

Exhibit 11

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
BEFORE THE HONORABLE CHARLES R. BREYER, U.S. DISTRICT JUDGE

JACQUELINE CORLEY, MAGISTRATE JUDGE
ROBERT S. MUELLER, III, SETTLEMENT MASTER

IN RE: VOLKSWAGEN "CLEAN DIESEL")
MARKETING, SALES PRACTICES, AND)
PRODUCTS LIABILITY LITIGATION,)
) Case No.
) 3:15-MD-02672-CRB

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REPORTER'S TRANSCRIPT OF
CASE MANAGEMENT CONFERENCE
THURSDAY, JANUARY 21, 2016
SAN FRANCISCO, CALIFORNIA

APPEARANCES:

FOR THE UNITED STATES OF AMERICA:

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(Appearances continued on Page 2)

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1 expenses, and you have to manage time, and I think your Honor's
2 pointed out those are two of the most important things in this
3 case, particularly if it proceeds along the settlement track.

4 So thank you for your consideration.

5 THE COURT: Thank you.

6 MR. SHADOWEN: Good afternoon, your Honor. Steve
7 Shadowen. I'm appearing on behalf of Bob Hilliard, who is on
8 trial with Judge Furman, in the Southern District of New York.

9 There are two aspects of this case that really call out for
10 the appointment of Mr. Hilliard to a leadership position. That
11 is, this is a social problem that involves people who are
12 injured, stakeholders, and decision-makers other than the
13 plaintiffs in this case, and there's going to be a need to
14 coordinate with those other decision-makers.

15 Secondly, these cars are still on the road, so there's a
16 need for speed in this litigation.

17 As one of the co-lead counsel in the GM ignition switch
18 litigation, Mr. Hilliard developed very close and trusting
19 relationships with the House and Senate Investigating
20 Committees.

21 Chairman Murphy of the House Oversight and Investigation
22 Committee, has already held hearings, will be hearing more, and
23 one of Bob's roles in the GM litigation was to coordinate --
24 just facilitate with those committees.

25 Similarly, Mr. Hilliard worked closely with Ken Fineberg in

1 developing the compensation protocols in that litigation.

2 And he also worked closely with Public Citizen and other
3 consumer advocacy groups.

4 With respect to speed, from the date that Bob and two other
5 co-lead counsel were appointed in the GM litigation, until the
6 start of the first bellwether trial in GM, in a case involving
7 124 deaths and thousands of injuries, 15 months, and Bob is the
8 lead trial counsel in that case, that's going on right now.

9 He's tracked over a hundred jury trials. He's a personable
10 guy who makes -- he's the grease that makes things happen. He
11 gets on the phone. He talks to people, and he's a guy that gets
12 things done.

13 THE COURT: So does he have time to do this?

14 MR. SHADOWEN: He does. We have the first trial. I
15 just got a text while I was sitting here that plaintiffs rested,
16 and that concludes our involvement in the bellwether cases
17 for GM.

18 There will be some other winding up, but I talked to Bob
19 specifically about that question, because I knew you would ask
20 it. He says he's ready to go starting next week.

21 THE COURT: Thank you.

22 MR. SHADOWEN: Thank you.

23 MR. BASSER: May it please the Court. Good morning,
24 your Honor. Stephen R. Basser of Barrack, Rosos & Bacine from
25 their San Diego office.