

THE HONORABLE BARBARA J. ROTHSTEIN

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COOPER MOORE and ANDREW
GILLETTE, on their own behalf and on
behalf of all others similarly situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC, a
Delaware limited liability company,

Defendant.

Case No. 2:21-cv-01571-BJR

**DECLARATION OF E. MICHELLE
DRAKE IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES,
LITIGATION COSTS, AND
SERVICE AWARDS**

1 I, E. Michelle Drake, declare as follows:

2 1. I am one of Class Counsel in this action.

3 2. The matters set forth herein are within my personal knowledge and, if sworn as a
4 witness, I could competently testify regarding them.

5 3. I submit this Declaration in support of Plaintiff's Motion for Attorneys' Fees,
6 Litigation Costs, and Service Awards.

7 **A. Class Counsel Overview**

8 4. Berger Montague PC specializes in class action litigation and is one of the
9 preeminent class action law firms in the United States. (*See generally* Exhibit 1.) The firm
10 currently consists of over 90 attorneys who primarily represent plaintiffs in complex civil
11 litigation, and class action litigation, in federal and state courts. (*Id.* at 1.) Berger Montague has
12 played lead roles in major class action cases for over 50 years and has obtained settlements and
13 recoveries totaling well into the billions for its clients and the classes they have represented. (*Id.*
14 at 1-2.)

15 5. I am an Executive Shareholder at Berger Montague. I have been practicing law
16 since 2001 and am a graduate of Harvard College, Oxford University, and Harvard Law School.
17 In 2016, I joined Berger Montague as a Shareholder, prior to that I was a partner at Nichols Kaster,
18 PLLP, where I ran that firm's consumer protection group.

19 6. I serve as co-chair of the firm's Consumer Protection & Mass Tort Department, and
20 as chair of the Background Checks and Credit Reporting Department. My practice focuses on
21 protecting consumers' rights when they are injured by improper credit reporting, and other illegal
22 business practices. I currently serve as lead or co-lead counsel in dozens of class action consumer
23 protection cases in federal and state courts across the country.

24 7. I serve on the Board of the Southern Center for Human Rights, the Board of Public
25 Justice, am a member of the Partner's Council of the National Consumer Law Center, am a former
26 Co-Chair of the Consumer Litigation Section for the Minnesota State Bar Association, and a
27 former Board Member of the National Association of Consumer Advocates. I have previously

1 served as a member of the Ethics Committee for the National Association of Consumer Advocates,
2 and as Treasurer and At-Large Council Member for the Consumer Litigation Section of the
3 Minnesota State Bar Association. I was also an appointee to the Federal Practice Committee in
4 2010 by the U.S. District Court for the District of Minnesota.

5 8. I was named to the LawDragon 500 Leading Plaintiff Financial Lawyers List for
6 2019, and a 2020 Elite Woman of the Plaintiffs Bar by the National Law Journal. I am consistently
7 named to the annual lists of The Best Lawyers of America, Top 50 Women Minnesota Super
8 Lawyers, and Super Lawyers. I have been quoted in the New York Times, and the National Law
9 Journal, and have had prior cases named as “Lawsuits of the Year” by Minnesota Law & Politics.

10 **i. My Speaking Engagements**

11 9. I present frequently at national and local conferences on class actions and consumer
12 protection-related topics, and I co-authored a book chapter on background checks and related
13 issues, “Financial and Criminal Background Checks,” Job Applicant Screening: A Practice Guide,
14 Minnesota Continuing Legal Education Publication, May 2014, and the forthcoming 2d. ed. I was
15 a contributing author to “Consumer Law,” The Complete Lawyer’s Quick Answer Book,
16 Minnesota Continuing Legal Education Publication, 2d. ed., 2019, and “Chapter 1: Case and
17 Claims Selection, Other First Considerations,” Consumer Class Actions, National Consumer Law
18 Center, 10th ed., 2019. My recent speaking engagements have included:

19 “National FCRA Landscape,” National Association of Consumer Advocates Spring
20 Training, May 2022.

21 “Sealing, Expungement and FCRA: Criminal Records Reporting in a New Era,” Equal
22 Justice Conference, May 2022.

23 “Evidentiary Challenges in Certifying Class Actions,” Class Action Symposium,
24 Consumer Rights Litigation Conference, National Consumer Law Center, December 2021.

25 “COVID and Post-COVID Issues in FCRA Litigation,” National Association of Consumer
26 Advocates Spring Training, Virtual, April 2021.

27 “Consumer Law: Overview of the Fair Credit Reporting Act,” Minnesota Continuing Legal
Education, Virtual, December 2020.

1 “The Role of the Lawyer in Class Actions,” Panel Chair, Global Class Actions Symposium
2020, Virtual, November 2020.

2 “Hunting the Snark: Finding & Effectively Using Data to Certify Classes,” Class Action
3 Symposium, National Consumer Law Center Consumer Rights Litigation Conference,
4 Virtual, November 2020.

5 “Specialty CRAs Part 1: Conviction Histories, Expungement, and FCRA: Keeping up with
6 Developments in a Changing Legal Landscape,” National Consumer Law Center
Consumer Rights Litigation Conference, Virtual, November 2020.

7 “Conducting Financial & Criminal Background Checks – Applicant Rights and Employer
8 Best Practices,” Minnesota Continuing Legal Education, Minneapolis, MN, October 2020.

9 **ii. My Admissions**

10 10. I litigate cases throughout the United States and have been admitted to, and am a
11 member in good standing with, the following courts:

12 United States Supreme Court, 2017

13 State Bar of Georgia, 2001

14 Georgia Supreme Court, 2006

15 Minnesota Supreme Court, 2007

16 U.S. Court of Appeals for the Eighth Circuit, 2010

17 U.S. Court of Appeals for the First Circuit, 2011

18 U.S. Court of Appeals for the Seventh Circuit, 2014

19 U.S. Court of Appeals for the Ninth Circuit, 2015

20 U.S. Court of Appeals for the Tenth Circuit, 2018

21 U.S. Court of Appeals for the Third Circuit, 2019

22 U.S. District Court for the Northern District of Georgia, 2007

23 U.S. District Court for the District of Minnesota, 2007

24 U.S. District Court for the Eastern District of Wisconsin, 2011

25 U.S. District Court for the Western District of Texas, 2011

26 U.S. District Court for the Western District of Wisconsin, 2015

27 U.S. District Court for the Eastern District of Michigan, 2015

1 U.S. District Court for the Central District of Illinois, 2016

2 U.S. District Court for the Southern District of Texas, 2017

3 U.S. District Court for the Western District of New York, 2017

4 U.S. District Court for the Western District of Michigan, 2018

5 U.S. District Court for the Northern District of Illinois, 2020

6 **iii. My Prior Class Counsel Appointments, Settlements**

7 11. I currently serve, or have served, as lead or co-lead class counsel in numerous
8 notable consumer protection matters, including, but not limited to, the following:

9 *In re Moveit Customer Data Sec. Breach Litig.*, MDL 3083 (D. Mass. 2023). Appointed as
10 Co-Lead Counsel in massive data breach affecting over 60 million people and including
11 class actions filed against more than 100 defendants.

12 *Fernandez v. RentGrow, Inc.*, No. 1:19-CV-01190 (D. Md. 2022). FCRA class action,
13 alleging violations by consumer reporting agency regarding its OFAC reporting; appointed
14 as Class Counsel for certified class of approximately 71,000 consumers.

15 *In re GEICO Customer Data Breach Litig.*, No. 21-cv-2210 (E.D.N.Y.). Appointed as
16 Interim Co-Lead Counsel on behalf of putative class in data disclosure action.

17 *Gambles v. Sterling Infosystems, Inc.*, No. 15-cv-9746 (S.D.N.Y.) FCRA class action,
18 alleging violations by consumer reporting agency, resulting in a gross settlement of \$15
19 million, one of the largest FCRA settlements to date.

20 *In re: JUUL Labs, Inc. Mktg., Sales Practices, & Prod. Liab. Litig.*, No. 19-md-2913 (N.D.
21 Cal.). Appointed to Plaintiffs' Steering Committee in multi-district litigation consolidated
22 class action, regarding the marketing and sales practices of dangerous e-cigarettes to
23 consumers.

24 *In re: American Medical Collection Agency, Inc. Customer Data Security Breach Litig.*,
25 No. 19-md-2904 (D.N.J.). Appointed to the Plaintiff's Quest Track Steering Committee in
26 multi-district litigation consolidated class action, regarding the breach of consumers'
27 medical information.

In re: TransUnion Rental Screening Sols., Inc. FCRA Litig., No. 1:20-md-02933-JPB
(N.D. Ga.). Appointed as Interim Lead Counsel for the classes in multi-district litigation
consolidated class action, regarding violations of the Fair Credit Reporting Act; case
ultimately settled for over \$11 million dollars for the classes.

Thomas v. Equifax Info. Services, LLC, No. 18-cv-684 (E.D. Va.). FCRA class action,
alleging violations by credit bureau, providing nationwide resolution of class action claims

1 asserted across multiple jurisdictions, including injunctive relief, and an uncapped
2 mediation program for millions of consumers.

