

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----	x	MDL No. 1409
	:	M 21-95
IN RE	:	
	:	
CURRENCY CONVERSION FEE	:	
ANTITRUST LITIGATION	:	
	:	
	x	Index No. 05 CV 7116 (WHP)
THIS DOCUMENT RELATES TO:	:	
	:	
ROBERT ROSS, et al.,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	Jury Trial Demanded
	:	
BANK OF AMERICA, N.A, et al.,	:	
	:	
Defendants.	:	
	:	
-----	x	

**DECLARATION OF ALLAN STEYER IN SUPPORT OF STEYER LOWENTHAL
BOODROOKAS ALVAREZ & SMITH LLP'S APPLICATION FOR
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Allan Steyer, declare as follows:

1. I am a partner of the law firm of Steyer Lowenthal Boodrookas Alvarez & Smith LLP (the "Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm"). My firm has acted as counsel to Class Plaintiffs in this action.

2. I am submitting this Declaration in support of Class Plaintiffs' application for an award of attorneys' fees for services rendered in the above-captioned litigation and for reimbursement of costs and expenses incurred in connection with this litigation.

3. The Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm's compensation for the services rendered on behalf of Plaintiffs and the Settlement Class is wholly contingent, and the firm has been completely at risk that it would not receive any compensation for prosecuting these claims against the defendants.

4. All attorneys, paralegals and clerks at my firm are instructed to keep contemporaneous time records reflecting the time spent on this and other matters.

5. Attached as Exhibit 1 hereto is a précis of the Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm's qualifications and accomplishments.

6. During the period from the inception of the case through May 1, 2010, the Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm performed 14 hours of work in connection with this litigation. Specifically, Scott Macrae conducted legal research and worked on pleadings including a draft complaint regarding arbitration conspiracy and a § 1292 (b) petition.

7. The total lodestar amount for attorney/professional support staff time based on the firm's rates, at the time of accrual, is \$6,681.25. Attached hereto as Exhibit 2 is a schedule containing a detailed summary indicating amount of time – by category – spent by the partners, associates and other professional support staff of my firm who were involved in this litigation, the number of hours worked, their rates and their respective lodestar values. The rates at which the firm seeks compensation are its usual and customary hourly rates charged for its attorney' and professionals' services in similar complex class action litigation and do not include charges for expense items, which are billed separately. The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. None of the time included in this fee application represents any work done in connection with preparing this

Declaration or otherwise related to petitioning for award of attorneys' fees or seeking reimbursement of costs.

8. All of the services performed by the Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm in connection with this litigation were reasonably necessary in the prosecution of this case. There has been no unnecessary duplication of services for which the firm now seeks compensation.

9. During the period from inception of this litigation through May 1, 2010, the Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm incurred unreimbursed expenses in connection with the prosecution of this litigation in the sum of \$9.15. These expenses were reasonably and necessarily incurred in connection with this litigation and are detailed in the chart attached as Exhibit 3.

10. The expenses incurred are reflected on the books and records of the Steyer Lowenthal Boodrookas Alvarez & Smith LLP Firm. These books and records are prepared from checks, expense vouchers and other source materials which are regularly kept and maintained by the firm and accurately represent the expenses incurred.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of May, 2010.

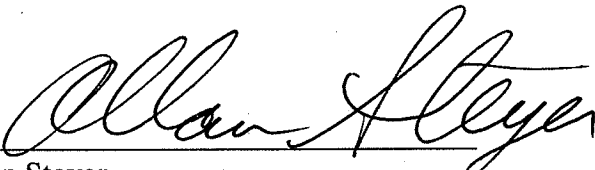

Allan Steyer

Exhibit 1

**STEYER LOWENTHAL BOODROOKAS
ALVAREZ & SMITH LLP**

One California Street, Third Floor
San Francisco, CA 94111
Telephone: (415) 421-3400
Fax: (415) 421-2234
Email: steyerlaw.com

