

EXHIBIT C

1 Jeff S. Westerman (SBN 94559)
jwesterman@ahdootwolfson.com
2 **AHDOOT & WOLFSON, PC**
2600 W. Olive Avenue, Suite 500
3 Burbank, CA 91505
4 Telephone: (310) 474-9111
Facsimile: (310) 474-8585
5

6 *Counsel for Plaintiffs Augustin Caccuri*

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **OAKLAND DIVISION**
10

11
12 AGUSTIN CACCURI et al., on behalf of
themselves and all others similarly situated,
13

14 *Plaintiffs,*

15 v.

16 SONY INTERACTIVE ENTERTAINMENT
LLC,
17

18 *Defendant.*

Case No. 21-cv-03361-AMO

**DECLARATION OF JEFF WESTERMAN IN
SUPPORT OF MOTION FOR ATTORNEYS'
FEES, EXPENSES, AND SERVICE AWARDS**

Honorable Araceli Martínez-Olguín

Date: October 15, 2026

Time: 2:00 p.m.

Location: Oakland Courthouse

1 I, Jeff Westerman hereby declare as follows:

2 1. During the course of work performed on this case, I was the owner of my own firm,
3 Westerman Law Corp. (“WLC”), Of Counsel at Zimmerman Reed LLP (“ZR”) and currently Of Counsel
4 at Ahdoot & Wolfson, PC. In those roles, I was local counsel for Lead Counsel Michael M. Buchman
5 and in that role represented the interests of the class. I am admitted to the practice of law in the State of
6 California and each of the Federal Districts in California, including the Northern District. This
7 Declaration is submitted in support of Class Counsel’s Motion for Attorneys’ Fees, Expenses, and Service
8 Awards. As the primary attorney at WLC and then ZR (which I joined on February 1, 2003), I was
9 responsible for overseeing each Firms’ work in this matter. My current firm, Ahdoot & Wolfson, which
10 I joined at the end of 2025, is not applying for fees or expenses in this case. I have personal knowledge
11 of the facts set out in this Declaration and, if called upon to do so, could and would testify competently
12 thereto. I make this declaration pursuant to 28 U.S.C. § 1746 in support of Plaintiffs’ Motion for
13 Attorneys’ Fees, Expenses, and Service Awards.

14 2. Both WLC and ZR are experienced class action, antitrust, and complex civil litigation firms.
15 Either I or attorneys at those firms have been sole Lead, Co-Lead, or a member of the Executive
16 Committee or Plaintiffs’ Steering Committee on matters with various claims including antitrust.

17 3. WLC was, and ZR is an experienced class action, antitrust, and complex civil litigation
18 firm. Attorneys at the firms, including myself, have been sole Lead, Co-Lead, and members of the
19 Executive Committee on numerous complex class matters in various business sectors. A copy of my CV
20 is attached as **Exhibit A**. See also <https://www.ahdootwolfson.com/attorneys/jeff-westerman/>. For ZR,
21 please see <https://www.zimmreed.com/>. A few of those notable actions where I was Lead or Co-Lead
22 counsel are:

- 23 i. Judge Otero in the Central District of California appointed me as one of three Co-Lead
24 Counsel over a group of about 80 plaintiff attorneys, *In Re Korean Air Lines Co., LTD*
25 *Antitrust Litigation*, MDL No. 1891; Master File No. CV 07 05107 SJO (AGRx). That
26 case resulted in separate settlements with the two defendants for a total of \$89 million.

- ii. Judge Ware appointed me as sole lead counsel over *The Nvidia GPU Litigation*,
consumer class case re defective graphic processor units. This case settled with multi-
pronged relief with estimated reimbursement, repair, replace and expense value to
class of over \$400 million.
- iii. *In Re Chase Bank USA, N.A. "Check Loan" Contract Litigation*, MDL No. 2032; Case
No.3:09-md-02032 MMC (JL) (N.D. Cal.), settled in 2012 for \$100 million. Chase
was alleged to have acted in bad faith in changing the payment terms of about 1 million
cardholder/class members. I was a member of the Executive Committee.