3 *Clark v. Experian Info. Sols., Inc.*, No. 16-cv-32 (E.D. Va.). FCRA class action, alleging
4 violations by credit bureau, resulting in nationwide resolution of class action claims
5 asserted by 32 plaintiffs in 16 jurisdictions, including injunctive relief and an uncapped
6 mediation program, for millions of consumers.

7 *Clark/Anderson v. Trans Union, LLC*, No. 15-cv-391 & No. 16-cv-558 (E.D. Va.). FCRA
8 consolidated class action, alleging violations by credit bureau, resulting in groundbreaking
9 injunctive relief, and an opportunity to recover monetary relief, for millions of consumers.

10 *Rilley v. MoneyMutual, LLC*, No. 16-cv-4001 (D. Minn.). Class action alleging that
11 defendant violated Minnesota payday lending regulations, resulting in a \$2 million
12 settlement with notable injunctive relief.

13 *Lee v. The Hertz Corp.*, No. CGC-15-547520 (Cal. Super. Ct., San Fran. Cnty.). FCRA
14 class action, alleging violations by employer, resulting in a \$1.619 million settlement.

15 *Rubio-Delgado v. Aerotek, Inc.*, No. 16-cv-1066 (S.D. Ohio). FCRA class action, alleging
16 violations by employer, resulting in a \$15 million settlement.

17 *Knights v. Publix Super Markets, Inc.*, No. 14-cv-720 (M.D. Tenn.). FCRA class action,
18 alleging violations by employer, resulting in a \$6.75 million settlement.

19 *Hillson v. Kelly Services, Inc.*, No. 15-cv-10803 (E.D. Mich.). FCRA class action, alleging
20 violations by employer, resulting in a \$6.749 million settlement.

21 *Ernst v. DISH Network, LLC & Sterling Infosystems, Inc.*, No. 12-cv-8794 (S.D.N.Y.).
22 FCRA class action, alleging multiple violations, resulting in a \$4.75 million settlement
23 with consumer reporting agency, and a \$1.75 million settlement with employer.

24 *Howell v. Checkr, Inc.*, No. 17-cv-4305 (N.D. Cal.). FCRA class action, alleging violations
25 by consumer reporting agency, resulting in a \$4.46 million settlement.

26 *Taylor v. Inflection Risk Sols., LLC*, No. 20-CV-2266 (D. Minn. Oct. 20, 2021). FCRA
27 class action, alleging violations by consumer reporting agency, resulting in a \$4 million
settlement.

Brown v. Delhaize America, LLC, No. 14-cv-195 (M.D.N.C.). FCRA class action, alleging
violations by employer, resulting in a \$2.99 million settlement.

Nesbitt v. Postmates, Inc., No. CGC-15-547146 (Cal. Super. Ct., San Fran. Cnty.). FCRA
class action, alleging violations by employer, resulting in a \$2.5 million settlement.

Singleton v. Domino's Pizza, LLC, No. 11-cv-1823 (D. Md.). FCRA class action, alleging
violations by employer, resulting in a \$2.5 million settlement.

1 *Heaton v. Social Finance, Inc.*, No. 14-cv-5191 (N.D. Cal.). FCRA class action, alleging
2 violations by lender, resulting in a \$2.5 million settlement.

3 *Terrell v. Costco Wholesale Corp.*, No. 10-2-33915-9 (Wash. Super. Ct., King Cnty.).
4 FCRA class action, alleging violations by employer, resulting in a \$2.49 million settlement.

5 *Halvorson v. TalentBin, Inc.*, No. 15-cv-5166 (N.D. Cal.). FCRA class action, alleging
6 violations by online data aggregator, resulting in a \$1.15 million settlement.

7 *Legrand v. IntelliCorp Records, Inc.*, No. 15-cv-2091 (N.D. Ohio). FCRA class action,
8 alleging violations by consumer reporting agency, resulting in a \$1.1 million settlement.

9 *In re Target Corp. Customer Data Security Breach Litig.*, MDL No. 14-2522 (D. Minn.).
10 Data security breach class action, resulting in a \$10 million settlement.

11 **iv. Judicial Praise for My Work**

12 12. My litigation efforts and experience have received judicial acknowledgement and
13 praise throughout the years of my practice. Examples of such recognition include:

14 From Judge Paul A. Engelmayer, United States District Court, Southern District of New
15 York:

16 I know the diligence of counsel and dedication of counsel to the class...Thank you, Ms.
17 Drake. As always I appreciate the—your extraordinary dedication to your – to the class
18 and the very obvious backwards and forwards familiarity you have with the case and level
19 of preparation and articulateness today. It’s a pleasure always to have you before
20 me...Class counsel [] generated this case on their own initiative and at their own risk.
21 Counsel’s enterprise and ingenuity merits significant compensation...Counsel here are
22 justifiably proud of the important result that they achieved.

23 Sept. 22, 2020, Final Approval Hearing, *Gambles v. Sterling Info., Inc.*, No. 15-cv-9746.

24 From Judge Harold E. Kahn, Dep’t 302, Superior Court of Cal., San Fran. Cnty.:

25 You’re very articulate on this issue. ... Obviously, you’re very thoughtful and you have
26 given it a great deal of thought. ... And I appreciate your ability to respond to my questions
27 off the cuff. ... It shows that you have given these issues a lot of thought ... I have to say
that your thoughtfulness this morning has somewhat diminished my concerns [regarding
high multiplier on attorney fees]... You’re demonstrating credibility by a mile as you
go....You are extraordinarily impressive. And I thank you for being here, and for your
candid, noninvasive [sic] response to every question I have. I was extremely skeptical at
the outset this morning. You have allayed all of my concerns and have persuaded me that
this is an important issue, and that you have done a great service to the class. And for that

1 reason, I am going to approve your settlement in all respects... And I congratulate you on
2 your excellent work.

3 Nov. 7, 2017, Final Approval Hearing, *Nesbitt v. Postmates, Inc.*, No. CGC-15-547146.

4 From Judge Laurie J. Michelson, United States District Court, E.D. Mich.:

5 Counsel's quality of work in this case was high. The Court has been impressed with
6 counsel's in-court arguments. And counsel has provided the Court with quality briefing as
7 well.

8 Aug. 11, 2017, Opinion & Order on Mtn. for Atty. Fees, and Mtn. for Final Approval,
9 *Hillson v. Kelly Services, Inc.*, No. 15-cv-10803.

10 From Magistrate Judge Terence P. Kemp, United States District Court, S.D. Ohio:

11 The parties in this case are represented by counsel with substantial experience in class
12 action litigation, and FCRA cases in particular. ... Class Counsel are experienced and
13 knowledgeable in FCRA litigation, are skilled, and are in good standing.

14 June 30, 2017, Report & Recomm'n. on Final Approval, *Rubio-Delgado v. Aerotek, Inc.*,
15 No. 16-cv-1066.

16 From Judge Paul A. Magnuson, United States District Court, D. Minn.:

17 [T]he class representatives and their counsel more than adequately protected the class's
18 interests. ... [T]he comprehensive nature of the settlement in turn, reflects the adequacy,
19 indeed the superiority, of the representation the class received from its named Plaintiffs
20 and from class counsel.

21 May 17, 2017, Mem. & Order on Mtn. to Certify Class, *In re Target Corp. Customer Data*
22 *Sec. Breach Litig.*, MDL No. 14-2522.

23 From Judge Paul A. Engelmayer, United States District Court, S.D.N.Y.:

24 The high quality of [plaintiffs' counsel]'s representation strongly supports approval of the
25 requested fees. The Court has previously commended counsel for their excellent
26 lawyering. ...The point is worth reiterating here. [Plaintiffs' counsel] was energetic,
27 effective, and creative throughout this long litigation. The Court found [Plaintiffs'
counsel]'s briefs and arguments first-rate. And the documents and deposition transcripts
which the Court reviewed in the course of resolving motions revealed the firm's far-sighted
and strategic approach to discovery. ... Further, unlike in many class actions, plaintiffs'
counsel did not build their case by piggybacking on regulatory investigation or settlement.
... The lawyers [] can genuinely claim to have been the authors of their clients' success.

Sept. 22, 2015, Final Approval Order, *Hart v. RCI Hospitality Holdings, Inc.*, No. 09-cv-
3043.

1 From Magistrate Judge Laurel Beeler, United States District Court, N.D. Cal.:

2 Counsel have worked vigorously to identify and investigate the claims in this case, and, as
3 this litigation has revealed, understand the applicable law and have represented their clients
4 vigorously and effectively.

5 June 13, 2014, Order Granting Mtn. for Class Cert., *Ellsworth v. U.S. Bank, N.A.*, No. 12-
6 cv-2506.

7 From Judge Richard H. Kyle, United States District Court, D. Minn.:

8 Well, I think you did a great job on this. I mean, I really do. ... it seems to me you folks
9 have gotten it done the right way.

10 Jan. 6, 2014, Prelim. Approval Hearing, *Bible v. General Revenue Corp.*, No. 12-cv-1236.

11 From Judge Deborah Chasanow, United States District Court, D. Md.:

12 [plaintiffs' counsel] are qualified, experienced, and competent, as evidenced by their
13 background in litigating class-action cases involving FCRA violations. ... As noted above,
14 Plaintiffs' attorneys are experienced and skilled consumer class action litigators who
15 achieved a favorable result for the Settlement Classes.