PARTNERS

Jeffrey H. Lowenthal, (Member) born Los Angeles, California, January 10, 1958; admitted to bar, 1983, California. **Education:** University of California at Los Angeles (B.A., 1980); Boalt Hall School of Law, University of California at Berkeley (J.D., 1983). **Activities:** Chairman, Boalt Hall Moot Court Board, 1982-1983. Northern California Super Lawyer, 2005-2009 and 2007, Real Estate Litigation. Instructor, Boalt Hall School of Law, University of California, 1985-1986. Author, "Evidence," California Litigation Review, April 1997. Board of Directors, Huckleberry Youth Programs, Inc., 2005—. Member, Kentfield Schools Foundation, 1999-2001. Panelist, Early Settlement Program, Bar Association of San Francisco, 2002—. **Member:** Bar Association of San Francisco; State Bar of California; Marin Trial Lawyers Association (Member, Board of Trustees, 2002); Association of Business Trial Lawyers; California Land Title Association. **Practice Areas:** Real Property; Title Insurance Law; Commercial Litigation. **E-mail:** jlowenthal@steyerlaw.com

Allan Steyer, (Member) born Brooklyn, New York, July 25, 1952; admitted to bar, 1981, California. **Education:** State University of New York at Buffalo (B.A., magna cum laude, 1973); University of San Francisco (J.D., 1981). **Activities:** Legal Externship, California Supreme Court, Justice Mathew O. Tobriner, 1980. Selected by peers, Northern California Super Lawyer, 2004-2010. Author: "Era of Accounting Irregularities," May, 2002; "Comprehensive General Liability Policies, 1993: Obligation of the Parties," Practicing Law Institute; "Insurance Claims and Coverage Litigation;" "The Unfair Settlement Practices Regulations: Issues Relating to Discovery, Admissibility of Evidence In Civil Actions, and Exhaustion of Administrative Remedies," June, 1993; "Cross-Examination: Seven Steps To Success," California Litigation, Spring Issue, 1991. Speaker: Hot Topics in Financial Institution Litigation, State Bar of California Convention, September 2005 and October 2004; Innovative Strategies for Pursuing Unfair Competition Claims, State Bar of California Antitrust and Unfair Competition Law Section, May 2004; 2003 Advanced Business Litigation Institute, California CPA Education Foundation - Admissibility of Expert Witness Testimony; Advanced Business Litigation Institute Conference, California CPA Education Foundation, Era of Accounting Irregularities, May 2002; Punitive Damages in California Courts: Post BMW v. Gore, CAOC Seminar, December, 1998; Punitive Damages: Post BMW v. Gore - An Update, CAOC Seminar, December 1997; Punitive Damages: BMW Case, CAOC Seminar, December, 1996; Mediating Wrongful Termination, Harassment and Discrimination Cases, CAOC Seminar, November 1995; The After-Acquired Evidence Defense - Alive and Well?, CAOC Seminar, November 1995; Punitive Damages: Current Status and Trends, CTLA Seminar, December 1993; California Unfair Claims Settlement Practices Regulations: Compliance, Enforcement and Beyond, San Francisco Bar Association Program, June 1993; PLI Program, Comprehensive General Liability

Policies; Insurance Claims and Coverage Litigation, New York, May 1993; "The 'Lincoln Savings' Trial," CTLA Seminar, December 1992; "Handling Claims Against Savings and Loan Officers and Directors," ATLA Advance Seminars, August 1991; "Securities Fraud: The Big Cases and the Small Cases," Kansas Trial Lawyers Association Annual Meeting, 1988. Panelist, Early Settlement Program, Bar Association of San Francisco. Instructor, National Institute for Trial Advocacy, Berkeley, California, 1999, San Francisco, California, 2001. Judge Pro Tem, San Mateo Superior Court, 1994-1998. **Member:** San Francisco, San Mateo County (Member: Bench and Bar Committee, 1990, 1994, 1996-2004; ADR Committee, 1994-1996) and American Bar Associations; State Bar of California; Consumer Attorneys of California; San Mateo County Trial Lawyers Association (Member, Board of Directors, 1987-1996; President, 1995); San Francisco Trial Lawyers Association (Member, Board of Directors, 1996-2008); The Association of Trial Lawyers of America; Association of Business Trial Lawyers. **Practice Areas:** Antitrust; Commercial Litigation; Consumer Class Actions; Investment Fraud; Labor and Employment; Securities; Real Property. **E-mail:** asteyer@steyerlaw.com

