

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: PORSCHE CARS NORTH
AMERICA, INC. PLASTIC COOLANT
TUBES PRODUCTS LIABILITY
LITIGATION**

Case No. 2:11-md-2233

**JUDGE GREGORY L. FROST
Magistrate Judge E.A. Preston Deavers**

This document relates to: ALL CASES.

NOTICE

Take notice that Plaintiffs' counsel presented the attached exhibit to opposing counsel and the Court at the March 10, 2014 Final Fairness and Attorneys' Fees Hearing in the above-captioned litigation.

**/s/ Gregory L. Frost
GREGORY L. FROST
UNITED STATES DISTRICT JUDGE**

Exhibit 1

Updated Attorneys' Fees Incurred from January 16, 2014, through February 28, 2014

Law Firm	Attorneys' Fees
Klein Kavanagh Costello, LLP	\$84,253.75
Cotchett Pitre & McCarthy LLP	\$27,433.00
Isaac, Wiles, Burkholder & Teetor, LLC	\$23,335.00
Grant & Eisenhofer, P.A.	\$16,187.50
Wolf Haldenstein Adler Freeman & Herz LLP	\$56,303.00 ¹
Bailey Peavy Bailey	\$0
Kohn Swift & Graf, P.C.	\$9,471.00
Schlanger & Schlanger, LLP	\$9,118.00
TOTAL:	<u>\$226,101.25</u>

Total Lodestar: \$3,713,191.00 (1.21 multiplier)

Several important tasks subsequent to February 28, 2014, are not included above, such as:

- preparing for and attending the Fairness Hearing;
- continuing to respond to class members' inquiries and administration issues through December 12, 2014 (and potentially beyond); and,
- preparing the supplemental notice and responding to the likely additional inquiries from class members that it will generate.

These tasks will further increase the Plaintiffs' lodestar and decrease the requested multiplier. This Exhibit is not intended to request additional attorneys' fees beyond the \$4,500,000 request in Plaintiffs' Application for Payment of Reasonable Attorneys' Fees, Reimbursement of Costs and Expenses, and Named Plaintiffs' Service Payments.

¹ The additional attorneys' fees attributable to Wolf Haldenstein came from the supplemental declaration from Partner Fred Isquith received too late to incorporate into the Plaintiffs' Application for Payment of Reasonable Attorneys' Fees, Reimbursement of Costs and Expenses, and Named Plaintiffs' Service Payments. See attached.

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**IN RE: PORSCHE CARS NORTH
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LITIGATION**

This document relates to:

ALL ACTIONS

Civil Action No.: 2:11-MD-2233

**Judge Gregory L. Frost
Magistrate Judge E. A. Preston Deavers**

SUPPLEMENTAL AFFIDAVIT

DANIEL W. KRASNER, being duly sworn, deposes and says:

1. I am a senior litigating partner at the firm Wolf Haldenstein Adler Freeman & Herz LLP, one of co-lead counsel for plaintiffs through on or about January 25, 2013 when the firm of Grant & Eisenhofer, P.A., was substituted for my Firm.
2. I submit this affidavit in support of the joint fee application of plaintiffs' counsel in this litigation. My Firm commenced one of the first of several class actions against Porsche relating to alleged defects in the plastic Coolant Pipes which have or may prematurely degrade and fracture, claiming that this defect can cause or has caused damage to various components of these vehicles' engines. We further alleged that defendants knew of this defect and failed to disclose it to consumers, their customers, when they purchased these vehicles. These claims were asserted under the Magnuson-Moss Warranty Act and several states' statutory and common laws for defendants' alleged breaches of implied warranty, common negligence and unfair and deceptive acts and practices.
3. During my Firm's incumbency as co-lead counsel, we performed various tasks, including, among others, the following:

- a. drafted one of the first class action complaints;
 - b. briefed and appeared before the MDL Panel with respect to consolidation of these various actions and transfer to this Court;
 - c. worked on the master Consolidated Amended Class Action Complaint;
 - d. worked on discovery requests;
 - e. reviewed documents and discovery materials produced by defendants;
 - f. worked on jurisdictional discovery requests and other related jurisdictional matters;
 - g. appeared telephonically and in person at hearings on discovery issues;
 - h. worked on the Opposition Brief to Defendants' Motion to Dismiss;
 - i. participated in extensive settlement negotiations before settlement mediator Thomas Rutter; and
 - j. worked on the settlement and mediation submissions for the settlement mediator.
4. My Firm devoted at least 1,275.50 attorney and paralegal hours to the prosecution and settlement of this action and our total lodestar for those hours at current hourly rates is \$864,588.50.¹ The hourly rates charged for this matter are the same hourly rates that we charge our hourly clients for similar services. My Firm's time charges were recently approved by the Court in *In re Direxion Shares ETF Trust*, 09 Civ. 8011 (KBF), Dkt. No. 201, (S.D.N.Y.).
5. A description of the Firm's litigation practice is annexed hereto as Exhibit A.

