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*Lead Counsel for Plaintiffs and the Proposed Class
and for Plaintiff Adrian Cendejas*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AGUSTIN CACCURI et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SONY INTERACTIVE ENTERTAINMENT
LLC,

Defendant.

Case No. 21-cv-03361-AMO

**DECLARATION OF MICHAEL M.
BUCHMAN AND SAVERI LAW FIRM, LLP
IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Honorable Araceli Martínez-Olguín

1 I, Michael M. Buchman, respectfully submit this Declaration and hereby declare as follows
2 to the best of my knowledge:

3 1. I, Michael M. Buchman, am a partner at the Saveri Law Firm LLP (“SLF”). I am
4 admitted to the practice of law in the states of New York and Connecticut. I am admitted *pro hac*
5 *vice* to practice in the Northern District of California for this matter. ECF No. 20. I am Court-
6 appointed Lead Counsel in this matter. ECF No. 35. I make this Declaration based on my own
7 personal knowledge. If called upon to testify, I could and would testify competently to the truth of
8 the matters stated herein.

9 2. I have personal knowledge of the facts below and, if called upon to do so, could and
10 would testify competently thereto. I make this Declaration, pursuant to 28 U.S.C. § 1746, in support
11 of Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Service Awards. I joined the Saveri Law
12 Firm (“SLF”) as a partner in February of 2026, but have worked closely with SLF over the past few
13 years on this and other cases. SLF is an experienced class action, antitrust, and complex civil
14 litigation firm. SLF attorneys have been sole lead, co-lead, and members of the executive
15 committee or plaintiffs’ steering committee on antitrust matters in various business sectors,
16 including In Re Capacitors Antitrust Litig., No. 3:14-cv-03264-JD, 3:17-md-02801-JD (N.D. Cal.);
17 In Re High-Tech Employees Antitrust Litig., No. 5:11-cv-02509-LHK (N.D. Cal.); In re Restasis
18 Antitrust Litig., No. 1:18-md-02819-NG-LB (E.D.N.Y.); Le v. Zuffa, LLC, No. 2:15-cv-01045-
19 RFB-BNW (D. Nev); Robinson v. Jackson Hewitt Inc, No. 2:19-cv-9066-MEF (D.N.J.); and In re
20 Xyrem (Sodium Oxybate) Antitrust Litigation, No. 3:20-md-02966-RS (N.D. Cal.).

21 **I. OVERVIEW**

22 **A. Work Performed for the Benefit of the Settlement Class**

23 3. SLF has participated in the prosecution of this litigation on behalf of the Settlement
24 Class. The work performed by the Firm at the direction of Lead Counsel included:

- 25 • Investigation, Complaint and Initiation of Litigation: SLF undertook significant
26 efforts to develop the factual basis and legal claims of Plaintiffs in this case. SLF
27 undertook an extensive prefiling investigation concerning the monopolization
28

claims in this case. SLF consulted with its client, Adrian Cendejas, regarding his digital game purchases and potential damages. SLF filed a class action complaint on behalf of Adrian Cendejas and other similarly situated video game purchasers. *Cendejas v. Sony Interactive Entertainment LLC et al.*, Case No. 21-cv-03447, ECF No. 1.

- Discovery: SLF undertook significant discovery efforts in this case. SLF attorneys worked with Adrian Cendejas in the preparation of responses to Defendants' written discovery. SLF gathered, reviewed and produced Adrian Cendejas' documents in response to Defendant's document requests. SLF also evaluated and analyzed defendant's discovery responses. SLF participated extensively in the review of documents produced by Defendant. SLF led: (i) discovery meet and confers with Sony; (ii) meet and confers with third party The Value Engineers; and (iii) participated in meet and confers with Sony regarding client Adrian Cendejas's document production. SLF began to prepare Adrian Cendejas's for his deposition. SLF also extensively reviewed documents and data produced by SIE during the course of the litigation.
- Dispositive Motions: SLF attorneys assisted in the research and drafting of: (i) case management statements; (ii) two oppositions to motions to dismiss, and (iii) the opposition to Sony's motion to preemptively deny class certification.