Nick A. Boodrookas, (Member) born Modesto, California, June 3, 1958; admitted to bar, 1983, California. **Education:** University of California, Davis (A.B., with highest honors, 1980); Boalt Hall School of Law, University of California, Berkeley (J.D., 1983). **Activities:** Phi Beta Kappa. Lecturer, Continuing Education of the Bar of California. Northern California Super Lawyer, 2005 and 2006, Labor & Employment Law. Member, 1998-2004, and President, 1999-2001, Board of Trustees, Saint Mark's School. Member, 2002—, and Chairman, 2004—, Board of Trustees, Marin Academy. **Member:** Bar Association of San Francisco; State Bar of California (Member, Labor and Employment Law Section). **Reported Cases:** *Laborers Health & Welfare v. Westlake Development*, 53 F.3d 979 (9th Cir. 1995). **Practice Areas:** Labor and Employment; Litigation; Nonprofit Organizations; Independent Schools. **E-mail:** nboodrookas@steyerlaw.com

Carlos A. Alvarez, (Member) born Los Angeles, California, April 1, 1964; admitted to bar, 1989, California. **Education:** University of San Francisco (B.A., 1986); Boalt Hall School of Law, University of California at Berkeley (J.D., 1989). **Member:** The Bar Association of San Francisco; State Bar of California (Member, Sections on: Litigation and Real Property); San Francisco La Raza Lawyers Association; California Land Title Association. **Practice Areas:** Commercial Litigation; Real Property; Consumer Class Actions. **E-mail:** calvarez@steyerlaw.com

Edward Egan Smith, (Member) born Williamsburg, Virginia, February 4, 1965; admitted to bar, 1994, California. **Education:** University of Virginia (B.A., 1987); University of California, Hastings College of the Law (J.D., 1991). **Activities:** Senior Research Editor, Editorial Board, Hastings Law Journal, 1990-1991. Law Clerk to The Honorable Ed Carnes, U.S. Circuit Judge, Eleventh Circuit Court of Appeals, 1992-1993, and The Honorable Robert E. Varner, Senior U.S. District Judge, U.S. District Court, Middle District of Alabama, 1991-1992. Author, "The Criminalization of Belief: When Free Exercise Isn't," 42 Hastings L.J. 1491 (1991). **Member:** State Bar of California; Bar Association of San Francisco. **Practice Areas:** Commercial Litigation; Appeals; Labor and Employment; Real Property. **E-mail:** esmith@steyerlaw.com

SENIOR COUNSEL

Donald Scott Macrae, born Summit, New Jersey, 1956; admitted to bar, 1982, California. **Education:** Bowdoin College at Brunswick, Maine (B.A., 1978); Boalt Hall School of Law, University of California at Berkeley (J.D., 1982). **Activities:** Recipient: James Bowdoin Scholar; American Jurisprudence Award. **Practice Areas:** Consumer Class Actions; Antitrust; Commercial, Securities. **Email:** smacrae@bamlawlj.com

Jayne A. Peeters, born Neenah, Wisconsin, April 21, 1954; admitted to bar, 1983, California. **Education:** University of Wisconsin, Madison, Wisconsin (B.S. 1976); Hastings College of the Law, University of California (J.D. 1982). **Activities:** Legal Externship, Marin Superior Court, 1982; Settlement Panelist, Marin Superior Court, 2002-2003. **Member:** Bar Association of San Francisco; State Bar of California. **Practice areas:** Class Actions; Commercial Litigation; Real Property. **Email:** jpeeters@steyerlaw.com

ASSOCIATES

Bryan Matthew Kreft, born Los Altos, California, March 5, 1974; admitted to bar, 2000, California. **Education:** University of California, Los Angeles (B.A., 1996); Santa Clara University (M.B.A., 2000, J.D., 2000). **Member:** Bar Association of San Francisco; State Bar of California. **Practice Areas:** Class Actions; Commercial Law; Litigation; Real Property; Insurance. **Email:** bkreft@steyerlaw.com

