

Exhibit C

Value Hierarchy

Tier 1 - these are top tier because they were either dispositive, formed the basis for the overall case and therefore the ultimate settlement or both

- a. Courtroom argument and hearings - principle responsibility
- b. Actual questioning at depositions of Biomet employees
- c. Meetings and conference calls with Defendants negotiating CMOs
- d. Drafting Plaintiff Fact Sheet, several Requests for Production of Documents and Interrogatories, CMOs, 30(b)(6) deposition notices, and motions
- e. ESI protocol, policies and procedures
- f. Protocol, formation and supervision of electronic storage platform
- g. Expert work
- h. Settlement negotiations, drafting of the Master Settlement Agreement (MSA), and implementation of settlement procedures for the execution of the terms of the MSA
- i. Negotiation and drafting of the Common Benefit Settlement Agreement
- j. PSC liaison for all individual case mediations

Tier 2 - [some of these are a tier down because on case specific issues there was either a contingent recovery or the possibility of contingent recovery]

- a. Summarizing depositions
- b. Legal research and drafting memos on discovery issues
- c. Preparation for depositions listed in tier 1b by the principle questioner
- d. Review, investigation and objections concerning privilege logs provide by Defendant
- e. Settlement administration, including preparing funding reports, receipt of executed releases and design, management and oversight of the settlement website
- f. Secondary document review (after initial review, culling down relevant documents to truly hot documents)

Tier 3 -

- a. Preparation for depositions in tier 1b
- b. Preparation for status conferences
- c. Preparation for court argument on motions
- d. General meetings and conference calls of PSC
- e. Document review by an attorney

Tier 4 -

- a. Travel time
- b. Actual time at status conferences
- c. Contract attorney work
- d. Paralegal work
- e. Document review by a paralegal or contract attorney