¹ We are using current hourly rates for all timekeepers, even those who switched firms during the pendency of this action.

6. The chart below summarizes the Firm's hourly charges from the inception of this action through December 16, 2013:

TIMEKEEPERS	STATUS	HOURLY RATE	TOTAL HOURS TO DATE	TOTAL LODESTAR TO DATE
Daniel W. Krasner	P	\$910.00	29.90	\$27,209.00
Fred T. Isquith	P	\$860.00	28.10	\$24,166.00
Adam J. Levitt ²	P	\$850.00	570.80	\$485,180.00
John E. Tangren	A	\$575.00	506.30	\$291,122.50
Justin M. Rosenblum	LC	\$285.00	6.00	\$1,710.00
Joseph Weiss	PL	\$310.00	16.90	\$5,239.00
James A. Cirigliano	PL	\$320.00	6.90	\$2,208.00
Jillaine E. Gill	PL	\$270.00	49.00	\$13,230.00
Luis D. Caraballo	PL	\$205.00	30.00	\$6,150.00
Sorah Kim	PL	\$265.00	31.60	\$8,374.00
TOTALS			1275.50	\$864,588.50

7. The Firm's disbursements to date are as follows:

DESCRIPTION	CUMULATIVE EXPENSES
Computer Research	\$11,705.50
Filing Fees	\$400.00
Internal Reproduction/Copies/Printing/Scanning	\$3,587.10
Litigation Fund Assessments	\$5,000.00
Postage/Express Delivery/Messenger	\$309.76
Secretarial Overtime	\$36.11
Service of Process	\$1,900.00
Telephone/Facsimile	\$660.88
Travel/Meals/Carfare	\$4,068.05
TOTAL EXPENSES	\$27,667.40

² Mr. Levitt resigned from the Firm on January 25, 2013. At that date he had not submitted his time for November and December, 2012 and January, 2013. On January 18, 2014, Mr. Levitt provided a listing of his time for that period which totaled 79.3 hours. While the recently submitted time is included in this chart, it was just provided to us by Mr. Levitt and was not contemporaneously recorded on the Firm's books and records.

These charges appear on my Firm's books and records maintained in the ordinary course of business and are recorded contemporaneously as incurred and as billed and paid and are an accurate record of the expenses incurred.

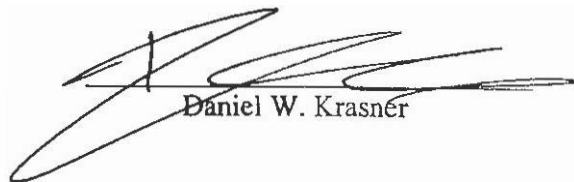
I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed on January 27, 2014



Sworn before me this 27th day
of January 2014

ROBERT ABRAMS
Notary Public, State of New York
No. 02AB5085291
Qualified in New York County
Commission Expires Sept. 22, 2017



Daniel W. Krasner

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
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5. A description of the Firm's litigation practice is annexed hereto as Exhibit A.

¹ We do not have current hourly rates for Mr. Levitt and Mr. Tangren so we have used their hourly rates as of the date that they left the Firm. See footnote 2.

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I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

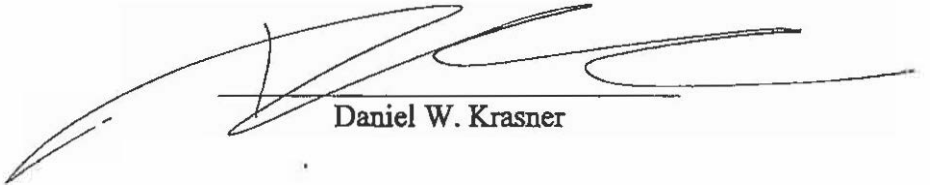
Executed on January 21, 2014

*Suorn before me this
21st day of January 2014*



MICHAEL JAFFE
Notary Public, State of New York
No. 31-5012542-025AG273273
Qualified in New York County
Commission Expires January 24, 2014

12/10/2016



Daniel W. Krasner