B. Lodestar Summary

4. SLF's attorneys and staff kept contemporaneous records of the time they spent on this litigation. Reports that reflect the contemporaneous time entries for the work performed by SLF were drafted and reviewed by SLF attorneys. Lead Counsel and SLF have audited SLF's daily time records. Lead Counsel is authorized SLF to submit SLF's time records for *in camera* review if requested by the Court.

5. The total number of hours spent by SLF prosecuting this litigation through December 31, 2025 is 2908.45 with a corresponding lodestar at historical rates of \$1,509,455.50. The lodestar does not include any time related to the appointment of class counsel, or after December 31, 2026.

6. The following summary chart identifies the individuals who worked on this matter, their titles (Partner, Associate, Staff Attorney, Paralegal, Litigation Staff), the total number of hours they worked, their historic hourly billing rates, and their total lodestar. Detail concerning the work performed by key individuals is set forth below.

Timekeeper	Title	Rates (Historical)	Hours	Lodestar
Aaron Cera	Associate	350.00	16.45	5,757.50
Aaron Cera	Associate	550.00	0.6	330.00
Alice Ilie	Paralegal	450.00	5.1	2,295.00
Ame Ortiz	Litigation Staff	400.00	5	2,000.00
Anupama Reddy	Associate	500.00	59.9	29,950.00
Ashleigh J. Jensen	Paralegal	425.00	0.6	255.00
Ashleigh J. Jensen	Paralegal	625.00	4.2	2,625.00
Bridget Kilkenny	Paralegal	550.00	4.5	2,475.00
Christopher Hydal	Associate	800.00	64.3	51,440.00
Christopher Young	Partner	500.00	14	7,000.00
Dan Meter	Litigation Staff	350.00	5	1,750.00
Daniel VanDeMortel	Litigation Staff	385.00	6.5	2,502.50
David Lerch	Associate	750.00	0.4	300.00
Dwayne Lockett	Paralegal	385.00	5.2	2,002.00
Elissa Buchanan	Associate	525.00	3.5	1,837.50
Elissa Buchanan	Associate	550.00	196.3	107,965.00
Elissa Buchanan	Associate	650.00	306.6	199,290.00
Gurjit Aulkh	Paralegal	400.00	10.5	4,200.00
Gurjit Aulkh	Paralegal	425.00	5	2,125.00
Itak Moradi	Associate	800.00	2.4	1,920.00
Jacquelyn Lindsey	Staff Attorney	340.00	374.2	127,228.00
Joseph R. Saveri	Partner	1,150.00	35.1	40,365.00

Timekeeper	Title	Rates (Historical)	Hours	Lodestar
Joseph R. Saveri	Partner	1,200.00	2.8	3,360.00
Joseph R. Saveri	Partner	1,400.00	31.3	43,820.00
Julie Hill	Paralegal	450.00	1	450.00
Katharine Malone	Associate	625.00	10.5	6,562.50
Kevin Rayhill	Associate	800.00	0.6	480.00
Nanci Murdock	Litigation Staff	340.00	653.6	222,224.00
Ronnie S. Spiegel	Partner	945.00	101.6	96,012.00
Ronnie S. Spiegel	Partner	995.00	3.4	3,383.00
Ronnie S. Spiegel	Partner	1,200.00	173.2	207,840.00
Ronnie S. Spiegel	Partner	1,250.00	0.3	375.00
Ruby Ponce	Paralegal	445.00	16.7	7,431.50
Ruby Ponce	Paralegal	625.00	24.4	15,250.00
Rya Fishman	Paralegal	400.00	34.9	13,960.00
Rya Fishman	Paralegal	450.00	80.1	36,045.00
Sofia Jordan	Litigation Staff	650.00	5.2	3,380.00
Steven Williams	Partner	1,150.00	7	8,050.00
Steven Williams	Partner	1,200.00	33.5	40,200.00
Zachary Lee	Litigation Staff	340.00	603	205,020.00
Grand Total:			2908.45	\$1,509,455.50

C. Staffing and Tasks Performed on This Matter

7. SLF staffed this matter with attorneys and professionals who performed tasks based on their skills, expertise, and experience. The individuals who worked primarily on this matter and the tasks they performed are described below:

- Joseph Saveri (Partner): Oversaw SLF team; managed the investigation, drafting and filing of complaint; attended and participated in case management meetings; drafted, reviewed and revised pleadings; supervised defensive discovery tasks for plaintiffs and client Adrian Cendejas.