I. OVERVIEW

A. Work Performed for the Benefit of the Settlement Class

4. I have served as Local Counsel for the Lead Counsel Michael M. Buchman. We have worked together for approximately 20 years. I participated in the prosecution of this litigation on behalf of the Settlement Class. Mr. Buchman conferred with me on most significant issues in the case. He included me in consultations with the damages expert, preparation for and participation in the Court ordered Early Neutral Evaluation (ENE) and subsequently in the mediation with Mr. Christopher Hockett. Throughout the course of this case, I participated in the preparation of every brief, joint report, discovery request, and attended meet and confers with defendant or third-parties. I also assisted Mr. Buchman in preparation for hearings. I, and consequently WLC and/or ZR performed the following work in this matter:

- a. Investigation, Complaint and Initiation of Litigation: I was tasked with doing significant research and strategizing regarding the Sony arbitration provision and the possibility that Sony would assert it to keep these claims out of Court.
- b. Discovery: I worked with co-counsel in the preparation of responses to Defendants' written discovery. I worked on obtaining discovery and in particular negotiated contested portions of the stipulated confidentiality protective order and met and conferred extensively with Sony's counsel, including exchanging multiple drafts of a joint discovery statement that ultimately led to an agreement before it was submitted

1 to the court. I and ZR were tasked with conducting the discovery and meet and confer
2 efforts to obtain non-party retailer information, particularly with regard to volume and
3 sales for use by the damages experts. I was also involved in many interactions with
4 the experts. I also arranged for ZR to provide attorney document review assistance,
5 which enabled timely review of the documents.

6 c. Dispositive Motions:

7 (i) I worked on the opposition briefs to the 3 motions to dismiss filed by Sony. I also
8 worked on amending the complaints following the motions to dismiss that
9 resulted in an amended complaint being upheld so that the case could proceed.

10 (ii) I also worked on the opposition to Sony's pre-emptive motion to deny class
11 certification which also asserted issues relating to arbitration and a claimed class
12 action waiver, and on the hearing preparation, and I attended the hearing.

13 d. ENE, Mediation and Settlement: I worked on the ENE statement and preparation of
14 the ENE presentation with Mr. Buchman and I frequently interacted with Mr. Hockett
15 who conducted the ENE and later served as the mediator who facilitated settlement
16 discussions in this case.

17 **B. Lodestar Summary**

18 5. WLC and ZR attorneys and staff kept contemporaneous records of the time they spent on
19 this litigation. Reports that reflect the contemporaneous time entries for the work performed by WLC and
20 ZR were reviewed by me and Lead Counsel and duplicate, mistaken or incorrect entries were removed.
21 Lead Counsel has and is authorized to submit my 2 former firm's time records for *in camera* review if
22 requested by the Court.

23 6. Neither I nor ZR used litigation funding in connection with this case.

24 7. The total number of hours spent by WLC and ZR prosecuting this litigation through
25 December 31, 2025, is **1,668.95** with a corresponding total lodestar at historical rates of **\$1,111,580.50**.
26 The lodestar does not include any time after December 31, 2025, and this does not include over \$12,400
27
28

in time that I and paralegals at my current firm Ahdoot & Wolfson already incurred and will continue to incur for the final approval and fee and expense proceedings.

8. The following summary chart identifies the individuals at Westerman Law who worked on this matter, their titles (Partner, Of Counsel, Associate, Paralegal, Litigation Staff), the total number of hours they worked, their historic hourly billing rates, and their total lodestar. Additional detail concerning the work that I supervised that was performed by each of these individuals at WLC is set forth above.

Personnel	Title	Hours	Rate(s)	Lodestar
Jeff S. Westerman	Owner	64.6	\$925	\$59,755.00
Jeff S. Westerman	Owner	112.1	\$985	\$110,418.50
Guido Toscano	Associate	68.6	\$680	\$46,648.00
Guido Toscano	Associate	20.5	\$690	\$14,145.00
Georgia Skoumbis	Associate	3.5	\$690	\$2,415.00
Total		269.3		\$233,381.50

9. The following summary chart identifies the individuals at ZR who worked on this matter, their titles (Partner, Of Counsel, Associate, Paralegal, Litigation Staff), the total number of hours they worked, their historic hourly billing rates, and their total lodestar. Additional detail concerning the work performed by each of these individuals supervised by me is set forth above.

