

EXHIBIT A

1 Complex Litigation Group LLC
2 Paul M. Weiss
3 513 Central Avenue, Suite 300
4 Highland, Park Illinois 60035
5 (847) 433-4500

6
7 *Counsel for Plaintiff(s) Jeffrey Rodgers*
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 In re APPLE iPHONE 4 PRODUCTS
13 LIABILITY LITIGATION

) Master File No. 5:10-md-02188-RMW

) CLASS ACTION

14 This Document Relates To:

15 ALL ACTIONS.

) DECLARATION OF PAUL M. WEISS
) FILED ON BEHALF OF COMPLEX
) LITIGATION GROUP LLC IN SUPPORT
) OF AN AWARD OF ATTORNEYS' FEES
) AND EXPENSES TO NON-LEAD
) COUNSEL

16 DATE: n/a
17 TIME: n/a
18 CTRM: The Honorable Ronald M. Whyte
19
20
21
22
23
24
25
26
27
28

1 I, Paul M. Weiss, declare as follows:

2 1. I am a member of the firm of Complex Litigation Group LLC f/k/a Freed &
3 Weiss LLC. I am submitting this declaration in support of my firm's application for an award of
4 attorneys' fees and expenses in connection with services rendered in the above-entitled action,
5 pursuant to the Court's order of September 13, 2012.

6 2. The firm is counsel of record for plaintiffs Jeffrey Rodgers. Our firm was not
7 appointed lead counsel in this consolidated MDL. I have not ever been paid or reimbursed any
8 fees or expenses in this case as of the filing of this document.

9 3. The identification and background of my firm and its partners is attached hereto
10 as Exhibit A.

11 4. The following information regarding the firm's time and expenses is taken from
12 time and expense printouts prepared and maintained by my firm in the ordinary course of
13 business. I am the attorney who oversaw and/or conducted the day-to-day activities in the
14 litigation and who reviewed these printouts (and backup documentation where necessary or
15 appropriate). The purpose of these reviews was to confirm both the accuracy of the entries on
16 the printouts as well as the necessity for and reasonableness of the time and expenses committed
17 to the litigation. As a result of these reviews, reductions were made to both time and expenses
18 either in the exercise of billing judgment or to conform to the firm's guidelines and policies
19 regarding certain expenses such as charges for hotels, meals, and transportation. As a result of
20 these reviews and adjustments, I believe that the time reflected in the firm's lodestar calculation
21 and the expenses for which payment is sought are reasonable in amount and were necessary for
22 the effective and efficient prosecution and resolution of the litigation.

23 5. The total number of hours spent on this litigation by my firm is 21.30 hours. The
24 total lodestar amount for attorney/paraprofessional time based on the firm's current rates is
25 \$10,714.00. The hourly rates shown below are the usual and customary rates charged for each
26 individual. A breakdown of the lodestar is as follows:

27

28

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Paul Weiss	(P)	14.80	\$655	\$9,694.00
Vincent Francone	(PL)	1.50	\$180	\$270.00
Deborah Searls	(PL)	5.0	\$150	\$750.00
TOTAL				\$10,714.00

(P) Partner

(PL) Paralegal

6. My firm is not seeking an award of expenses.

7. All of these hours were expended prior to the appointment of Lead Counsel on January 14, 2011. The work my firm did prior to that date includes drafting pleadings, research factual and legal issues and participating in conference calls with co-counsel.

8. I submit that the time submission included in this Declaration was incurred in this litigation. I request that the Court award my firm \$ 10,714.00 in attorneys' fees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 21st day of September, 2012, at Highland Park Illinois.



Paul M. Weiss