- 1 • Steve Williams (Partner): Oversaw SLF team; managed projects focused on
- 2 discovery; supervised defensive discovery tasks for plaintiffs and client Adrian
- 3 Cendejas.
- 4 • Elissa Buchanan (Associate): Worked on various discovery projects on the case;
- 5 performed offensive and defensive discovery tasks for plaintiffs and client Adrian
- 6 Cendejas; conducted meet and confers with Sony and third parties; performed
- 7 research and drafted portions of the opposition to Defendants motion to preemptively
- 8 deny class certification; and drafted letters and memoranda related to discovery
- 9 disputes.
- 10 • Anupama Reddy (Associate): Researched and drafted the Complaint; worked on
- 11 projects related to initial discovery; met and conferred with Sony related to custodial
- 12 and other discovery issues; performed research and analysis, focused on custodians;
- 13 and performed various defensive discovery tasks for plaintiff Adrian Cendejas.

14 II. HOURLY RATES

15 8. The historical hourly rates submitted by SLF in this matter are the Firm's usual and

16 customary rates charged by the Firm in similar contingent matters, as well as the Firm's

17 noncontingent matters.

18 9. SLF's hourly rates, including the rates for specific timekeepers that worked on this

19 matter, were recently approved by courts in the following cases in connection with the payment of

20 attorneys' fees from recoveries in class action matters:

- 21 • *In re Capacitors Antitrust Litig.*, No. 3:14-cv-03264-JD, 3:17-md-02801-JD (N.D.
- 22 Cal.);
- 23 • *In re Restasis Antitrust Litig.*, No. 1:18-md-02819-NG-LB (E.D.N.Y.);
- 24 • *Jones v. Varsity Brands, LLC*, No. 2:20-cv-02892 (W.D. Tenn.);
- 25 • *Le v. Zuffa, LLC*, No. 2:15-cv-01045-RFB-BNW (D. Nev.);
- 26 • *Robinson v. Jackson Hewitt Inc.*, No. 2:19-cv-9066-MEF (D.N.J.); and
- 27
- 28

- *In re Xyrem (Sodium Oxybate) Antitrust Litigation*, No. 3:20-md-02966-RS (N.D. Cal.).

III. LITIGATION EXPENSES

10. Below is an itemized list of the unreimbursed expenses SLF incurred during the prosecution of this litigation while performing work assigned by Lead Counsel. Those expenses are reflected in the Firm's books and records that are regularly maintained in the ordinary course of the Firm's business and are based on the receipts and data maintained by the Firm.

Category	Amount Incurred
Computer Research	\$142,807.06
Court Reporters / Transcripts	\$B2.50
Experts	\$35,761.46
Filing Fees	\$719.00
Travel / Meals / Hotels / Transportation	\$385.24
Photocopies	\$1,017.25
Postage / Delivery Services	\$6,331.46
Data Hosting	\$8,544.00
Total:	\$195,597.97

11. The expenses listed above—including computer research—were incurred specifically for this case and do not include any costs for general firm overhead.

IV. WORK WITH CLASS REPRESENTATIVE ADRIAN CENDEJAS

12. SLF are the attorneys for Adrian Cendejas, the Class Representative in this case. SLF worked with Adrian Cendejas during the prefiling investigation of the case, including investigation and analysis of overcharges paid as a result of Defendant's anticompetitive conduct. SLF worked with Adrian Cendejas in order to respond to discovery served by Defendants. In responding to discovery, Adrian Cendejas met with counsel many times to discuss the requests, searched for and produced documents from files dating back to 2016, provided information in response to interrogatories, conferred with counsel regarding game purchases and costs, prepared for the Early Neutral Evaluation and a potential deposition, and conferred with counsel regarding settlement. Mr. Adrian Cendejas devoted substantial time to responding to discovery in this matter and fully performed his duties and responsibilities as a Class Representative. Following the filing of his

1 complaint, over the course of the litigation, SLF apprised Adrian Cendejas of the progress and
2 status of the litigation.

3 13. SLF will not seek payment for work, lodestar, or expenses related to this litigation
4 other than those set forth in this Declaration.

5
6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct to the best of my knowledge. Executed on June 17, 2026 in New York, New
8 York.

9
10 /s/ Michael M. Buchman
11 Michael M. Buchman
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