Personnel	Title	Hours	Rate(s)	Lodestar
J. Gordon Rudd, Jr.	Owner	1.25	\$975	\$1,218.75
J. Gordon Rudd, Jr.	Owner	0.25	\$1,025	\$256.25
J. Gordon Rudd, Jr.	Owner	0.5	\$1,100	\$550.00
David M. Cialkowski	Owner	22.8	\$925	\$21,090.00
David M. Cialkowski	Owner	3.8	\$975	\$3,705.00
Jeff S. Westerman	Of Counsel	205.3	\$985	\$202,220.50
Jeff S. Westerman	Of Counsel	197.8	\$1,025	\$202,745.00
Jeff S. Westerman	Of Counsel	20.4	\$1,100	\$22,440.00
C. Richard Hansen	Associate	0.3	\$650	\$195.00
C. Richard Hansen	Associate	233.6	\$670	\$156,512.00
Georgia Skoumbis	Associate	3.7	\$680	\$2,516.00
Zachary J. Freese	Associate	93.5	\$575	\$53,762.50
Zachary J. Freese	Associate	6.2	\$590	\$3,658.00

Ryan P. Griffin	Document Reviewer	595.75	\$340	\$202,555.00
Julianne VanNorman	Paralegal	3.7	\$350	\$1,295.00
Josephine Lu	Paralegal	9.3	\$350	\$3,255.00
Kathryn Kalland	Paralegal	1.5	\$150	\$225.00
Total		1,399.65		\$878,199.00

C. Staffing and Tasks Performed on This Matter

10. WLC and ZR staffed this matter with the attorneys and professionals listed on the charts above, who performed tasks based on their skills, expertise, and experience. I supervised the attorneys and staff work at both WLC and ZR. These attorneys worked with me in researching and drafting or editing briefs, participated in discovery, meet and confers and assisted with various aspects of discovery, including some document review. At ZR I also reported to Managing Partner Gordon Rudd and Antitrust Partner David Cialkowski who each billed some time in connection with discussions I had with them, or other work they performed regarding case status, strategy and advice or input they provided on some areas as the case proceeded.

II. HOURLY RATES

11. The historical hourly rates submitted by WLC and ZR in this matter are the firms' usual and customary rates charged by the firm in similar matters in which the firms are paid on a contingent basis, as well as the firm's noncontingent matters. My recent hourly rate of \$1,100, and the various historical rates for me and some or all of the specific timekeepers that worked on this matter (or timekeepers of relatively similar experience), were approved by courts in the following cases in connection with the payment of attorneys' fees from recoveries in class action matters.

As to WLC and ZR:

IN RE: XYREM (SODIUM OXYBATE) ANTITRUST LITIGATION, Case No. 3:20-md-02966-RS in October 2025.

As to Westerman Law:

See In Re Woodridge Investments Litigation, Case 2:18-cv-00103-DMG-MRW, Document 207, filed 12/17/21.

As to Zimmerman Reed:

See Class Counsel's Motion For Attorneys' Fees, Reimbursement of Costs And Expenses, and Service Awards And Memorandum In Support Thereof, in *Wilson et al. v FCA US LLC*, Case 4:22-cv-00447-ALM, Document 64-4, filed 03/06/25, page 1 of 5, page ID #:1111, et seq.; and Order Granting Motion for Attorneys' Fees Reimbursement of Costs and Expenses, and Service Awards, 4:22-cv-00447-ALM, Document 68, filed 04/11/25, page 1 of 3, page ID #: 1348.

III. LITIGATION EXPENSES

12. Below is an itemized list of the unreimbursed expenses WLC and ZR incurred during the prosecution of this litigation while performing work assigned by Lead Counsel. WLC's expenses were only about \$37 of this total, the rest are from ZR. Those expenses are reflected in the firms' books and records that are regularly maintained in the ordinary course of business and are based on the receipts and data maintained by the firms.

Category	Amount Incurred
Computer Research	\$2,801.06
Filing Fees	\$328.00
Photocopies	\$36.60
Postage / Delivery Services	\$465.30
Total:	\$3,630.96

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

14. WLC and ZR will not seek payment for work, lodestar, or expenses related to this litigation other than those set forth in this declaration.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on June 17, 2026 at Los Angeles, California.

