

1 WHATLEY KALLAS LLP  
Alan M. Mansfield (Cal. Bar No. 125998)  
2 amansfield@whatleykallas.com  
1 Sansome Street, 35th Fl., PMB # 131  
3 San Francisco, CA 94104  
4 Tel: (415) 860-2503  
5 Fax: (888) 331-9633

6 BURSOR & FISHER, P.A.  
L. Timothy Fisher (Cal. Bar No. 191626)  
7 ltfisher@bursor.com  
Neal J. Deckant (admitted *pro hac vice* in Cal.)  
8 ndeckant@bursor.com  
1990 North California Boulevard, Suite 940  
9 Walnut Creek, CA 94596  
10 Tel: (925) 300-4455  
Fax: (925) 407-2700

11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14  
15 **IN RE NVIDIA GTX 970 GRAPHICS CHIP**  
16 **LITIGATION**

**Case No. 4:15-cv-00760-PJH**

**DECLARATION OF**  
**DENNIS GEORGE PANTAZIS, JR.**  
**IN SUPPORT OF FEE APPLICATION**

17  
18  
19  
20 **This document relates to: all actions**

Date: December 7, 2016  
Time: 9:00 a.m.  
Courtroom 3 – 3rd Floor

Judge Phyllis J. Hamilton

21  
22  
23 I, DENNIS GEORGE, declare as follows:

24 1. I am an attorney with the law offices of Wiggins, Childs, Pantazis, Fisher &  
25 Goldfarb, LLC. I am an attorney licensed to practice in Alabama state. I make this declaration in  
26 support of the fee application to be filed by plaintiffs' counsel in connection with the settlement of  
27 this litigation. I have personal knowledge of the facts set forth in this declaration and, if called as a  
28 witness, could and would competently testify thereto.

1           2.       My firm was responsible for originating the first filed case in this matter (on behalf  
2 of Andrew Ostrowski) and we were involved in drafting the original and amended complaints,  
3 performing initial and subsequent research for various motions, and providing data support for  
4 settlement negotiations. I was asked by lead counsel, Alan Mansfield, to assist with completing  
5 these assignments..

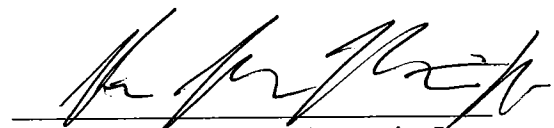
6           3.       The work that I performed for plaintiffs in this litigation included research, writing,  
7 drafting of pleadings, client outreach and management, and help with settlement discussions. I also  
8 attended one hearing in regard to appointment of interim class counsel.

9           4.       In connection with this effort, the total amount of time that I reasonably devoted to  
10 this litigation to date was 121.70 hours for professional services (excluding time spent in support of  
11 plaintiffs' fee application). Full-detail time records are available for the Court's inspection if  
12 requested.

13           5.       My professional billing rate is \$350.00 per hour, which is at or somewhat below  
14 typical billing rates in the Northern District of California for attorneys with my level of experience  
15 and expertise. I have been practicing law for approximately 6 years.

16           6.       Multiplying 121.70 hours by my professional billing rate of \$350.00/hour, the total  
17 lodestar for me is \$42,595.00. My firm also expended \$5,149.00 in expenses related to the  
18 prosecution of this case, and seeks reimbursement for same. These expenses were largely related  
19 to purchases of computer equipment to help identify the issues at stake in the case, as well as travel  
20 and research expenses for hearings and pleadings. Full-detail expense records are available for the  
21 Court's inspection if requested.

22           I declare under penalty of perjury that the foregoing is true and correct. Executed on  
23 October 24, 2016.

24   
25 \_\_\_\_\_  
26 Dennis George Pantazis, Jr.  
27  
28