

# **EXHIBIT 6**

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In Re: PARKING HEATERS ANTITRUST LITIGATION	Case No. 15-MC-940 (DLI) (JO)
THIS DOCUMENT RELATES TO:  <i>All Direct Purchaser Class Actions</i>	

**DECLARATION OF C. ANDREW DIRKSEN  
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, C. Andrew Dirksen, declare as follows:

1. I am a partner with Cera LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, on behalf of the direct purchaser class in *In re Parking Heaters Antitrust Litigation* (the "Action").

2. For the period starting from the inception of the Action through and including September 30, 2018, the total number of hours spent by my firm working on the Action was 139.80, with a corresponding lodestar of \$99,667.50 based on current hourly rates. In connection with representing plaintiff TrailerCraft, Inc. ("client") and the Plaintiffs in the Action my firm did the following:

- Researching the market (including conducting interviews of market participants), drafting the initial complaint, and conferring with the client about details of the draft complaint and interviewing the client about the market;

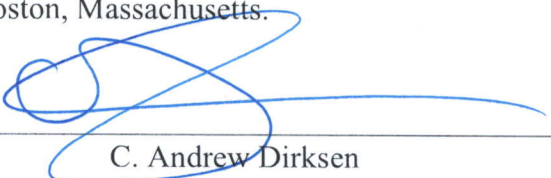
- Responding to questionnaires from co-lead counsel concerning the client's business;
- Keeping the client apprised of the case status and strategy, including settlement discussions, as informed by co-lead counsel;
- collecting, organizing and analyzing the client's business records that were potentially relevant or responsive to defendants' document requests, and working with co-lead counsel to obtain information; and
- Responding to co-lead counsel's requests for information from the client and conferring with the client about those requests in order to prepare Initial Disclosures and responses and objections to defendants' interrogatories and requests for production of documents.

The lodestar amount was performed by attorneys and professional staff at my firm for the benefit of the direct purchaser class. The hourly rates for the attorneys and professional staff in my firm are the usual and customary hourly rates charged by my firm in similar matters.

3. My firm has incurred a total of \$11,516.37 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception through and including September 30, 2018. These costs are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 9th day of October, 2018, in Boston, Massachusetts.

  
C. Andrew Dirksen

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In Re: PARKING HEATERS ANTITRUST LITIGATION	Case No. 15-MC-940 (DLI) (JO)
THIS DOCUMENT RELATES TO:  <i>All Direct Purchaser Class Actions</i>	

**EXHIBIT A TO THE DECLARATION OF C. ANDREW DIRKSEN  
IN SUPPORT OF PLAINTIFFS’ MOTION FOR AN  
AWARD OF ATTORNEYS’ FEES AND LITIGATION EXPENSES**

**Reported Hours and Lodestar**  
Inception Through September 30, 2018

Name	Role	Year	Hours	Rate	Lodestar
Solomon B. Cera	P	2015	54.90	\$900.00	\$49,410.00
Solomon B. Cera	P	2016-2018	3.80	\$1,000.00	\$3,800.00
C. Andrew Dirksen	P	2015	23.60	\$700.00	\$16,520.00
C. Andrew Dirksen	P	2016-2018	13.80	\$725.00	\$10,005.00
Louis A. Kessler	A	2015	40.70	\$475.00	\$19,332.50
John R. Leibee	PL	2015-2018	3.00	\$200.00	\$ 600.00
<b>Totals:</b>			<b>139.80</b>		<b>\$99,667.50</b>

- P Partner
- OC Of Counsel
- A Associate
- LC Law Clerk
- PL Paralegal
- I Investigator
- CA Contract Attorney

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In Re: PARKING HEATERS ANTITRUST LITIGATION	Case No. 15-MC-940 (DLI) (JO)
THIS DOCUMENT RELATES TO:  <i>All Direct Purchaser Class Actions</i>	

**EXHIBIT B TO THE DECLARATION OF C. ANDREW DIRKSEN  
IN SUPPORT OF PLAINTIFFS’ MOTION FOR AN  
AWARD OF ATTORNEYS’ FEES AND LITIGATION EXPENSES**

**Reported Expenses on Behalf of Direct Purchaser Plaintiffs  
Inception Through September 30, 2018**

<b>Category</b>	<b>Amount</b>
Internal Reproduction/Copies	\$408.00
Computer Research	\$245.78
Court Fees (filing, etc.)	\$465.00
Telephone/Fax	\$182.03
Postage/Express Delivery/Messenger	\$2.57
Professional Fees (expert, investigator, accountant, etc.)	\$8,750.00
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$1,462.99
<b>Total</b>	<b>\$11,516.37</b>