16 Oct. 2, 2013, Final Approval Order, *Singleton v. Domino's Pizza, LLC*, No. 11-cv1823.

17 From Judge Lorna G. Schofield, United States District Court, S.D.N.Y.:

18 [Plaintiffs' Counsel] has demonstrated it is able fairly and adequately to represent the
19 interests of the putative class.

20 July 23, 2013, Order Appointing Interim Lead Counsel, *Ernst v. DISH Network, LLC*, No.
21 12-cv-8794.

22 From Judge Susan M. Robiner, Minnesota District Court, Henn. Cnty.:

23 Plaintiffs' counsel are adequate legal representatives for the class. They have done work
24 identifying and investigating potential claims, have handled class actions in the past, know
25 the applicable law, and have the resources necessary to represent the class. The class will
26 be fairly and adequately represented.

27 Oct. 16, 2012, Order Granting Mtn. for Class Cert., *Spar v. Cedar Towing & Auction, Inc.*,
No. 27-CV-411-24993.

1 **v. Experience & Qualifications of Case Team**

2 13. In addition to myself, this matter was litigated by an impressive team of attorneys
3 and support staff. Class Counsel on this matter additionally includes:

4 14. Sophia M. Rios. Ms. Rios was the primary attorney from Berger Montague drafting
5 briefs and executing discovery in this matter. She was also the main point of contact for both
6 Plaintiffs. Ms. Rios manages Berger Montague’s San Diego office and practices in the Consumer
7 Protection and Credit Reporting and Background Checks practice groups. Ms. Rios advocates on
8 behalf of a broad range of clients. Ms. Rios regularly speaks on consumer law and class action
9 litigation issues. As a first-generation college student and woman of color, Ms. Rios is committed
10 to furthering diversity and inclusion in law firms and serves on Berger Montague’s Diversity,
11 Equity & Inclusion Task Force. She was named by Super Lawyers as a San Diego Rising Star in
12 2023 and 2024, Best Lawyers as One to Watch in from 2022-2024, and to San Diego’s Top 40
13 Under 40 Business Professionals in 2020. Ms. Rios graduated from Stanford Law School in 2015,
14 where she served as an extern Legal Adviser in the Office of Commissioner Julie Brill at the
15 Federal Trade Commission in Washington, DC, co-founded the Stanford Critical Law Society, and
16 was a Lead Article Editor for the Stanford Environmental Law Journal. Ms. Rios has a B.A. and a
17 B.S. from UC Berkeley.

18 15. Zachary M. Vaughan. Mr. Vaughn assisted with third party discovery, mediation,
19 and expert discovery in this matter. Mr. Vaughan is a Senior Counsel in Berger Montague’s
20 Consumer Protection group, where he focuses his practice on consumer class actions concerning
21 financial and credit-reporting practices. Before joining the Firm, Mr. Vaughan was a litigation
22 associate at a large national law firm and an international plaintiffs’ firm. Mr. Vaughan is a
23 graduate of Dartmouth College and Georgetown Law. During law school, Mr. Vaughan served as
24 an editor of the Georgetown Law Journal and a Student Counsel in the Georgetown Appellate
25 Litigation Clinic. Following law school, Mr. Vaughan served as a law clerk to Judge D. Michael
26 Fisher of the U.S. Court of Appeals for the Third Circuit in Pittsburgh and to Judge Colleen
27 McMahon of the U.S. District Court for the Southern District of New York.

1 16. Support staff timekeepers in this case include:

2 Jean Hibray. Jean Hibray is a Paralegal and the Office Manager for the Minneapolis
3 office. Ms. Hibray has worked for Berger Montague since 2016 and has been a paralegal for
4 Executive Shareholder E. Michelle Drake since 2010. She is responsible for the day-to-day
5 operations of the Minneapolis office, as well as a paralegal caseload with a focus on Fair
6 Credit Reporting Act and Consumer Protection cases, across multiple jurisdictions. Ms.
7 Hibray has an ABA-approved Paralegal Certificate from the Minnesota Paralegal Institute
8 (2010), as well as a B.A. in Political Science-Legal Studies from the University of Wisconsin-
9 Eau Claire (2009).

10 Julie Gionnette. Ms. Gionnette was the primary Legal Assistant on this matter, assisting
11 with docketing and calendaring work, and supporting the case team.

12 **B. Class Counsel's Work on this Matter**

13 17. Class Counsel have worked without compensation or reimbursement for their time
14 and out-of-pocket expenses incurred in litigating this action. Before taking the case, Class
15 Counsel negotiated a customary contingency fee agreement with Plaintiffs, with the
16 understanding that this would be an appropriate incentive for Class Counsel to take on the
17 financial risks involved. Class Counsel also agreed to advance all costs. If Class Counsel did not
18 successfully resolve this matter, they would have been paid nothing. Due to the investment that
19 litigating this case required, Class Counsel had to forego other representations.

20 **C. Class Counsel's Resources Expended**

21 **i. Class Counsel's Costs**

22 18. To date, Berger Montague PC has incurred \$110,339.97 in out-of-pocket costs, for
23 which no reimbursement has been received. including expert fees, professional fees, filing and
24 service fees, mediation fees, postage, and transcript costs. These costs were necessary to the
25 successful resolution of this matter.

26 19. Class Counsel incurred substantial professional fees necessary for the legal
27 representation of third parties that had been subpoenaed by Robinhood, including the operator of

1 classaction.org, an agent of Berger Montague that connected Class Counsel with Plaintiffs and
 2 other potential class members, and the individuals that sent Plaintiffs the text messages at issue
 3 in this case. These costs were expended to benefit Plaintiffs and the Class, as Robinhood sought
 4 to discover privileged class member communications with one subpoena and sought documents
 5 and testimony from Plaintiffs' friends and family members with the other.

6 20. Berger Montague has controls and processes in place to control costs including:
 7 requiring multiple approvals for large expert costs, requiring coach or economy class airfare
 8 bookings, and not reimbursing for items like alcohol, for which a paying client would not
 9 normally be charged.

10 21. A table summarizing the categories of those costs is below, and a true and correct
 11 detailed report is attached hereto as **Exhibit 2**. All costs submitted have been reviewed by Class
 12 Counsel.

Item	Amount
Printing/Scanning	\$5.30
Filing Fees	\$1,656.51
Postage/Delivery	\$28.66
DocuSign	\$32.24
JAMS Mediation Fees	\$11,075.00
Expert Fees	\$23,064.57
Professional Fees	\$59,105.92
Westlaw Charges	\$1,188.59
Service Fees	\$215.37
Transcripts	\$4,750.95
E-Discovery Hosting:	\$7,184.88
Meals	\$248.46
Hotels	\$1,105.19
Travel	\$678.33
TOTAL:	\$110,339.97

1 **ii. Class Counsel’s Fees**

2 22. As of April 5, 2024, Berger Montague PC had expended 1,132 hours in the
3 litigation and settlement of this matter.

4 23. In an attempt to litigate this case efficiently, Class Counsel assigned work—
5 including oral arguments and depositions—to junior attorneys whenever possible. For example,
6 Ms. Rios, an associate with Berger Montague, spearheaded Class Counsel’s discovery efforts,
7 deposed Robinhood’s corporate representatives, and argued a discovery motion. All told,
8 associates, counsel, and staff accounted for over 89% of Berger Montague’s time in this matter.

9 24. Berger Montague’s time records are maintained in accordance with industry
10 standards to ensure reliability and transparency. The firm’s formal policy requires all
11 timekeepers—including attorneys and support staff—to keep records of time worked
12 contemporaneously and to provide sufficient detail to convey the nature and merit of the work
13 performed. To ensure each time entry contains sufficient detail, Berger Montague requires time
14 entries to include both matter numbers (corresponding to the specific case) and task codes
15 (corresponding to the type of work performed). BMPC uses the widely-accepted ABA Litigation
16 Code Set, which includes 29 task codes spread across 5 stages of litigation (e.g., Pre-Trial
17 Pleadings and Motions, Discovery, etc.) to allocate time to particular tasks. This model, endorsed
18 by courts,¹ ensures that time is billed in a uniform and task-oriented manner.² Timekeepers are
19 also required to provide narrative descriptions setting forth the case-specific tasks associated with
20 each time entry.

21 25. This manner of time-keeping, with contemporaneous records and detailed
22 descriptions broken down by task, provides a level of accountability that courts nationwide
23

24 ¹ See *Yahoo!, Inc. v. Net Games, Inc.*, 329 F. Supp. 2d 1179, 1189 (N.D. Cal. 2004) (“The ABA
25 template commends itself to parties applying for fee awards.”); *Albion Pac. Prop. Res., LLC v.*
Seligman, 329 F. Supp. 2d 1163, 1174 (N.D. Cal. 2004) (same).

26 ² American Bar Association, Uniform Task-Based Management System, available at
27 [https://www.americanbar.org/groups/litigation/resources/uniform_task_based_management_syst
em/](https://www.americanbar.org/groups/litigation/resources/uniform_task_based_management_system/) (“The Litigation Code Set has formed the basis for most, if not all, schemes to record and bill
time on an hourly basis.”).