Lisa Marie Black, born Springfield, Massachusetts, September 6, 1972; admitted to bar, 2003, California; 2002, Massachusetts. **Education:** University of Connecticut (B.A., magna cum laude, Economics Honors Scholar, 1994; M.A., 1996); Hastings College of the Law, University of California (J.D., 2002). **Activities:** Recipient: Blum Foundation Scholarship (1999-2002); Outstanding Student Leader Award, U.C. Hastings (2002). **Member,** Board of Directors, 2000-2002, 2003—, General Assistance Advocacy Project. **Member:** State Bar of California; American Bar Association; Bar Association of San Francisco. **Practice Areas:** Real Property Litigation; Commercial Litigation; Class Actions; Employment and Labor Law. **Email:** lwilliams@steyerlaw.com

Simon R. Goodfellow, born Bristol, England, November 19, 1973; admitted to bar, 2006, California. **Education:** University of Leeds, Leeds, England (B.A., 1997); University of California Hastings College of the Law (J.D., cum laude, 2006). **Activities:** Articles Editor, *Hastings International and Comparative Law Review*. **Member:** Bar Association of San Francisco; State Bar of California. **Practice Areas:** Class Actions; Commercial Litigation, Real Property. **Email:** sgoodfellow@steyerlaw.com

Benjamin R. Ehrhart, born Cedar Rapids, Iowa, June 8, 1978; admitted to bar, 2005, California, 2006, Minnesota. **Education:** University of Michigan, Ann Arbor (B.A., 2001); University of California Hastings College of the Law (J.D. 2005). **Activities:** Member of *Hastings International and Comparative Law Review*, Volunteer for General Assistance Advocacy Project. **Member:** State Bar of California, Minnesota State Bar Association. **Practice Areas:** Commercial Litigation, Real Property, Class Actions. **Email:** behrhart@steyerlaw.com

Lucas E. Gilmore, born San Diego, California, December 8, 1979; admitted to bar, 2007, California. **Education:** Vanderbilt University, Nashville, TN (B.A., cum laude, 2002); University of California Hastings College of the Law (J.D., 2007). **Activities:** Legal Externship, Chief Judge Vaughn R Walker, United States District Court, Northern District of California, 2006. **Member:** Bar Association of San Francisco; State Bar of California. **Practice Areas:** Commercial Litigation and Real Property. **Email:** lgilmore@steyerlaw.com

Margaret Aleks, born Milwaukee, Wisconsin, February 10, 1981; admitted to bar, 2006, California. **Education:** Middlebury College, Middlebury, Vermont (B.A., summa cum laude, 2003); University of California, Hastings College of the Law (J.D., 2006); University of California, Berkeley (M.A., 2008). **Activities:** Editor, Hastings Race & Poverty Law Journal; West Coast Regional Coordinator & Affiliate President, Law Students for Reproductive Justice; Executive Board, Clara Foltz Feminist Association; Extern, San Francisco District Attorney's Office. **Member:** State Bar of California, American Bar Association, Bar Association of San Francisco, American Constitution Society. **Practice Areas:** Antitrust Class Actions, Litigation, Non-Profit, Real Property. **E-mail:** maleks@steyerlaw.com

Michelle Akerman, born Los Angeles, California, April 17, 1979; admitted to bar, 2009, California. **Education:** University of California at Davis, Davis, California (B.S., 2004); University of California Hastings College of the Law (J.D., cum laude, 2009). **Activities:** Author, "*Brown v. United States, The Paquete Habana, and the Executive*" 60 Hastings L.J. 149 (2008); Senior Articles Editor, Hastings Law Journal; Intern, Marin County Public Defender's Office. **Member:** State Bar of California; Bar Association of San Francisco, San Francisco La Raza Lawyers Association. **Practice Areas:** Commercial Litigation; Real Property; Antitrust Class Actions; Employment and Labor Law. **Email:** makerman@steyerlaw.com

