

EXHIBIT 15

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

_____)
IN RE: AGGRENEX ANTITRUST)
LITIGATION)
)
)
THIS DOCUMENT RELATES TO:) C.A. No. 3:14-MD-2516(SRU)
)
ALL ACTIONS)
_____)

**DECLARATION OF GERALD C. PIA, JR. IN SUPPORT OF
CLASS COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES**

I, Gerald C. Pia, Jr., under penalty of perjury under the laws of the United States hereby declare and state as follows:

1. I am a partner of the law firm Roche Pia LLC. I am submitting this declaration in support of Class Counsel’s motion for attorneys’ fees and reimbursement of expenses in connection with services rendered by Roche Pia LLC in the above captioned litigation. The factual matters set forth and the assertions made herein are true and correct to the best of my knowledge, information and belief.
2. My firm acted first as local counsel for Hagens Berman Sobol Shapiro LLP (“Hagens”), on behalf of certain Direct Purchaser Class Plaintiffs and then as Co-Liaison Counsel for Direct Purchaser Class Plaintiffs in this litigation, per the appointment of this Court. During the course of this litigation, my firm has been involved in the following activities:
 - Reviewing, revising and filing of Complaints and other pleadings

and documents;

- Assistance with status reports;
- Assistance with filing under seal pursuant to local rules;
- Advising lead counsel regarding admissions practices and procedures and CM/ECF guidelines;
- Participating in status conferences, conferences, oral argument/hearings;
- Advising counsel regarding local rules, practices and procedures throughout litigation; and
- Communications with the Court's staff regarding scheduling and other administrative issues concerning this action

3. All attorneys and paralegals at my firm were instructed to keep contemporaneous time records reflecting their time spent on this case.
4. My firm's practice has substantial experience in federal civil litigation. A firm biography and the biography of each attorney currently with the firm who has worked on this case are attached as Exhibit A.
5. The schedule below is a summary of the amount of time spent by my firm's attorneys and paralegals from inception of the litigation through the date of this Declaration.
6. The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. Time expended in preparing this application for fees and reimbursement of expenses has not

been included in the below summary.

Name	Status	Total Hours	Current Hourly Rate	Total Lodestar
Brian Roche	P	18.70	\$340	\$6,358.00
Gerald Pia	P	141.90	\$340	\$48,246.00
Lisa Ryder	PL	23.60	\$100	\$2,360.00
TOTAL				\$56,964.00

7. My firm has also incurred a total of \$1,196.07 in out of pocket expenses in connection with the prosecution of the litigation. These expenses were reasonably and necessarily incurred in connection with this litigation and include the items specified in the table below. Our firm was reimbursed by Hagens for \$938.38 of these out of pocket expenses during the litigation. Therefore, the amount of unreimbursed expenses claimed by my firm is \$257.69.

Expense	Amount
Filing Fees	\$800.00
Service of Process Fees	\$110.00
Research	\$61.20
Travel/Hotel/Meals	\$45.00
Postage/Air Express/Messengers	\$179.87
TOTAL	\$1,196.07

Amount Reimbursed by Hagens	\$938.38
Amount Due Roche Pia LLC	\$257.69

8. The expenses incurred in this action are also reflected on the books and records of my firm. These books and records are prepared from expense vouchers, receipts and other source material and accurately record expenses incurred.

Dated: September 20, 2017.

/s/ Gerald C. Pia, Jr.
Gerald C. Pia, Jr.

EXHIBIT A

BIOGRAPHY OF BRIAN C. ROCHE

Brian C. Roche is one of the founding partners of Roche Pia LLC. His practice focuses on copyright, trademark, covenant not to compete and trade secret actions, as well as complex commercial litigation at both the state and federal level. He regularly counsels clients with respect to the best practices for protecting their intellectual property from piracy, counterfeiting and computer crimes threats. Brian also regularly counsels small business clients with respect to a variety of issues, including licensing, manufacturing and distributor agreements.

Prior to founding Roche Pia LLC, Brian was a partner in a large Connecticut law firm and the chair of that firm's Internet Piracy & Computer Crimes Section.

Brian also served as a law clerk for U.S. District Court Judge Alan H. Nevas.

Brian is admitted to practice in Connecticut and before the U.S. District Court for the District of Connecticut. He is a member of the Connecticut Bar Association and its Technology Law, Intellectual Property and Federal Practice Sections. He currently acts as Treasurer for the Raymond E. Baldwin American Inn of Court and serves on the Board of Isaiah 61:1 in Bridgeport, Connecticut. Brian is also a member of the Connecticut chapter of the High Technology and Crime Investigation Association ("HTCIA") and currently serves on the Board of that organization. In 2007, Brian was selected for membership in the prestigious Fellows of the American Bar Foundation. He has also received Martindale Hubbell's highest Peer Review Rating: AV® / Preeminent™.

Brian regularly speaks on issues related to Cyberlaw and Internet Piracy and has presented to such groups as the Connecticut Chapter of the HTCIA and the Association of Test Publishers ("ATP"), among other organizations.

Brian graduated, cum laude, from Fairfield University in 1992 with a B.A. in English literature and received his J.D. from Northeastern University School of Law in 1995.

BIOGRAPHY OF GERALD C. PIA, JR.

Gerald C. Pia, Jr. is one of the founding partners of Roche Pia LLC. Jerry focuses his Cyberlaw practice on intellectual property law, including copyright, trademark, and trade secret law, as well as on counterfeiting and piracy matters, computer crimes, covenants not to compete, and complex commercial litigation. He is a counselor and advocate for clients in the technology, entertainment and other commercial industries, and is experienced in the state and federal courts at the trial and appellate levels.

Prior to founding Roche Pia, Jerry was associated with a large Connecticut law firm, was a member of that firm's Intellectual Property Group and helped develop its Internet Piracy and Computer Crimes Section. Jerry also served for two years as a federal law clerk for the Honorable Holly B. Fitzsimmons, U.S.M.J., in the United States District Court for the District of Connecticut.

Jerry is admitted to State Bars of Connecticut and New York, as well the U.S. District Court for the District of Connecticut, Southern District of New York, Eastern District of New York and Second Circuit Court Appeals. He is a member of the Connecticut Bar Association and its Technology Law, Intellectual Property and Federal Practice Sections. Jerry is an officer of the Federal Bar Council's Connecticut Committee, and also an active member of the Fairfield County chapter of the American Inns of Court and the Connecticut chapter of the High Technology and Crime Investigation Association ("HTCIA").

Jerry has been involved in numerous community and nonprofit organizations, including as a board member for Activities for Kids Inc., and the Milford International Little League. In 2006, he received the Fairfield County Business Journal's "40 Under Forty" Award, recognizing him as one of Fairfield County's top "young leaders" who has succeeded in business and given back to the community. He has written various articles and given numerous presentations on a variety of Cyberlaw issues.

Jerry graduated, magna cum laude, from Sacred Heart University in 1995, with a B.S. in Business Management and Administration. He received his J.D. from New York University School of Law in 1999, graduating magna cum laude and as a member of the prestigious Order of the Coif. He has received Martindale Hubbell's highest Peer Review Rating: AV® / Preeminent™.