1 routinely recommend when scrutinizing applications for attorneys' fees. *Deary v. City of*
2 *Gloucester*, 9 F.3d 191, 197-98 (1st Cir. 1993) ("In order to recover fees, attorneys must submit
3 a full and precise accounting of their time, including specific information about number of hours,
4 dates, and the nature of the work performed."); *Bode v. United States*, 919 F.2d 1044, 1047 (5th
5 Cir. 1990) (collecting cases) ("[C]ourts customarily require the applicant to produce
6 contemporaneous billing records or other sufficient documentation so that the district court can
7 fulfill its duty to examine the application.").

8 26. Berger Montague's hourly rates are regularly accepted by courts throughout the
9 country for purposes of class action fee awards. *See, e.g., In re Domestic Drywall Antitrust Litig.*,
10 No. 13-md-2437, 2018 WL 3439454, *20 (E.D. Pa. July 17, 2018) (holding that the hourly rates
11 claimed by Berger, among other firms, were "well within the range of rates charged by counsel
12 in this district in complex cases"); *Devlin v. Ferrandino & Son, Inc.*, No. 15-4976, 2016 WL
13 7178338, *10 (E.D. Pa. Dec. 9, 2016) ("[T]he hourly rates for Class Counsel [including Berger
14 Montague] are well within the range of what is reasonable and appropriate in this market"); *see*
15 *also Howell v. Checkr, Inc.*, No. 3:17-cv-04305-SK, ECF No. 82 (N.D. Cal. Dec. 13, 2018) (final
16 approval order approving Berger Montague's fee request, which was supported by lodestar cross-
17 check using Berger Montague's standard hourly rates); *Douglas v. DHI Group, Inc.*, No. 2018-1-
18 CV-331732, Order (Santa Clara Cnty., Cal. Super. Ct. Aug. 6, 2019) (same); *Lee v. The Hertz*
19 *Corp.*, No. CGC-15-547520, Order (San Fran. Cnty., Cal Super. Ct. Aug. 30, 2019) (order
20 approving fees and costs, specifically finding lodestar cross-check to support reasonableness of
21 fee award, including hours and rates of Berger Montague); *Terrell v. Costco Wholesale Corp.*,
22 No. 16-2-19140-1, Order (King Cnty., Wash. Super. Ct. June 19, 2018) (order approving fees and
23 costs and stating that Berger Montague's hourly rates "are reasonable given the experience and
24 skill of counsel").

25 27. Class Counsel has reviewed the time records in this case to ensure compliance with
26 Berger Montague's timekeeping policies and that time was not billed for attorneys who only had
27 minimal contributions to the case, i.e., less than 10 hours billed.

a. Current Hourly Rates, Lodestar, & Lodestar Multiplier

28. Using Class Counsel's current hourly rates, Berger Montague's lodestar as of April 5, 2024 is \$828,255. A table of these current fees is below, and a true and correct copy of the underlying entries are attached hereto as **Exhibit 3**.

Summary Table of Amounts & Hours Billed by Timekeeper

Name, Position	Hours	Rate	Amount Billed
E. Michelle Drake Executive Shareholder	115.2	\$1,180	\$135,936
Sophia Rios Associate	691.1	\$710	\$490,681
Zachary Vaughan Senior Counsel	204.7	\$740	\$151,478
Jean Hibray Paralegal	95	\$450	\$42,750
Julie Gionnette Legal Assistant	26	\$285	\$7,410

D. Plaintiffs' Contributions to this Litigation

29. From the outset of this litigation, Plaintiffs Cooper Moore and Andrew Gillette have served as an exemplary Class Representatives.

30. Among other things, Plaintiffs: (1) contacted Class Counsel about their potential claims; (2) assisted Class Counsel in the investigation of their claims and to preserve evidence by having their mobile phones imaged; (3) reviewed and approved the complaint and amended complaint for filing; (4) responded to 34 requests for production, 16 interrogatories, and 15 requests for admission, and provided supplemental responses where necessary; (5) produced thousands of pages of documents, including personal emails and text messages; (6) prepared for and appeared at full-day, in-person depositions; (7) regularly conferred with Class Counsel; (8) made themselves available to Class Counsel throughout settlement negotiations; and (9) reviewed and approved the Settlement Agreement.

31. Plaintiffs both rejected individual settlement offers so that they could pursue a result that benefited all Class members and not just themselves—and did so despite Robinhood's threats that doing so could subject them to substantial personal liability.

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32. Without Plaintiffs’ efforts and dedication throughout this litigation, the outstanding result in this matter would not have been possible.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Executed on this 12th day of April, 2024 at Minneapolis, Minnesota.

/s/ E. Michelle Drake
E. Michelle Drake

EXHIBIT 1



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About Berger Montague

Berger Montague is a full-spectrum class action and complex civil litigation firm, with nationally known attorneys highly sought after for their legal skills. The firm has been recognized by courts throughout the country for its ability and experience in handling major complex litigation, particularly in the fields of antitrust, securities, mass torts, civil and human rights, whistleblower cases, employment, and consumer litigation. In numerous precedent-setting cases, the firm has played a principal or lead role.

The *National Law Journal* selected Berger Montague in 12 out of 14 years (2003-2005, 2007-2013, 2015-2016) for its "Hot List" of top plaintiffs-oriented litigation firms in the United States. The select group of law firms recognized each year had done "exemplary, cutting-edge work on the plaintiffs' side." The *National Law Journal* ended its "Hot List" award in 2017 and replaced it with "Elite Trial Lawyers," which Berger Montague has won from 2018-2021. The firm has also achieved the highest possible rating by its peers and opponents as reported in *Martindale-Hubbell* and was ranked as a 2021 "Best Law Firm" by *U.S. News - Best Lawyers*.

Currently, the firm consists of over 90 lawyers; 19 paralegals; and an experienced support staff. Few firms in the United States have our breadth of practice and match our successful track record in such a broad array of complex litigation.

History of the Firm

Berger Montague was founded in 1970 by the late David Berger to concentrate on the representation of plaintiffs in a series of antitrust class actions. David Berger helped pioneer the use of class actions in antitrust litigation and was instrumental in extending the use of the class action procedure to other litigation areas, including securities, employment discrimination, civil and human rights, and mass torts. The firm's complement of nationally recognized lawyers has represented both plaintiffs and defendants in these and other areas and has recovered billions of dollars for its clients. In complex litigation, particularly in areas of class action litigation, Berger Montague has established new law and forged the path for recovery.

The firm has been involved in a series of notable cases, some of them among the most important in the last 50 years of civil litigation. For example, the firm was one of the principal counsel for plaintiffs in the *Drexel Burnham Lambert/Michael Milken* securities and bankruptcy litigation. Claimants in these cases recovered approximately \$2 billion in the aftermath of the collapse of

the junk bond market and the bankruptcy of *Drexel* in the late 1980's. The firm was also among the principal trial counsel in the *Exxon Valdez Oil Spill* litigation in Anchorage, Alaska, a trial resulting in a record jury award of \$5 billion against Exxon, later reduced by the U.S. Supreme Court to \$507.5 million. Berger Montague was lead counsel in the *School Asbestos Litigation*, in which a national class of secondary and elementary schools recovered in excess of \$200 million to defray the costs of asbestos abatement. The case was the first mass tort property damage class action certified on a national basis. Berger Montague was also lead class counsel and lead trial counsel in the *Cook v. Rockwell International Corporation* litigation arising out of a serious incident at the Rocky Flats nuclear weapons facility in Colorado.

Additionally, in the human rights area, the firm, through its membership on the executive committee in the *Holocaust Victim Assets Litigation*, helped to achieve a \$1.25 billion settlement with the largest Swiss banks on behalf of victims of Nazi aggression whose deposits were not returned after the Second World War. The firm also played an instrumental role in bringing about a \$4.37 billion settlement with German industry and government for the use of slave and forced labor during the Holocaust.

Commitment to *Pro Bono*

Berger Montague attorneys commit their most valuable resource, their time, to charities, nonprofit organizations, and *pro bono* legal work. For over 50 years, Berger Montague has encouraged its attorneys to support charitable causes and volunteer in the community. Our lawyers understand that participating in *pro bono* representation is an essential component of their professional and ethical responsibilities.

Berger Montague is strongly committed to numerous charitable causes. Over his lengthy career, David Berger, the firm's founding partner, was prominent in a great many philanthropic and charitable enterprises, including serving as Honorary Chairman of the American Heart Association; a Trustee of the American Cancer Society; and a member of the Board of Directors of the American Red Cross. This tradition continues to the present.

Community Legal Services of Philadelphia, an organization that provides free legal advice and representation to low-income residents of Philadelphia, honored Berger Montague with its 2021 Champion of Justice Award for the firm's work leading a case against the IRS that succeeded in getting unemployed people their rightful benefits during the COVID-19 pandemic.

In prior years, Berger Montague received the Chancellor's Award presented by the Philadelphia Volunteers for the Indigent Program ("VIP"), which provides crucial legal services to more than 1,000 low-income Philadelphia residents each year. VIP relies on volunteer attorneys to provide *pro bono* representation for families and individuals. In 2009 and 2010, Berger Montague also received an award for our volunteer work with the VIP Mortgage Foreclosure Program.