OF COUNSEL

Jill M. Manning, (Of Counsel) born Carmel, California, July 19, 1969; admitted to bar, 1995, California. **Education:** University of California at Davis (B.A., 1991); Cambridge University, Pembroke College (summer, 1990); University of San Francisco School of Law (J.D., 1995). **Member** (1993-1994) and **Editor** (1994-1995), USF Law Review. **Activities:** Board of Trustees, Shoreline Acres Preschool (2005—); **Member** (2004-2005) and **President** (2005—), Meridian's Rolling Hills Club Tennis Board; **Member**, Marin Agricultural Land Trust (1999—); **Member**, Marin Women's Commission (2004-2005). **Testified** before Senate Assembly and Judiciary Committees regarding AB 1090. **Reported Cases:** *Bartold v. Glendale Federal Bank* (2000) 81 Cal.App.4th 816, rev. den. (Oct. 18, 2000). **Member:** Bar Association of San Francisco; State Bar of California; American Bar Association; Marin Trial Lawyers Association; Consumer Attorneys of California. **Practice Areas:** Consumer Class Actions; Securities Fraud; Antitrust; Employment. **Email:** jill@sartorifarms.com

Henry A. Cirillo, (Of Counsel); admitted to bar, 1987, California. **Education:** Cornell University (B.S.); University of California, Hastings College of the Law (J.D.). **Practice Areas:** Securities Litigation; Business Litigation; Antitrust; Class Actions; Real Estate Litigation. **Email:** hcirillo@steyerlaw.com

**STEYER LOWENTHAL BOODROOKAS
ALVAREZ & SMITH LLP**

The firm is a litigation boutique based in San Francisco that has a civil litigation practice with an emphasis on complex litigation, including antitrust, consumer, and investment fraud and securities class actions and representative actions, real property, partnership, employment and labor, and commercial litigation. The firm's two senior partners have been chosen by their peers as Super Lawyers in Northern California.

CLASS ACTION AND OTHER COMPLEX LITIGATION MATTERS

A. Consumer

Schwartz v. Visa International Corp., et al. – representing plaintiffs in nationwide consumer representative action regarding imposition on credit card users of hidden, foreign currency conversion fees (including six month trial) (Alameda County Superior Court and pending appeal). (Settlement pending.)

Shrieve v. Visa U.S.A. Inc., et al. – co-lead counsel – representing plaintiffs in putative nationwide consumer class action regarding imposition on debit card users of hidden, foreign currency conversion fees (Alameda County Superior Court). (Settlement pending.)

Mattingly v. Visa U.S.A. Inc., et al. – co-lead counsel – representing plaintiffs in putative nationwide consumer class action regarding imposition on credit card users of hidden, foreign currency conversion fees (Alameda County Superior Court). (Settlement pending.)

Lipuma v. American Express – co-lead counsel – represented plaintiffs in nationwide consumer class action regarding deceptive business practices involving foreign currency conversion fees imposed on cardholders (S.D. Fla.).

Green v. Chase Manhattan Bank USA, N.A., et al. – co-lead counsel – represented plaintiffs in putative consumer class action against home equity line lenders regarding failure to comply with statutory requirements for reconveyance of deeds of trust (San Francisco Superior Court).

Silva, et al. v. Provident Funding Associates, L.P., et al. – co-lead counsel – represented plaintiffs in consumer class action regarding late fees charged by a mortgage service company (San Mateo County Superior Court).

Marshall, et al. v. H&R Block, Inc., et al. – representing putative nationwide class of tax preparation clients in deceptive business practices case (S.D. Illinois).

Mulligan v. Pacific Bell – co-lead counsel – represented plaintiffs in California consumer class action alleging violations of Bus. & Prof. Code § 17200 and California Consumer Legal Remedies Act (Alameda County Superior Court).

Citigroup Loan Cases – represented plaintiffs in nationwide consumer class alleging Bus. & Prof. Code § 17200 claims against lenders regarding deceptive and illegal lending practices to consumers (San Francisco Superior Court).

In re Kava Kava Litigation – represented plaintiffs in consumer class action arising from false advertising (Bus. & Prof. code § 17200 et seq.) and deceptive business practices in marketing and sale of Kava-Kava (Los Angeles County Superior Court).

Gordon v. Apple Computer – represented plaintiffs in consumer nationwide class action arising from sale of alleged defective computers (Bus. & Prof. Code § 17200) (Santa Clara County Superior Court).

