02311  
LITIGATION : Hon. Marianne O. Battani  
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In Re: Wire Harness : Case No. 2:12-cv-00103  
In Re: Instrument Panel Clusters : Case No. 2:12-cv-00203  
In Re: Heater Control Panels : Case No. 2:12-cv-00403  
In Re: Bearings : Case No. 2:12-cv-00503  
In Re: Anti-Vibrational Rubber Parts : Case No. 2:13-cv-00803  
In Re: Windshield Wipers : Case No. 2:13-cv-00903  
In Re: Radiators : Case No. 2:13-cv-01003  
In Re: Starters : Case No. 2:13-cv-01103  
In Re: Automotive Lamps : Case No. 2:13-cv-01203  
In Re: Ignition Coils : Case No. 2:13-cv-01403  
In Re: HID Ballasts : Case No. 2:13-cv-01703  
In Re: Electronic Powered Steering Assemblies : Case No. 2:13-cv-01903  
In Re: Fan Motors : Case No. 2:13-cv-02103  
In Re: Fuel Injection Systems : Case No. 2:13-cv-02203  
In Re: Power Window Motors : Case No. 2:13-cv-02303  
In Re: Automatic Transmission Fluid Warmers : Case No. 2:13-cv-02403  
In Re: Air Conditioning Systems : Case No. 2:13-cv-02703  
In Re: Windshield Washer Systems : Case No. 2:13-cv-02803  
In Re: Constant Velocity Joint Boot Products : Case No. 2:14-cv-02903  
In Re: Spark Plugs : Case No. 2:15-cv-03003  
In Re: Shock Absorbers : Case No. 2:15-cv-03303  
In Re: Body Sealing Products : Case No. 2:16-cv-03403  
In Re: Interior Trim Products : Case No. 2:16-cv-03503  
In Re: Automotive Brake Hoses : Case No. 2:16-cv-03603  
In Re: Exhaust Systems : Case No. 2:16-cv-03703  
In Re: Ceramic Substrates : Case No. 2:16-cv-03803  
In Re: Automotive Steel Tubes : Case No. 2:16-cv-04003  
In Re: Access Mechanisms : Case No. 2:16-cv-04103  
In Re: Door Latches : Case No. 2:17-cv-11637

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THIS DOCUMENT RELATES TO: :  
End-Payor Actions :

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**NOTICE OF ERRATA TO END-PAYOR PLAINTIFFS' MOTION FOR AN AWARD  
OF ATTORNEYS' FEES AND REIMBURSEMENT OF CERTAIN EXPENSES  
IN CONNECTION WITH THE ROUND 3 SETTLEMENTS**

Settlement Class Counsel for End-Payor Plaintiffs (“EPPs”)<sup>1</sup> write to correct two arithmetical errors in their Motion for an Award of Attorneys’ Fees and Reimbursement of Certain Expenses in Connection with the Round Three Settlements (the “Motion”), *e.g.*, *Wire Harness*, 2:12-cv-0103, ECF No. 603 (June 14, 2018).

First, in our memorandum in support of the Motion, we indicated that we were excluding all time and lodestar associated with a particular document review attorney that was submitted in connection with the Round 1 and Round 2 Settlements, totaling 6,251.00 hours and \$2,043,450.00 in lodestar. Memo at 25-26 n.18; *see also* Joint Decl. in Support of EPPs’ Mot. for an Award of Attorneys’ Fees (“Joint Decl.”), *e.g.*, *Wire Harness*, 2:12-cv-0103, ECF No. 603-1 (June 14, 2018), at 14 n.3. The correct figures for this attorney’s time and lodestar submitted in connection with the Round 1 and Round 2 Settlements, all of which we are excluding, are 5,572.6 hours and \$1,807,000 in lodestar.

Second, our memorandum stated that Class Counsel and staff have worked 347,241.5 hours and have a cumulative reported lodestar (*i.e.*, from March 23, 2012 through March 31, 2018) of \$142,090,627.68. Memo at 25; *see also* Joint Decl. ¶ 25. These figures did not reflect the deductions noted above. The correct number of hours is 341,668.9 and the correct cumulative lodestar for Class Counsel is \$140,283,627.68. Based on the cumulative lodestar figure noted in our memorandum, we stated that our requested fee would result in a multiplier of 1.61. Memo at

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<sup>1</sup> In granting preliminary approval of these settlements, the Court appointed Robins Kaplan LLP, Cotchett, Pitre & McCarthy, LLP and Susman Godfrey L.L.P. Settlement Class Counsel. *See, e.g.*, Order Granting Preliminary Approval of Proposed Settlement with the Mitsuba Defendants and Provisional Certification of the Settlement Classes at 6, ¶ 7, *Windshield Washer Systems*, 2:13-cv-02803, ECF No. 112.

26; *see also* Decl. ¶ 25. After adjusting for the corrected cumulative lodestar figure, the requested fee would result in a multiplier of 1.63.

Date: July 19, 2018

Respectfully submitted,

/s/ Hollis Salzman

Hollis Salzman

Bernard Persky

William V. Reiss

**ROBINS KAPLAN LLP**

399 Park Avenue, Suite 3600

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

HSalzman@RobinsKaplan.com

BPersky@RobinsKaplan.com

WReiss@RobinsKaplan.com

Adam J. Zapala

Elizabeth T. Castillo

**COTCHETT, PITRE & McCARTHY, LLP**

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

azapala@cpmlegal.com

ecastillo@cpmlegal.com

Marc M. Seltzer

Steven G. Sklaver

**SUSMAN GODFREY L.L.P.**

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067-6029

Telephone: (310) 789-3100

Facsimile: (310) 789-3150

mseltzer@susmangodfrey.com

ssklaver@susmangodfrey.com

Terrell W. Oxford  
Chanler A. Langham  
**SUSMAN GODFREY L.L.P.**  
1000 Louisiana St., Suite 5100  
Houston, TX 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
toxford@susmangodfrey.com  
clangham@susmangodfrey.com

*Interim Co-Lead Class Counsel for the  
Proposed End-Payor Plaintiffs Classes*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2018 I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Hollis Salzman  
Hollis Salzman