

**DECLARATION OF
J. COLBY WILLIAMS**

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Lead Counsel for Lead Plaintiff
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSE CHUNG LUO, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SPECTRUM PHARMACEUTICALS, INC., et
al.,

Defendants.

No. 2:21-cv-01612-CDS-BNW

CLASS ACTION

**DECLARATION OF J. COLBY
WILLIAMS FILED ON BEHALF OF
CAMPBELL & WILLIAMS IN SUPPORT
OF APPLICATION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES**

1 I, J. Colby Williams, declare as follows:

2 1. I am a partner in the firm of Campbell & Williams (“C&W” or the “Firm”). I am
3 submitting this declaration in support of the application for an award of attorneys’ fees and
4 expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

5 2. This Firm is Local Counsel of record for Lead Plaintiff International Trading
6 Group, Inc.

7
8 3. The information in this declaration regarding the Firm’s time and expenses is taken
9 from time and expense reports and supporting documentation prepared and/or maintained by the
10 Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-
11 day activities in the litigation, and I reviewed the subject reports (and, where necessary, backup
12 documentation) in connection with the preparation of this declaration. The purpose of this review
13 was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of,
14 the time and expenses committed to the litigation. As a result of this review, reductions were made
15 to the time I expended in the exercise of billing judgment. Based on this review and the
16 adjustments made, I believe that the time reflected in the Firm’s lodestar calculation and the
17 expenses for which payment is sought herein are reasonable and were necessary for the effective
18 and efficient prosecution and resolution of the litigation.

19
20 4. After the reductions referred to above, the number of hours spent on the litigation
21 by my Firm is 40.7. A breakdown of the lodestar is provided in Exhibit A. I was the only attorney-
22 timekeeper on this matter together with two paralegal-timekeepers. The lodestar amount for
23 attorney/paralegal time based on the Firm’s current rates is \$36,922.50. The hourly rates shown
24 in Exhibit A are consistent with hourly rates submitted by me and the Firm in other commercial
25 litigation matters, including securities class action litigation. The Firm’s rates are set based on
26 periodic analysis of rates charged by firms performing comparable work both on the plaintiff and
27
28

1 defense side. Different timekeepers within the same employment category (*e.g.*, partners,
2 associates, paralegals, etc.) may have different rates based on a variety of factors, including years
3 of practice, years at the Firm, years in the current position (*e.g.*, years as a partner), relevant
4 experience, relative expertise, and the rates of similarly experienced peers at this Firm or other
5 firms.
6

7 5. My Firm seeks an award of \$1,500 in expenses and charges in connection with the
8 prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit
9 B.

10 6. The following is additional information regarding certain of these expenses:

11 (a) Filing Fees: \$1,500. These expenses have been paid to the United States
12 District Court for the District of Nevada for five *pro hac vice* applications for my co-counsel.
13

14 7. The expenses pertaining to this case are reflected in the books and records of this
15 Firm. These books and records are prepared from receipts, expense vouchers, check records, and
16 other documents and are an accurate record of the expenses.

17 8. The identification and background of my Firm and its partners is attached hereto as
18 Exhibit C.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed this 11th day of September, 2025, at Las Vegas, Nevada.

21
22 /s/ J. Colby Williams
J. COLBY WILLIAMS

EXHIBIT A

EXHIBIT A

Jose Chung Luo v. Spectrum Pharmaceuticals, Inc., et al., Case No. 2:21-cv-01612-CDS-BNW
 Campbell & Williams
 Inception through August 31, 2025

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
J. Colby Williams	(P)	39.7	925	\$36,722.50
Paralegals		1.0	200	\$200
<i>TOTAL</i>		40.7		\$36,922.50

(P) Partner

EXHIBIT B

EXHIBIT B

Jose Chung Luo v. Spectrum Pharmaceuticals, Inc., et al., Case No. 2:21-cv-01612-CDS-BNW
Campbell & Williams
Inception through August 31, 2025

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing Fees	\$1,500.00
<i>TOTAL</i>	<i>\$1,500.00</i>

EXHIBIT C

EXHIBIT C

FIRM RESUME

Campbell & Williams is a boutique litigation law firm. Founded in 1986 as Donald J. Campbell & Associates, the firm's founder, Donald J. Campbell, set out to build a practice where hard work and deep personal relationships would serve as the keys to its success. In 1998, the firm was renamed Campbell & Williams after J. Colby Williams joined the firm as a partner. Now, over a quarter-century later, that lofty goal has been realized. With a client list and track record of achievement as notable as any of the largest firms in the country, Campbell & Williams has the experience and expertise required to navigate its clients through the most complex legal terrain.

