

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE SULFURIC ACID ANTITRUST LITIGATION	: MDL Docket No. 1536 : Case No. 03 C 4576 : : :
This Document Relates To:	: Honorable Judge David H. Coar : Magistrate Judge Jeffrey Cole : : :
ALL RELATED ACTIONS	: : :

**AFFIDAVIT OF JOSEPH M. BARTON IN SUPPORT OF PLAINTIFFS'
MOTION FOR REIMBURSEMENT OF EXPERTS' COSTS AND EXPENSES**

I, Joseph M. Barton, hereby declare as follows:

1. I am an attorney at the law firm of Gold Bennett Cera & Sidener LLP, one of Class Plaintiffs' Co-Lead Counsel. I submit this affidavit in support of plaintiffs' motion for reimbursement of experts' costs and expenses incurred in connection with this litigation.
2. Attached hereto as Exhibit A is a true and correct copy of the Notice of Class Action Settlement With Defendant E. I. Du Pont de Nemours and Company.
3. Plaintiffs' counsel have advanced all their litigation costs since the inception of this case. The most significant cost to date has been for experts to opine on class certification, liability, impact and damages. As detailed in the invoices submitted herewith, Plaintiffs' counsel has incurred expert costs and expenses totaling \$1,594,441.06.
4. To date, Plaintiffs' counsel has incurred approximately \$2.9 million in total costs since the inception of the litigation based on monthly reports submitted in this litigation.
5. As of September 5, 2006, the balance in the Settlement Fund is \$5,029,042.

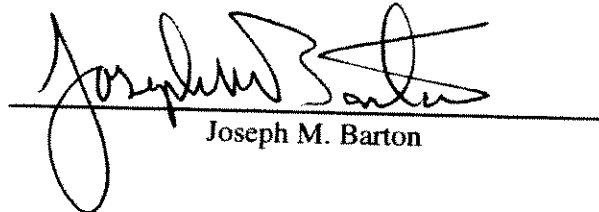
6. Attached hereto as Exhibit B are true and correct copies of invoices submitted to Plaintiffs' counsel for payment by Dr. James T. McClave totaling \$1,363,740.09 and his curriculum vita.

7. Attached hereto as Exhibit C are true and correct copies of invoices submitted to Plaintiffs' counsel for payment by Dr. Robert Tollison totaling \$152,800.35 and his curriculum vita.

8. Attached hereto as Exhibit D are true and correct copies of invoices submitted to Plaintiffs' counsel for payment by Dr. Martin Asher totaling \$77,900.62 and his curriculum vita.

9. Attached hereto as Exhibit E is a true and correct copy of *In re Electrical Carbon Products Antitrust Litig.*, --- F. Supp. 2d ---, 2006 WL 2505881 (D.N.J. August 30, 2006).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 5th day of September 2006 at San Francisco, California.



Joseph M. Barton