

EXHIBIT C

1 Michael F. Ram (SBN 104805)
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8 *Counsel for Plaintiff Christopher Dydyk*

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 MICHAEL F. RAM
) FILED ON BEHALF OF RAM, OLSON,
) CEREGHINO & KOPCZYNSKI 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

1 I, MICHAEL F. RAM, declare as follows:

2 1. I am a member of the firm of Ram, Olson, Cereghino & Kopczynski. I am
3 submitting this declaration in support of my firm's application for an award of attorneys' fees
4 and expenses in connection with services rendered in the above-entitled action, pursuant to the
5 Court's order of August 10, 2012.

6 2. The firm is counsel of record for plaintiff Christopher Dydyk. 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 17.40. Of that
24 total, 16.8 hours were spent in 2010, of which 16.3 were spent by Michael Ram and .5 by Karl
25 Olson (total lodestar for 2010 is \$12,600).

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1 The total lodestar amount for attorney/paraprofessional time based on the firm's current rates is
2 \$13,050. The hourly rates shown below are the usual and customary rates charged for each
3 individual in litigation of this kind. A breakdown of the lodestar is as follows:

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<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
M. RAM	(P)	16.30	\$750.00	\$12,225.00
K. OLSON	(P)	1.10	\$750.00	\$ 825.00
	(A)			
	(A)			
	(A)			
TOTAL		17.40		\$13,050.00

(P) Partner

(A) Associate

6. My firm seeks an award of \$494.00 in expenses which were reasonably and necessarily committed to the prosecution of the litigation. All of the expenses were incurred in 2010. They are broken down as follows:

EXPENSES

From Inception to May 21, 2012

<i>EXPENSE CATEGORY</i>	<i>TOTAL</i>
Out-of-Town Meals, Hotels & Transportation	\$ 0.00
Photocopies (in-house: 140 copies @ \$0.25 per page)	\$ 35.00
Postage & Delivery (MESSENGER)	\$109.00
Telephone, Facsimile	
Filing, Witness & Other Fees	\$350.00
Lexis, Westlaw, Online Library Research	
Mediation Fees	
TOTAL	\$494.00

7. The following is additional information regarding certain of these expenses:

(a) Out-of-town Meals, Hotels and Transportation: \$0.00.

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
N/A			

(b) Filing, Witness and Other Fees: \$350.00

<i>DATE</i>	<i>VENDOR</i>
6/30/2010	Clerk, USDC, Northern District of California

(c) Lexis, Westlaw, Online Library Research: \$0.00.

8. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records and other documents and are an accurate record of the expenses.

9. I submit that the time and expense submission included in this Declaration were incurred in this litigation. I request that the Court award my firm \$13,050.00 in attorneys' fees and \$494.00 in expenses reimbursement for a total of \$13,544.00.

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 San Francisco, California.

/s/ Michael F. Ram
 Michael F. Ram

ROCK LLP

9/20/2012

Client Slips

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Selection Criteria

Slip Classification	Open
Slip Date	Earliest - 9/20/2012
Time Selection	Exclude: Expense
Clie Selection	Include: Apple_iPhone.Class

Slip ID	Dates and Time	Timekeeper Activity Client Reference	Units	Rate	Slip Value
<u>Client: Apple iPhone.Class</u>					
95744	TIME 7/1/2010	MFR Analysis Apple_iPhone.Class	5.30	750.00	3975.00
	WIP				
	Review Complaint; emails and telephone calls with co-counsel; research re causes of action.				
95751	TIME 7/6/2010	MFR Analysis Apple_iPhone.Class	1.80	750.00	1350.00
	WIP				
	Review background information including Apple response and criticism of Apple response; review motion to relate cases and proposed order.				
95758	TIME 7/6/2010	MFR Analysis Apple_iPhone.Class	1.40	750.00	1050.00
	WIP				
	Emails and telephone calls with co-counsel, review Complaints from other courts.				
95761	TIME 7/6/2010	KO Analysis Apple_iPhone.Class	0.30	750.00	225.00
	WIP				
	Confer with, and correspondence from and to, M. Ram re judicial assignment, his call with P. Prevolos, status and new cases.				
95776	TIME 7/7/2010	KO Analysis Apple_iPhone.Class	0.10	750.00	75.00
	WIP				
	Confer with and correspondence from and to M. Ram re other cases and possible MDL, contact from P. Prevolos.				