As for national recognition, *U.S. News and World Report* has named Campbell & Williams one of the country's "Best Law Firms" in the fields of Commercial Litigation, First Amendment Litigation, White Collar Litigation, and White-Collar Governmental Investigations. In addition, *Chambers USA* has awarded the firm a "Band 1" designation, which is the highest rating it assigns, in the practice area of General Commercial Litigation. The firm has earned an AV "Preeminent" ranking for over twenty-five years, which is the highest rating for legal skill and ethical practices designated by *Martindale-Hubbell*. In addition, the firm's senior partners have been named to *Woodward & White's Best Lawyers in America* for over twenty years, and in 2008, *Super Lawyers* selected Mr. Campbell as its Mountain State's profile Lawyer of the Year. Messrs. Campbell and Williams are both Fellows of the American College of Trial Lawyers, a distinction reserved for the top 1% of trial lawyers in the United States and Canada.

Included among the firm's clients are gaming moguls, network news organizations, entertainers, sports franchise owners, professional athletes and leading political figures. But perhaps the firm's greatest compliment has been the frequency with which legal professionals, including judges and lawyers, have selected Campbell & Williams to represent them in matters of great personal concern.

PROFESSIONAL BIOGRAPHY OF J. COLBY WILLIAMS

Mr. Williams is a co-founder and senior partner of Campbell & Williams. Over his thirty-plus year career, he has handled numerous precedent setting cases representing plaintiffs and defendants in the fields of complex commercial litigation, high stakes administrative proceedings, catastrophic personal injury, and First Amendment Law. In 2015 and 2018, Mr. Williams was named “Lawyer of the Year” by Best Lawyers for “Bet-The-Company Litigation,” and earned the same distinction for “First Amendment” law in 2019. Mr. Williams has also held an AV “Preeminent” ranking for two decades, which is the highest rating for legal skill and ethical practices designated by Martindale-Hubbell. He has likewise been included in Chambers USA (Band 1), Commercial Litigation, Mountain States Super Lawyers, and is a long-standing member of the Multi-Million Dollar Advocates Forum. In March 2025, Mr. Williams was inducted into the prestigious American College of Trial Lawyers, an honor reserved for the top 1% of trial attorneys in the country.

Representative matters from Mr. Williams’ appellate practice include:

- *Hunt v. Zuffa, LLC*, 2025 WL 1164219 (9th Cir. Apr. 22, 2025) (affirming summary judgment in favor of mixed martial arts promotion and its president on former fighter’s remaining claims for fraud, aiding and abetting, and conspiracy)
- *American Broadcasting Companies, Inc. v. Miller*, 550 F.3d 786 (9th Cir. 2008) (reversing district court’s denial of attorney fees to six media corporations that prevailed in § 1983 action)
- *Lombardo v. Nev. Comm’n on Ethics*, 2025 WL 1711537 (Nev. June 18, 2025) (en banc) (unanimously reversing district court’s improper dismissal of public official’s petition for judicial review of disciplinary opinion)
- *Nevada Gaming Comm’n v. Wynn*, 138 Nev. 164, 507 P.3d 183 (2022) (en banc) (resolving as issue of first impression whether district courts have jurisdiction to entertain gaming commission disciplinary decisions through writs of prohibition)
- *Canarelli v. Eighth Judicial Dist. Ct.*, 138 Nev. 104, 506 P.3d 334 (2022) (en banc) (answering question of first impression regarding standard governing disqualification of district court judges based on information learned performing judicial duties)
- *Canarelli v. Eighth Judicial Dist. Ct.*, 136 Nev. 247, 464 P.3d 114 (2020) (en banc) (holding as a matter of first impression that Nevada does not recognize the fiduciary exception to the attorney-client privilege)
- *Gardner on Behalf of L.G. v. Eighth Jud. Dist. Ct.*, 133 Nev. 730, 405 P.3d 651 (2017) (finding that limited liability company members can be sued individually for personally participating in tortious acts and that alter ego doctrine applies to limited liability companies)

Mr. Williams' recent work at the trial court and administrative agency level includes:

- Represented former casino executive in high profile federal court action and obtained dismissal of all claims brought by disgruntled patron claiming various intentional torts
- Obtained second summary judgment order and attorney fee award on behalf of mixed martial arts promotion and its president on former fighter's remaining claims after first appeal
- After day-long live-streamed hearing, obtained dismissal on one set of alleged ethics violations against public official and \$20,000 fine on other set of charges where agency originally sought more than \$1.6 million; Mr. Williams continues to challenge on appeal the violation and fine
- After multi-week arbitration in the Bay Area, obtained favorable monetary judgment and attorney fee award for affiliate of publicly traded Las Vegas casino operator and complete defense of Native American Tribe's multi-million dollar counterclaim
- Defeated election contest challenging results of 2022 Republican Primary Election for Nevada Governor
- Obtained preliminary injunction against Massachusetts Gaming Commission and its agents precluding use of materials protected by common interest privilege in gaming investigation
- Part of trial team that secured eight-figure settlement against water park on behalf of catastrophically injured minor

Mr. Williams is a member of the State Bar of Nevada, the Clark County Bar Association, the Media Law Resource Center, and formerly served as a member of the Nevada Rules of Appellate Procedure Commission and the Board of Trustees for the Nevada Museum of Art. He was recently appointed by Justices of the Nevada Supreme Court to serve as a member on the Committee to Study the Adjudication of Business Law Cases in Nevada.