Castro v. Providian – co-lead counsel – represented class of borrowers alleging Bus. & Prof. Code § 17200 claims arising from lender's imposition of unconscionable terms and interest charges on credit card lines (San Mateo County Superior Court).

Lavie v. Procter & Gamble – co-lead counsel – represented plaintiffs in consumer representative action – false advertising, Bus. & Prof. Code § 17200 claims (regarding OTC drug, including three week trial and appeal) (San Francisco Superior Court).

Littau v. Circuit City – co-lead counsel – represented plaintiffs in consumer class action – false advertising, Bus. & Prof. Code § 17200 claims against major electronics retailers (San Francisco Superior Court).

B. Antitrust

In re: Air Cargo Shipping Services Antitrust Litigation – representing putative classes of indirect purchasers of air cargo services against numerous airline defendants in price fixing conspiracy (E.D. NY).

In re: Digital Music Antitrust Litigation – representing putative class of purchasers of digital music and CDs against major music companies (S.D. NY).

In Re Flash Memory Antitrust Litigation – representing putative class of indirect purchasers of flash memory against major electronic companies in price fixing conspiracy (member of Executive Committee) (N.D. Cal.).

In re Graphics Processing Units Antitrust Litigation – represented putative class of indirect purchasers of graphic cards against major electronic companies in price fixing conspiracy (N.D. Cal.).

In re: International Air Transportation Surcharge Antitrust Litigation – representing putative class of ticket purchasers against some major airline carriers (N.D. Cal.).

In re: Static Random Access Memory (SRAM) Antitrust Litigation – representing class of indirect purchasers in price fixing conspiracy case against multiple SRAM manufacturers (N.D. Cal.).

In re: TFT-LCD (Flat Panel) Antitrust Litigation – representing class of indirect purchasers in price fixing conspiracy against manufacturers of flat panels for televisions and other products (N.D. Cal.).

In re: DRAM Antitrust Litigation – representing indirect purchasers of DRAM in putative class action involving price fixing conspiracy (member of Executive Committee) (N.D. Cal.). (Settlement pending.)

In re: Intel Corporation Microprocessor Antitrust – representing putative class of indirect purchasers of microprocessors from Intel (D. Del.).

In re: Visa/Mastercard Currency Conversion Litigation – representing certified class of plaintiffs in massive MDL antitrust/Truth In Lending Act action arising from imposition of foreign currency conversion fees by Visa, MasterCard, and banks (S.D. N.Y.). (Settlement pending.)

In re: CD Antitrust Litigation – represented plaintiffs in consolidated nationwide federal class action and antitrust/price fixing case involving music industry (D. Maine).

In re: NASDAQ Market-Makers Antitrust Litigation – represented plaintiffs in national class action price fixing case against 33 broker-dealer defendants (S.D. N.Y.).

C. Investment Fraud/Securities

Representing four hedge funds in securities litigation against public company.

In re: Asia Pulp & Paper Securities Litigation – represented class of investors in a securities fraud action (S.D.N.Y.).

William A. Brandt, Jr. v. Gordon A. Campbell, et al. – represented former CFO of bankrupt technology company in action brought by bankruptcy trustee against company's directors and officers (San Mateo County Superior Court).

In re: General Instrument Securities Litigation – MDL proceeding – represented group of investors including money managers who suffered multi-million dollar losses arising out of 1995 merger of private company with publicly traded company; action was coordinated with national securities class actions (N.D. Ill.).

In re: TMI Limited Partnership Litigation – co-lead counsel – represented approximately 20,000 school teachers who invested in 35 real estate limited partnerships in class action for fraud, breach of fiduciary duty, against general partners and Big 5 accounting firm (Orange County Superior Court).

Smith v. Merrill Lynch – represented plaintiffs in Orange County bond holder class action litigation (Orange County Superior Court and federal district court).

Klein v. Sacks – co-lead counsel – represented investors in real estate limited partnerships fraud scheme in class action against general partners and attorneys (Los Angeles Superior Court).