/s/ Jeff Westerman
Jeff Westerman

EXHIBIT A

**JEFF S. WESTERMAN****AHDOOT & WOLFSON PC**[HTTPS://WWW.AHDOOTWOLFSON.COM/](https://www.ahdootwolfson.com/)**Practice Areas:****Securities & Investor Litigation****Consumer/Privacy Litigation****Antitrust Litigation**

Mr. Westerman practices in the areas of securities fraud, investor, consumer, privacy and antitrust class actions, shareholder derivative actions, and corporate mergers and acquisitions litigation. He has served as lead or co-lead counsel in cases resulting in significant corporate governance changes and resulting in recoveries and recognized increased value to plaintiffs totaling more than \$2 billion. In 2005, *The Daily Journal* recognized him as one of the top 30 securities litigators in California. In 2013 he was a finalist for the Consumer Attorneys of California, Consumer Attorney of the Year, for *In Re Chase Bank USA, N.A. "Check Loan" Litigation* that settled for \$100 million. In 2013 Mr. Westerman was also co-lead counsel on *In Re Medical Capital Securities Litigation* that settled for \$219 million, and *In Re Korean Airlines Co., LTD. Antitrust Litigation* which settled for a total of \$86 million.

Mr. Westerman has served as a moderator or speaker for programs on complex litigation, class actions, settlements, the Sarbanes-Oxley Corporate Responsibility Act, shareholder actions, motions and trends in litigation. He is a co-author of "Preparing For And Participating In The Mediation Session" in *Financial Services Mediation Answer Book*, Layn Phillips et al Editor (PLI 2017).

Mr. Westerman was a member (2001-2003, 2024-27) and Co-Chair (2002-2003) of the Central District of California Attorney Delegation to the United States Ninth Circuit Judicial Conference. He served on the Central District of California, U.S. Magistrate Judge Merit Selection Panel (2003-early 2014). He served on the U.S. Central District of California Standing Committee on Attorney Discipline and was appointed Vice Chair in 2011, and Chair 2014 to 2017. He was also a member of the Central District of California Attorney Settlement Officer Panel (1998-2022).

He also served as: President of the Association of Business Trial Lawyers (2004-2005); on the Board of Governors (1997-2005), Treasurer (2001-2002), Secretary (2002-2003), Vice President (2003-2004). He is a past President (2020-2021) of the Los Angeles, Federal Bar Association Chapter; and Board Member (2003-present) and Finance Committee Member. He was Chair and now Vice Chair of Path to the Bench Committee of Consumer Attorneys Association Los Angeles (2023-present).

For 2025-2027 Mr. Westerman is Treasurer and Chair of the Finance Committee of the Los Angeles County Bar Association ("LACBA"). Mr. Westerman was LACBA Assistant Vice President (2022-25). Mr. Westerman was the Chair of the LACBA Litigation Section, with over 2,000 members (2013-14), and a Board Trustee (2014-2016). He has been a member of the Los Angeles Superior Court's Bench-Bar Civil Committee. He is past Chair of the LACBA Complex Courts Bench-Bar Committee, and he served as Judge Pro Tem in the Los Angeles Small Claims Court in 1987-1988, 1990, 1992-1993, and 1996-1997. He was co-chair of the LACBA Court Funding Committee (2014-2026); and the Sponsorship Committee (2021-23). He was on the California State Bar Task Force on Complex Litigation, and Chair of the Judicial Education Subcommittee (1997). He was one of *Lawdragon's* 3000 Leading Plaintiffs' Lawyers In America (2007- 2010). Ranked in Chambers 2018-2019.

California Insurance Commissioner Dave Jones appointed Mr. Westerman to the California Organized Investment Network Advisory Board, 2012 term, which promotes insurance company investment in California communities.

Mr. Westerman is admitted to practice law in the State of California, the United States District Courts in California, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court.

Education:

B.A., Northwestern University, 1977

Elected to two senior honor societies

J.D., University of Pittsburgh, 1980, Law Review

Admitted:

California, 1980;

All California Federal Courts;

US Supreme Court