Today, Berger Montague attorneys engage in *pro bono* work for many organizations, including:

- Public Interest Law Center of Philadelphia ("PILCOP")

- Community Legal Services of Philadelphia (“CLS”)
- Philadelphia Legal Assistance
- Education Law Center
- Legal Clinic for the Disabled
- Support Center for Child Advocates
- Veterans Pro Bono Consortium
- AIDS Law Project of Philadelphia
- Center for Literacy
- National Liberty Museum
- Philadelphia Volunteers for the Indigent Program
- Philadelphia Mortgage Foreclosure Program

We are proud of our written *pro bono* policy that encourages and strongly supports our attorneys to get involved in this important and rewarding work. Many attorneys at Berger Montague have been named to the First District of Pennsylvania’s Pro Bono Honor Roll.

Berger Montague also makes annual contributions to the Philadelphia Bar Foundation, an umbrella charitable organization dedicated to promoting access to justice for all people in the community, particularly those struggling with poverty, abuse, and discrimination.

The firm also has held numerous clothing drives, toy drives, food drives, and blood drives. Through these efforts, Berger Montague professional and support staff have donated thousands of items of clothing, toys, and food to local charities including the Salvation Army, Toys for Tots, and Philabundance, a local food bank. Blood donations are made to the American Red Cross. Berger Montague attorneys also volunteer on an annual basis at MANNA, which prepares and delivers nourishing meals to those suffering with serious illnesses.

Practice Areas and Case Profiles

Antitrust

In antitrust litigation, the firm has served as lead, co-lead or co-trial counsel on many of the most significant civil antitrust cases over the last 50 years, including *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (settlement of approximately \$5.6 billion), *In re Namenda Direct Purchaser Antitrust Litigation* (recovery of \$750 million), *In re Loestrin 24 Fe Antitrust Litigation* (recovery of \$120 million), and *In re Domestic Drywall Antitrust Litigation* (settlements totaling \$190.7 million).

Once again, Berger Montague has been selected by *Chambers and Partners* for its 2021 *Chambers USA* Guide as one of Pennsylvania’s top antitrust firms. *Chambers USA 2021* states that Berger Montague’s antitrust practice group is “a preeminent force in the Pennsylvania antitrust market, offering expert counsel to clients from a broad range of industries.”

The Legal 500, a guide to worldwide legal services providers, ranked Berger Montague as a Top Tier Law Firm for Antitrust: Civil Litigation/Class Actions: Plaintiff in the United States in its 2021

guide and states that Berger Montague's antitrust department "has a flair for handling high-stakes plaintiff-side cases, regularly winning high-value settlements for clients following antitrust law violations."

- ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation:*** Berger Montague served as co-lead counsel for a national class including millions of merchants in the *Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* against Visa, MasterCard, and several of the largest banks in the U.S. (e.g., Chase, Bank of America, and Citi). The lawsuit alleged that merchants paid excessive fees to accept Visa and MasterCard cards because the payment cards, individually and together with their respective member banks, violated the antitrust laws. The challenged conduct included, *inter alia*, the collective fixing of interchange fees and adoption of rules that hindered any competitive pressure by merchants to reduce those fees. The lawsuit further alleged that defendants maintained their conspiracy even after both Visa and MasterCard changed their corporate forms from joint ventures owned by member banks to publicly-owned corporations following commencement of this litigation. On September 18, 2018, after thirteen years of hard-fought litigation, Visa and MasterCard agreed to pay as much as approximately \$6.26 billion, but no less than approximately \$5.56 billion, to settle the case. This result is the largest-ever class action settlement of an antitrust case. The settlement received preliminary approval on January 24, 2019. The settlement received final approval on December 16, 2019, for approximately \$5.6 billion.
- ***Contant, et al. v. Bank of America Corp., et al.:*** Berger Montague served as lead class counsel in the multistate indirect purchaser antitrust class action *Contant, et al. v. Bank of America Corp., et al.*, against 16 of the world's largest dealer banks. Plaintiffs alleged that the defendants colluded to manipulate prices on foreign currency ("FX") instruments, using a number of methods to carry out their conspiracies, including sharing confidential price and order information through electronic chat rooms, thereby enabling the defendants to coordinate pricing and eliminate price competition. As with prior bank rigging scandals involving conspiracies to manipulate prices on other financial instruments, the defendants' alleged conspiracy to manipulate FX prices was the subject of numerous governmental investigations as well as direct purchaser class actions brought under antitrust federal law. However, the *Contant* action was the first of such cases to bring claims under state indirect purchaser antitrust laws on behalf of state-wide classes of retail investors of those financial instruments and whose claims have never been redressed. On July 29, 2019, U.S. District Judge Lorna G. Schofield granted preliminary approval of a \$10 million settlement with Citigroup and a \$985,000 settlement with MUFG Bank Ltd. On July 17, 2020, the Court granted preliminary approval of three settlements with all remaining defendants for a combined \$12.695 million. Each of the five settlements, totaling \$23.63 million, received final approval on November 19, 2020.
- ***In re Dental Supplies Antitrust Litigation:*** Berger Montague served as co-lead counsel for a class of dental practices and dental laboratories in *In re Dental Supplies Antitrust Litigation*, a suit brought against Henry Schein, Inc., Patterson Companies, Inc., and

Benco Dental Supply Company, the three largest distributors of dental supplies in the United States. On September 7, 2018, co-lead counsel announced that they agreed with defendants to settle on a classwide basis for \$80 million. The settlement received final approval on June 24, 2019. The suit alleged that the defendants, who collectively control close to 90 percent of the dental supplies and equipment distribution market, conspired to restrain trade and fix prices at anticompetitive levels, in violation of the Sherman Act. In furtherance of the alleged conspiracy, plaintiffs claimed that the defendants colluded to boycott and pressure dental manufacturers, dental distributors, and state dental associations that did business with or considered doing business with the defendants' lower-priced rivals. The suit claimed that, because of the defendants' anticompetitive conduct, members of the class were overcharged on dental supplies and equipment. In the 2019 Fairness Hearing, Judge Brian M. Cogan of the U.S. District Court for the Eastern District of New York said: "This is a substantial recovery that has the deterrent effect that class actions are supposed to have, and I think it was done because we had really good Plaintiffs' lawyers in this case who were running it."

- ***In re Domestic Drywall Antitrust Litigation:*** Berger Montague served as co-lead counsel on behalf of a class of direct purchasers of drywall, in a case alleging that the dominant manufacturers of drywall engaged in a conspiracy to fix drywall prices in the U.S. and to abolish the industry's long-standing practice of limiting price increases for the duration of a construction project through "job quotes." Berger Montague represented a class of direct purchasers of drywall from defendants for the period from January 1, 2012 to January 31, 2013. USG Corporation and United States Gypsum Company (collectively, "USG"), New NGC, Inc., Lafarge North America Inc., Eagle Materials, Inc., American Gypsum Company LLC, TIN Inc. d/b/a Temple-Inland Inc., and PABCO Building Products, LLC were named as defendants in this action. On August 20, 2015, the district court granted final approval of two settlements—one with USG and the other with TIN Inc.—totaling \$44.5 million. On December 8, 2016, the district court granted final approval of a \$21.2 million settlement with Lafarge North America, Inc. On February 18, 2016, the district court denied the motions for summary judgment filed by American Gypsum Company, New NGC, Inc., Lafarge North America, Inc., and PABCO Building Products. On August 23, 2017, the district court granted direct purchaser plaintiffs' motion for class certification. On January 29, 2018, the district court granted preliminary approval of a joint settlement with the remaining defendants, New NGC, Inc., Eagle Materials, Inc., American Gypsum Company LLC, and PABCO Building Products, LLC, for \$125 million. The settlement received final approval on July 17, 2018, bringing the total amount of settlements for the class to \$190.7 million.
- ***In re Currency Conversion Fee Antitrust Litigation:*** Berger Montague, as one of two co-lead counsel, spearheaded a class action lawsuit alleging that the major credit cards had conspired to fix prices for foreign currency conversion fees imposed on credit card transactions. After eight years of litigation, a settlement of \$336 million was approved in October 2009, with a Final Judgment entered in November 2009. Following the resolution of eleven appeals, the District Court, on October 5, 2011, directed distribution of the

settlement funds to more than 10 million timely filed claimants, among the largest class of claimants in an antitrust consumer class action. A subsequent settlement with American Express increased the settlement amount to \$386 million. (MDL No. 1409 (S.D.N.Y)).