In re: Executive Life Litigation – represented plaintiffs in consolidated policy holder class actions against directors and officers and Big 5 accounting firm in fraud action (Los Angeles Superior Court).

ZZZZBest Litigation – represented Union Bank against Big 5 accounting firm that audited ZZZZBest (Los Angeles Superior Court and C.D. Cal.).

In re: American Continental Corporation/Lincoln Savings & Loan Securities Litigation – co-lead counsel – represented class of bond purchasers against three Big 5 accounting firms, Charles Keating and many other defendants – including a four month jury trial (D. Ariz.).

In re: Technical Equities Coordinated Litigation – represented hundreds of plaintiffs in fraud case against Bear Stearns, Big 5 accounting firm, Security Pacific National Bank and other defendants – including a three month jury trial (Santa Clara Superior Court).

D. Other Complex Litigation

Represented cofounder of high profile internet company in breach of fiduciary duty/fraud case.

Crown Paper Liquidating Trust v. PriceWaterhouseCoopers LLP – represented bankruptcy trustee in fraudulent conveyance and business tort action against multiple defendants (N.D. Cal.).

Peinado v. Board of Pilot Commissioners for the Bays of San Francisco, San Pablo and Suisun – co-lead counsel – represented plaintiffs in national origins class action discrimination lawsuit (San Francisco Superior Court).

Meris Labs v. Long Beach Memorial Hospital – represented subsidiary of nonprofit hospital in breach of contract/fraud case, including twelve week jury trial (Santa Clara Superior Court).

dZine v. Hyundai – represented Belgian company in breach of contract/fraud case arising from failure of computer chip, a component processing part of digital satellite transmission system, including six week trial (Santa Clara Superior Court).

Bank of America v. Lloyds of London – represented bank in multimillion dollar insurance coverage case (San Francisco Superior Court).

Ferguson v. National Football League – represented NFL in three week jury trial of wrongful termination suit filed by referee (Santa Clara Superior Court).

Exhibit 2

Ross, et al. v. Bank of America, N.A. (USA), et al., No. 05 CV 07116 (WHP)
 A related case in *In re Currency Conversion Fee Antitrust Litigation*, MDL No. 1409, Master File No. M21-95 (S.D.N.Y.)

Firm Name: Steyer Lowenthal Boodrookas Alvarez & Smith LLP

Reporting Period: Inception through May 1, 2010

Categories:

- | | |
|--|--|
| (1) Factual Investigation | (7) Litigation Strategy & Analysis |
| (2) Discovery | (8) Settlement Negotiations, Stipulation, Plan of Allocation |
| (3) Pleadings, Briefs & Pretrial Motions | (9) Trial Preparation & Trial |
| (4) Court Appearances | (10) Appeal |
| (5) Draft Initial or Amended Complaint | (11) Expert Witnesses |
| (6) Client / Shareholder Communications | |

Name	1	2	3	4	5	6	7	8	9	10	11	Total Hours	Rate(s)	Total Lodestar
D. Scott Macrae (A)	10.00	-	-	-	-	-	2.75	-	-	-	-	12.75	475	6,056.25
D. Scott Macrae (A)	-	-	0.75	-	-	-	0.50	-	-	-	-	1.25	500	625.00
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Exhibit 3

Ross, et al. v. Bank of America, N.A. (USA), et al., No. 05 CV 07116 (WHP)

A related case in *In re Currency Conversion Fee Anitrust Litigation*, MDL No. 1409, Master File No. M21-95 (S.D.N.Y.)

Firm Name: Steyer Lowenthal Boodrookas Alvarez & Smith LLP

Reporting Period: Inception through May 1, 2010

DESCRIPTION	TOTAL EXPENSES
Assessments	\$0.00
Legal Research -- Computer/Lexis/Westlaw	\$0.00
Court Fees	\$0.00
Court Reporters/Transcripts	\$0.00
Experts	\$0.00
In-House Photocopying	\$8.20
Outside Photocopying	\$0.00
Postage/Express Mail/Messenger	\$0.00
Long Distance Telephone/Facsimile	\$0.95
Travel	\$0.00
Witness/Service Fees	\$0.00
Other (describe)	\$0.00
TOTALS	\$9.15