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Client Slips

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Reference	Units	Rate	Slip Value
95783	7/9/2010	WIP	Review MDL pleadings and briefs re motion to relate.	MFR	Analysis	Apple_iPhone.Class		2.60	750.00	1950.00
95800	7/12/2010	WIP	Draft brief re motion to relate cases; emails to co-counsel; and review factual materials.	MFR	Analysis	Apple_iPhone.Class		4.30	750.00	3225.00
95836	7/15/2010	WIP	Attention to news account re Apple knowledge of design flaw; confer with M. Ram re same.	KO	Analysis	Apple_iPhone.Class		0.10	750.00	75.00
95854	7/19/2010	WIP	Review factual information from Internet, conference call with co-counsel.	MFR	Analysis	Apple_iPhone.Class		0.90	750.00	675.00
103934	4/25/2012	WIP	Correspondence from and to co-counsel; supervise compilation of lodestar information and transmission to co-counsel.	KO	Analysis	Apple_iPhone.Class		0.30	750.00	225.00
106117	8/23/2012	WIP	Correspondence from and to co-counsel re status, court's order and submission of declaration.	KO	Analysis	Apple_iPhone.Class		0.30	750.00	225.00
106137	8/23/2012	WIP	Correspondence from and to co-counsel re declaration; review and revise declaration.	KO	Analysis	Apple_iPhone.Class		0.30	750.00	225.00
Total: Apple_iPhone.Class								17.70		13275.00
								Billable		

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Slip ID	Timekeeper			
Dates and Time	Activity			
Status	Client			
Description	Reference	Units	Rate	Slip Value
	Unbillable	0.00		0.00
	Total	17.70		13275.00
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Grand Total	Billable	17.70		13275.00
	Unbillable	0.00		0.00
	Total	17.70		13275.00

ROCK LLP

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Client Slips

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Selection Criteria

Slip Classification Open
 Slip Date Earliest - 9/20/2012
 Client Selection Include: Apple_iPhone.Class
 Time Selection Include: Expense

Slip ID	Dates and Time	Status	Description	Timekeeper Activity	Client Reference	Units	Rate	Slip Value
<u>Client: Apple iPhone.Class</u>								
95767	7/7/2010	EXP	WIP Filing of Complaint on June 30, 2010 (left with court for processing for pick-up the next day).	Expense Messenger	Apple_iPhone.Class	1	40.00	40.00
95768	7/7/2010	EXP	WIP Picked up filed-endorsed complaint from June 30, 2010).	Expense Messenger	Apple_iPhone.Class	1	40.00	40.00
95769	6/30/2010	EXP	WIP Filing Fees (Complaint)	Expense Filing Fees	Apple_iPhone.Class	1	350.00	350.00
95914	7/9/2010	EXP	WIP FedEx	Expense FedEx/Postage	Apple_iPhone.Class	1	29.00	29.00
95928	7/30/2010	EXP	WIP In-House Copying	Expense In-House Copying	Apple_iPhone.Class	175	0.20	35.00
Total: Apple_iPhone.Class								
						Billable	0.00	494.00
						Unbillable	0.00	0.00
						Total	0.00	494.00

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Slip ID	Timekeeper			
Dates and Time	Activity			
Status	Client			
Description	Reference	Units	Rate	Slip Value
Grand Total	Billable	0.00		494.00
	Unbillable	0.00		0.00
	Total	0.00		494.00