- ***In re Marchbanks Truck Service Inc., et al. v. Comdata Network, Inc.***: Berger Montague was co-lead counsel in this antitrust class action brought on behalf of a class of thousands of Independent Truck Stops. The lawsuit alleged that defendant Comdata Network, Inc. had monopolized the market for specialized Fleet Cards used by long-haul truckers. Comdata imposed anticompetitive provisions in its agreements with Independent Truck Stops that artificially inflated the fees Independents paid when accepting the Comdata's Fleet Card for payment. These contractual provisions, commonly referred to as anti-steering provisions or merchant restraints, barred Independents from taking various competitive steps that could have been used to steer fleets to rival payment cards. The settlement for \$130 million and valuable prospective relief was preliminary approved on March 17, 2014, and finally approved on July 14, 2014. In its July 14, 2014 order approving Class Counsel's fee request, entered contemporaneously with its order finally approving the settlement, the Court described this outcome as "substantial, both in absolute terms, and when assessed in light of the risks of establishing liability and damages in this case."
- ***Ross, et al. v. Bank of America (USA) N.A., et al.***: Berger Montague, as lead counsel for the cardholder classes, obtained final approval of settlements reached with Chase, Bank of America, Capital One and HSBC, on claims that the defendant banks unlawfully acted in concert to require cardholders to arbitrate disputes, including debt collections, and to preclude cardholders from participating in any class actions. The case was brought for injunctive relief only. The settlements remove arbitration clauses nationwide for 3.5 years from the so-called "cardholder agreements" for over 100 million credit card holders. This victory for consumers and small businesses came after nearly five years of hard-fought litigation, including obtaining a decision by the Court of Appeals reversing the order dismissing the case, and will aid consumers and small businesses in their ability to resist unfair and abusive credit card practices. In June 2009, the National Arbitration Forum (or "NAF") was added as a defendant. Berger Montague also reached a settlement with NAF. Under that agreement, NAF ceased administering arbitration proceedings involving business cards for a period of three and one-half (3.5) years, which relief is in addition to the requirements of a Consent Judgment with the State of Minnesota, entered into by the NAF on July 24, 2009.
- ***Johnson, et al. v. AzHHA, et al.***: Berger Montague was co-lead counsel in this litigation on behalf of a class of temporary nursing personnel, against the Arizona Hospital and Healthcare Association, and its member hospitals, for agreeing and conspiring to fix the rates and wages for temporary nursing personnel, causing class members to be underpaid. The court approved \$24 million in settlements on behalf of this class of nurses. (Case No. 07-1292 (D. Ariz.)).

The firm has also played a leading role in cases in the pharmaceutical arena, especially in cases involving the delayed entry of generic competition, having achieved over \$2 billion in settlements in such cases over the past decade, including:

- ***In re: Namenda Direct Purchaser Antitrust Litigation:*** Berger Montague is co-lead counsel for the class in this antitrust action brought on behalf of a class of direct purchasers of branded and/or generic Namenda IR and/or branded Namenda XR. It settled for \$750 million on the very eve of trial. The \$750 million settlement received final approval on May 27, 2020, and is the largest single-defendant settlement ever for a case alleging delayed generic competition. (Case No. 15-cv-7488 (S.D.N.Y.)).
- ***King Drug Co. v. Cephalon, Inc.:*** Berger Montague played a major role (serving on the executive committee) in this antitrust class action on behalf of direct purchasers of the prescription drug Provigil (modafinil). After nine years of hard-fought litigation, the court approved a \$512 million partial settlement, then the largest settlement ever for a case alleging delayed generic competition. (Case No. 2:06-cv-01797 (E.D. Pa.)). Subsequent non-class settlements pushed the total settlement figure even higher.
- ***In re Aggrenox Antitrust Litigation:*** Berger Montague represented a class of direct purchasers of Aggrenox in an action alleging that defendants delayed the availability of less expensive generic Aggrenox through, *inter alia*, unlawful reverse payment agreements. The case settled for \$146 million. (Case No. 14-02516 (D. Conn.)).
- ***In re Asacol Antitrust Litigation:*** The firm served as class counsel for direct purchasers of Asacol HS and Delzicol in a case alleging that defendants participated in a scheme to block generic competition for the ulcerative colitis drug Asacol. The case settled for \$15 million. (Case No. 15-cv-12730-DJC (D. Mass.)).
- ***In re Celebrex (Celecoxib) Antitrust Litigation:*** The firm represented a class of direct purchasers of brand and generic Celebrex (celecoxib) in an action alleging that Pfizer, in violation of the Sherman Act, improperly obtained a patent for Celebrex from the U.S. Patent and Trademark Office in a scheme to unlawfully extend patent protection and delay market entry of generic versions of Celebrex. The case settled for \$94 million. (Case No. 14-cv-00361 (E.D. VA.)).
- ***In re DDAVP Direct Purchaser Antitrust Litigation:*** Berger Montague served as co-lead counsel in a case that charged defendants with using sham litigation and a fraudulently obtained patent to delay the entry of generic versions of the prescription drug DDAVP. Berger Montague achieved a \$20.25 million settlement only after winning a precedent-setting victory before the United States Court of Appeals for the Second Circuit that ruled that direct purchasers had standing to recover overcharges arising from a patent-holder's misuse of an allegedly fraudulently obtained patent. (Case No. 05-2237 (S.D.N.Y.)).
- ***In re K-Dur Antitrust Litigation:*** Berger Montague served as co-lead counsel for the class in this long-running antitrust litigation. Berger Montague litigated the case before the

Court of Appeals and won a precedent-setting victory and continued the fight before the Supreme Court. On remand, the case settled for \$60.2 million. (Case No. 01-1652 (D.N.J.)).

- ***In re Loestrin 24 Fe Antitrust Litigation:*** Berger Montague served as co-lead counsel for the class of direct purchasers of brand Loestrin, generic Loestrin, and/or brand Minastrin. The direct purchaser class alleged that defendants violated federal antitrust laws by unlawfully impairing the introduction of generic versions of the prescription drug Loestrin 24 Fe. The case settled shortly before trial for \$120 million (Case No. 13-md-2472) (D.R.I.).
- ***Meijer, Inc., et al. v. Abbott Laboratories:*** Berger Montague served as co-lead counsel in a class action on behalf of pharmaceutical wholesalers and pharmacies charging Abbott Laboratories with illegally maintaining monopoly power and overcharging purchasers in violation of the federal antitrust laws. Plaintiffs alleged that Abbott had used its monopoly with respect to its anti-HIV medicine Norvir (ritonavir) to protect its monopoly power for another highly profitable Abbott HIV drug, Kaletra. This antitrust class action settled for \$52 million after four days of a jury trial in federal court in Oakland, California. (Case No. 07-5985 (N.D. Cal.)).
- ***Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.:*** Berger Montague served as co-lead counsel in a case challenging Warner Chilcott's alleged anticompetitive practices with respect to the branded drug Doryx. The case settled for \$15 million. (Case No. 2:12-cv-03824 (E.D. Pa.)).
- ***In re Oxycontin Antitrust Litigation:*** Berger Montague served as co-lead counsel on behalf of direct purchasers of the prescription drug Oxycontin. The case settled in 2011 for \$16 million. (Case No. 1:04-md-01603 (S.D.N.Y.)).
- ***In re Prandin Direct Purchaser Antitrust Litigation:*** Berger Montague served as co-lead counsel and recovered \$19 million on behalf of direct purchasers of the diabetes medication Prandin. (Case No. 2:10-cv-12141 (E.D. Mich.)).
- ***Rochester Drug Co-Operative, Inc. v. Braintree Labs., Inc.:*** Berger Montague served as co-lead counsel on behalf of direct purchasers alleging sham litigation led to the delay of generic forms of the brand drug Miralax. The case settled for \$17.25 million. (Case No. 07-142 (D. Del.)).
- ***In re Skelaxin Antitrust Litigation:*** Berger Montague was among a small group of firms litigating on behalf of direct purchasers of the drug Skelaxin. The case settled for \$73 million. (Case No. 2:12-cv-83 / 1:12-md-02343) (E.D. Tenn.)).
- ***In re Solodyn Antitrust Litigation:*** Berger Montague served as co-lead counsel representing a class of direct purchasers of brand and generic Solodyn (extended-release

minocycline hydrochloride tablets) alleging that defendants entered into agreements not to compete in the market for extended-release minocycline hydrochloride tablets in violation of the Sherman Act. With a final settlement on the eve of trial, the case settled for a total of more than \$76 million. (Case No. 14-MD-2503-DJC (D. Mass.)).

- ***In re Tricor Antitrust Litigation:*** Berger Montague was one of a small group of counsel in a case alleging that the manufacturer of this drug was paying its competitors to refrain from introducing less expensive generic versions of Tricor. The case settled for \$250 million. (No. 05-340 (D. Del.)).
- ***In re Wellbutrin XL Antitrust Litigation:*** Berger Montague served as co-lead counsel for a class of direct purchasers of the antidepressant Wellbutrin XL. A settlement of \$37.5 million was reached with Valeant Pharmaceuticals (formerly Biovail), one of two defendants in the case. (Case No. 08-cv-2431 (E.D. Pa.)).

Commercial Litigation

Berger Montague helps business clients achieve extraordinary successes in a wide variety of complex commercial litigation matters. Our attorneys appear regularly on behalf of clients in high stakes federal and state court commercial litigation across the United States. We work with our clients to develop a comprehensive and detailed litigation plan, and then organize, allocate and deploy whatever resources are necessary to successfully prosecute or defend the case.

