

EXHIBIT 1

**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 SETH R. GASSMAN
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Seth R. Gassman, declare as follows:

1. I am Of Counsel with Hausfeld 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 **1,743.40**, with a corresponding lodestar of **\$1,346,590.00** based on current hourly rates. In connection with representing the Plaintiffs in the Action, my firm did the following:

- Investigated the alleged conduct and drafted the first complaint filed with respect to anticompetitive conduct for Parking Heaters;
- Engaged in several meet-and-confer sessions to reach a consensus on a proposed Document Preservation Stipulation and Order, ESI Protocol, and Scheduling Order.

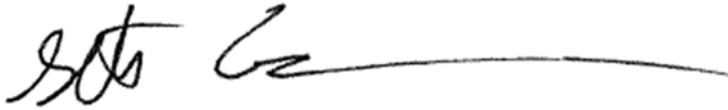
- Managed discovery, including extensive meet and confer process with defendants concerning appropriate scope of discoverable material;
- Drafted motion to compel related to Espar's prior contacts with class members, including oral argument concerning same;
- Participated in extensive discussion with defense counsel, including proffers;
- Ensured that document discovery was complete for both plaintiffs and defendants, and reviewed document production for information related to the alleged conspiracy;
- Consulted with an economic expert to estimate damages incurred by class members, and successfully presented the evidence and damages estimates to defendants and mediators, which resulted in both settlement agreements;
- Consulted with an economic expert in anticipation of class certification;
- Drafted settlement agreements, prepared papers related to approval of the settlement agreements, worked with claims administrator to devise and implement notice program, and attended preliminary approval hearing regarding the settlement agreements.

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 **\$67,506.42** 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 30th day of October, 2018, in San Francisco, California

A handwritten signature in black ink, consisting of stylized initials 'SRG' followed by a long horizontal flourish.

Seth R. Gassman

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**EXHIBIT A TO THE DECLARATION OF SETH R. GASSMAN
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

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

Name	Role	Year	Hours	Rate	Lodestar
Armstrong, Robert	SA		14.10	370.00	5,217.00
Bailey, Jr., Arthur N.	P		9.60	790.00	7,584.00
Bojedla, Swathi	A		1.50	500.00	750.00
Coolidge, Melinda R.	P		18.50	650.00	12,025.00
Gambhir, Reena A.	P		1.50	710.00	1,065.00
Gassman, Seth	OC		878.30	730.00	641,159.00
Hausfeld, Michael D.	P		27.60	1,375.00	37,950.00
Jones, Megan E.	P		2.50	790.00	1,975.00
Kenney, Jeannine	P		277.50	630.00	174,825.00
Landau, Brent W.	P		1.40	800.00	1,120.00
Lebsock, Christopher L.	P		6.50	850.00	5,525.00
Lehmann, Michael P.	P		27.00	1,100.00	29,700.00
Martin, Scott	P		5.30	1,100.00	5,830.00
Pizzirusso, Jamie J.	P		2.20	770.00	1,694.00
Ratner, Brian A.	P		20.10	830.00	16,683.00
Robinson, Elliot	PL		45.00	270.00	12,150.00
Scher, Irv	SC		1.80	1,100.00	1,980.00
Schumacher, Michael	OC		8.50	600.00	5,100.00

Name	Role	Year	Hours	Rate	Lodestar
Semones, Lesley	PL		44.50	280.00	12,460.00
Sittler, Edward	PL		13.10	280.00	3,668.00
Sukhoo, Stephanie	PL		3.00	280.00	840.00
Sweeney, Bonny	P		333.90	1,100.00	367,290.00
Totals:			1,743.40		\$1,346,590.00

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

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**EXHIBIT B TO THE DECLARATION OF SETH R. GASSMAN
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**Reported Expenses on Behalf of Direct Purchaser Plaintiffs
Through September 30, 2018**

Category	Amount
Commercial Copies	63.44
Internal Reproduction/Copies	431.19
Computer Research	1,578.18
Court Fees (filing, etc.)	1,960.00
Court Reporters/Transcripts	344.80
Telephone/Fax	1,301.53
Postage/Express Delivery/Messenger	697.62
Professional Fees (expert, investigator, accountant, etc.)	36,390.00
Witness/Service Fees	
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	24,739.66
Miscellaneous	
Total	\$67,506.42