- ***Robert S. Spencer, et al. v. The Arden Group, Inc., et al.:*** Berger Montague represented an owner of limited partnership interests in several commercial real estate partnerships in a lawsuit against the partnerships' general partner. The terms of the settlement are subject to a confidentiality agreement. (Aug. Term, 2007, No. 02066 (Pa. Ct. Com. Pl., Phila. Cty. - Commerce Program)).
- ***Forbes v. GMH:*** Berger Montague represented a private real estate developer/investor who sold a valuable apartment complex to GMH for cash and publicly-held securities. The case which claimed securities fraud in connection with the transaction settled for a confidential sum which represented a significant portion of the losses experienced. (No. 07-cv-00979 (E.D. Pa.)).

Commodities & Financial Instruments

Berger Montague ranks among the country's preeminent firms for managing and trying complex Commodities & Financial Instruments related cases on behalf of individuals and as class actions. The firm's commodities clients include individual hedge and speculation traders, hedge funds, energy firms, investment funds, and precious metals clients.

- ***In re Peregrine Financial Group Customer Litigation:*** Berger Montague served as co-lead counsel in a class action which helped deliver settlements worth more than \$75 million on behalf of former customers of Peregrine Financial Group, Inc., in litigation against U.S. Bank, N.A., and JPMorgan Chase Bank, N.A., arising from Peregrine's

collapse in July 2012. The lawsuit alleges that both banks breached legal duties by allowing Peregrine's owner to withdraw and put millions of dollars in customer funds to non-customer use. (No. 1:12-cv-5546)

- ***In re MF Global Holdings Ltd. Investment Litigation:*** Berger Montague is one of two co-lead counsel that represented thousands of commodities account holders who fell victim to the alleged massive theft and misappropriation of client funds at the former major global commodities brokerage firm MF Global. Berger Montague reached a variety of settlements, including with JPMorgan Chase Bank, the MF Global SIPA Trustee, and the CME Group, that collectively helped to return approximately \$1.6 billion to the class. Ultimately, class members received more than 100% of the funds allegedly misappropriated by MF Global even after all fees and expenses. (No. 11-cv-07866 (S.D.N.Y.)).
- ***In re Commodity Exchange, Inc., Gold Futures and Options Trading Litigation:*** Berger Montague is one of two co-lead counsel representing traders of gold-based derivative contracts, physical gold, and gold-based securities against The Bank of Nova Scotia, Barclays Bank plc, Deutsche Bank AG, HSBC Bank plc, Société Générale and the London Gold Market Fixing Limited. Plaintiffs allege that the defendants, members of the London Gold Market Fixing Limited, which sets an important benchmark price for gold, conspired to manipulate this benchmark for their collective benefit. (1:14-md-02548 (S.D.N.Y.)).
- ***In re Libor-Based Financial Instruments Antitrust Litigation:*** Berger Montague represents exchange-based investors in this sprawling litigation alleging a conspiracy among many of the world's largest banks to manipulate the key LIBOR benchmark rate. LIBOR plays an important role in valuing trillions of dollars of financial instruments worldwide. The case, filed in 2011, alleges that the banks colluded to misreport and manipulate LIBOR rates for their own benefit. The banks' conduct damaged, among others, exchange-based investors who transacted in Eurodollar futures and options on the CME between 2005 and 2010. Eurodollar futures and options are keyed to LIBOR and are the world's most heavily traded short-term interest rate contracts. Following years of hotly contested litigation on behalf of these exchange-based investors, Berger Montague and its co-counsel achieved settlements with seven banks totaling more than \$180 million. In September 2019, the Court granted preliminary approval of a plan of distribution for these settlement funds. A final approval hearing on the settlement is scheduled in September 2020. (No. 1:11-md-02262-NRB (S.D.N.Y.)).

Consumer Protection

Berger Montague's Consumer Protection Group protects consumers when they are injured by false or misleading advertising, defective products, data privacy breaches, and various other unfair trade practices. Consumers too often suffer the brunt of corporate wrongdoing, particularly in the area of false or misleading advertising, defective products, and data or privacy breaches.

- ***In re: CertainTeed Fiber Cement Siding Litigation:*** The firm, as one of two Co-Lead Counsel firms obtained a settlement of more than \$103 million in this multidistrict products liability litigation concerning CertainTeed Corporation's fiber cement siding, on behalf of a nationwide class. (MDL No. 2270 (E.D. Pa.)).
- ***Countrywide Predatory Lending Enforcement Action:*** Berger Montague advised the Ohio Attorney General (and several other state attorneys general) regarding predatory lending in a landmark law enforcement proceeding against *Countrywide* (and its parent, Bank of America) culminating in 2008 in mortgage-related modifications and other relief for borrowers across the country valued at some \$8.6 billion.
- ***In re Experian Data Breach Litigation:*** Berger Montague served on the Executive Committee of this class action lawsuit that arose from a 2015 data breach at Experian in which computer hackers stole personal information including Social Security numbers and other sensitive personal information for approximately 15 million consumers. The settlement is valued at over \$170 million. It consisted of \$22 million for a non-reversionary cash Settlement Fund; \$11.7 million for Experian's remedial measures implemented in connection with the lawsuit; and two years of free credit monitoring and identity theft insurance. The aggregate value of credit monitoring claimed by class members during the claims submission process exceeded \$138 million, based on a \$19.99 per month retail value of the service.
- ***In re Pet Foods Product Liability Litigation:*** The firm served as one of plaintiffs' co-lead counsel in this multidistrict class action suit seeking to redress the harm resulting from the manufacture and sale of contaminated dog and cat food. The case settled for \$24 million. Many terms of the settlement are unique and highly beneficial to the class, including allowing class members to recover up to 100% of their economic damages without any limitation on the types of economic damages they may recover. (1:07-cv-02867 (D.N.J.), MDL Docket No. 1850 (D.N.J.)).
- ***In re TJX Companies Retail Security Breach Litigation:*** The firm served as co-lead counsel in this multidistrict litigation brought on behalf of individuals whose personal and financial data was compromised in the then-largest theft of personal data in history. The breach involved more than 45 million credit and debit card numbers and 450,000 customers' driver's license numbers. The case was settled for benefits valued at over \$200 million. Class members whose driver's license numbers were at risk were entitled to 3 years of credit monitoring and identity theft insurance (a value of \$390 per person based on the retail cost for this service), reimbursement of actual identity theft losses, and reimbursement of driver's license replacement costs. Class members whose credit and debit card numbers were at risk were entitled to cash of \$15-\$30 or store vouchers of \$30-\$60. (No. 1:07-cv-10162-WGY, (D. Mass.)).
- ***In re: Heartland Payment Systems, Inc. Customer Data Security Breach Litigation:*** The firm served on the Executive Committee of this multidistrict litigation and obtained a

settlement of cash and injunctive relief for a class of 130 million credit card holders whose credit card information was stolen by computer hackers. The breach was the largest known theft of credit card information in history. (No. 4:09-MD-2046 (S.D. Tex. 2009)).

- ***In re: Countrywide Financial Corp. Customer Data Security Breach Litigation:*** The firm served on the Executive Committee of this multidistrict litigation and obtained a settlement for a class of 17 million individuals whose personal information was at risk when a rogue employee sold their information to unauthorized third parties. Settlement benefits included: (i) reimbursement of several categories of out-of-pocket costs; (ii) credit monitoring and identity theft insurance for 2 years for consumers who did not accept Countrywide's prior offer of credit monitoring; and (iii) injunctive relief. The settlement was approved by the court in 2010. (3:08-md-01998-TBR (W.D. Ky. 2008)).
- ***In re Educational Testing Service Praxis Principles of Learning and Teaching: Grades 7-12 Litigation:*** The firm served on the plaintiffs' steering committee and obtained an \$11.1 million settlement in 2006 on behalf of persons who were incorrectly scored on a teacher's licensing exam. (MDL No. 1643 (E.D. La.)).
- ***Salvucci v. Volkswagen of America, Inc. d/b/a Audi of America, Inc.:*** The firm served as co-lead counsel in litigation brought on behalf of a nationwide class alleging that defendants failed to disclose that its vehicles contained defectively designed timing belt tensioners and associated parts and that defendants misrepresented the appropriate service interval for replacement of the timing belt tensioner system. After extensive discovery, a settlement was reached. (Docket No. ATL-1461-03 (N.J. Sup. Ct. 2007)).

Corporate Governance and Shareholder Rights

Berger Montague protects the interests of individual and institutional investors in shareholder derivative actions in state and federal courts across the United States. Our attorneys help individual and institutional investors reform poor corporate governance, as well as represent them in litigation against directors of a company for violating their fiduciary duty or provide guidance on shareholder rights.

- ***Emil Rossdeutscher and Dennis Kelly v. Viacom:*** The firm, as lead counsel, obtained a settlement resulting in a fund of \$14.25 million for the class. (C.A. No. 98C-03-091 (JEB) (Del. Super. Ct.)).
- ***Fox v. Riverview Realty Partners, f/k/a Prime Group Realty Trust, et al.:*** The firm, as lead counsel, obtained a settlement resulting in a fund of \$8.25 million for the class.

Credit Reporting and Background Checks

Berger Montague's credit reporting and background checks practice group litigates on behalf of consumers nationwide to protect them against violations of their rights under the Fair Credit Reporting Act ("FCRA") and other laws that govern credit reports and background checks. In particular, Berger Montague has developed an expertise in recent years representing consumers

who have been inaccurately reported as matches to the Office of Foreign Assets Control Specially Designated Nationals List (the “OFAC List”). In OFAC cases and others, our FCRA attorneys have successfully represented hundreds of thousands of consumers across the country and have obtained relief valued in the billions of dollars for our clients.

- ***In re Public Records Fair Credit Reporting Act Litigation:*** Berger Montague served as class counsel in three separate FCRA class action lawsuits involving how the big three credit bureaus—Experian, TransUnion, and Equifax—reported public records, including tax liens and civil judgments. The settlements provided groundbreaking injunctive relief valued at over \$1 billion, as well as a streamlined process for consumers to receive *uncapped* monetary payments for claims related to inaccurate reporting of public records.

Stewart v. Lexis-Nexis: Berger Montague served as class counsel in this FCRA class action lawsuit involving how Lexis-Nexis retrieved and reported judgment, lien, landlord-tenant and motor vehicle records. The settlement provided a cash settlement fund of \$21.5 million, as well as substantial injunctive relief that impacted how Lexis-Nexis collects and sells public records information on an ongoing basis. The injunctive relief impacted well over 20 million individuals.

- ***Fernandez v. RentGrow, Inc.:*** Berger Montague currently serves as class counsel in this case, alleging that defendant violated the FCRA by reporting consumers as possible matches to the OFAC List based on a loose, name-only algorithm. In 2022, the court certified a nationwide class of roughly 71,000 impacted consumers, a decision which defendant is currently appealing and which Berger Montague is advocating to uphold.
- ***Hill-Green v. Experian:*** Berger Montague served as class counsel in this FCRA class action lawsuit involving how Experian reported so-called “fraud indicators” based on a comparison on addresses associated with a given consumer. The settlement provided a cash settlement fund of \$22.45 million, as well as substantial injunctive relief that impacted how Experian collects and sells products related to fraud on an ongoing basis.
- ***Rodriguez v. National Credit Center, LLC:*** Berger Montague currently represents a class of consumers who allege that they were inaccurately identified as being on the OFAC List during the course of a credit transaction. The parties have reached an agreement in principle to resolve this matter on a class-wide basis, the terms of which are presently confidential, but which the parties anticipate filing shortly.
- ***Saylor v. Realpage:*** Berger Montague represented a class of consumers who alleged that they were inaccurately identified as sex offenders to prospective landlords. The case ultimately settled for \$9.73 million, plus injunctive relief addressing the company’s procedures.
- ***In re: TransUnion Rental Screening Sols., Inc. FCRA Litig.:*** Berger Montague served as lead class counsel in this multi-district litigation consolidated class action, alleging

violations of Section 1681e(b) of the FCRA. When the case finally settled, defendant agreed to significant practice changes to improve its criminal record and landlord-tenant record reporting, and to establish a \$11.5 million settlement fund.

- ***Gambles v. Sterling Infosystems, Inc.***: Berger Montague served as class counsel in this class action alleging that defendant reported as “high risk” addresses that were older than seven years from the date of the consumer’s report, thereby violating Section 1681c of the FCRA. The firm obtained a \$15 million settlement on behalf of more than 200,000 consumers nationwide.
- ***Hillson v. Kelly Services, Inc.***: In this class action, Berger Montague represented three job applicants who alleged that defendant violated 15 U.S.C. § 1681b(b)(2) by failing to provide to them a stand-alone disclosure that defendant might obtain consumer reports to assess their employability. Berger Montague successfully settled the case, achieving a \$6,749,000 settlement for hundreds of thousands of individuals.
- ***Taylor v. Inflection Risk Solutions, LLC***: Here, Berger Montague litigated class action claims alleging that defendant violated 15 U.S.C. § 1681e(b) by inaccurately reporting criminal records on background checks. The firm secured a \$4 million settlement on behalf of consumers nationwide, as well as injunctive relief to improve defendant’s procedures.

Employee Benefits & ERISA

Berger Montague represents employees who have claims under the federal Employee Retirement Income Security Act. We litigate cases on behalf of employees whose 401(k) and pension investments have suffered losses as a result of the breach of fiduciary duties by plan administrators and the companies they represent. Berger Montague has recovered hundreds of millions of dollars in lost retirement benefits for American workers and retirees, and also gained favorable changes to their retirement plans.

- ***Diebold v. Northern Trust Investments, N.A.***: As co-lead counsel in this ERISA breach of fiduciary duty case, the firm secured a \$36 million settlement on behalf of participants in retirement plans who participated in Northern Trust’s securities lending program. Plaintiffs alleged that defendants breached their ERISA fiduciary duties by failing to manage properly two collateral pools that held cash collateral received from the securities lending program. The settlement represented a recovery of more than 25% of alleged class member losses. (No. 1:09-cv-01934 (N.D. Ill.)).
- ***Glass Dimensions, Inc. v. State Street Bank & Trust Co.***: The firm served as co-lead counsel in this ERISA case that alleged that defendants breached their fiduciary duties to the retirement plans it managed by taking unreasonable compensation for managing the securities lending program in which the plans participated. After the court certified a class of the plans that participated in the securities lending program at issue, the case settled for \$10 million on behalf of 1,500 retirement plans that invested in defendants’ collective investment funds. (No. 1:10-cv-10588-DPW (D. Mass)).

- ***In re Eastman Kodak ERISA Litigation***: The firm served as class counsel in this ERISA breach of fiduciary duty class action which alleged that defendants breached their fiduciary duties to Kodak retirement plan participants by allowing plan investments in Kodak common stock. The case settled for \$9.7 million. (Master File No. 6:12-cv-06051-DGL (W.D.N.Y.)).
- ***Lequita Dennard v. Transamerica Corp. et al.***: The firm served as counsel to plan participants who alleged that they suffered losses when plan fiduciaries failed to act solely in participants' interests, as ERISA requires, when they selected, removed and monitored plan investment options. The case settled for structural changes to the plan and \$3.8 million monetary payment to the class. (Civil Action No. 1:15-cv-00030-EJM (N.D. Iowa)).

Employment & Unpaid Wages

The Berger Montague Employment & Unpaid Wages Department works tirelessly to safeguard the rights of employees and devotes all of their energies to helping the firm's clients achieve their goals. Our attorneys' understanding of federal and state wage and hour laws, federal and state civil rights and discrimination laws, ERISA, the WARN Act, laws protecting whistleblowers, such as federal and state False Claims Acts, and other employment laws, allows us to develop creative strategies to vindicate our clients' rights and help them secure the compensation to which they are entitled.

Berger Montague is at the forefront of class action litigation, seeking remedies for employees under the Fair Labor Standards Act, state wage and hour law, breach of contract, unjust enrichment, and other state common law causes of action.

Berger Montague's Employment & Unpaid Wages Group, which is chaired by Executive Shareholder Shanon Carson, is repeatedly recognized for outstanding success in effectively representing its clients. In 2015, *The National Law Journal* selected Berger Montague as the top plaintiffs' law firm in the Employment Law category at the Elite Trial Lawyers awards ceremony. Portfolio Media, which publishes *Law360*, also recognized Berger Montague as one of the eight Top Employment Plaintiffs' Firms in 2009.

Representative cases include the following:

- ***Fenley v. Wood Group Mustang, Inc.***: The firm served as lead counsel and obtained a settlement of \$6.25 million on behalf of a class of oil and gas inspectors who allegedly did not receive overtime compensation for hours worked in excess of 40 per week. (Civil Action No. 2:15-cv-326 (S.D. Ohio)).
- ***Sanders v. The CJS Solutions Group, LLC***: The firm served as co-lead counsel and obtained a settlement of \$3.24 million on behalf of a class of IT healthcare consultants who allegedly did not receive overtime premiums for hours worked in excess of 40 per week. (Civil Action No. 17-3809 (S.D.N.Y.)).

- ***Gundrum v. Cleveland Integrity Services, Inc.:*** The firm served as lead counsel and obtained a settlement of \$4.5 million on behalf of a class of oil and gas inspectors who allegedly did not receive overtime compensation for hours worked in excess of 40 per week. (Civil Action No. 4:17-cv-55 (N.D. Okl.)).
- ***Fenley v. Applied Consultants, Inc.:*** The firm served as lead counsel and obtained a settlement of \$9.25 million on behalf of a class of oil and gas inspectors who allegedly did not receive overtime compensation for hours worked in excess of 40 per week. (Civil Action No. 2:15-cv-259 (W.D. Pa.)).
- ***Acevedo v. Brightview Landscapes, LLC:*** The firm served as co-lead counsel and obtained a settlement of \$6.95 million on behalf of a class of landscaping crew members who allegedly did not receive proper overtime premiums for hours worked in excess of 40 per week. (Civil Action No. 3:13-cv-02529 (M.D. Pa.)).
- ***Jantz v. Social Security Administration:*** The firm served as co-lead counsel and obtained a settlement on behalf of employees with targeted disabilities (“TDEs”) alleged that SSA discriminated against TDEs by denying them promotional and other career advancement opportunities. The settlement was reached after more than ten years of litigation, and the Class withstood challenges to class certification on four separate occasions. The settlement includes a monetary fund of \$9.98 million and an unprecedented package of extensive programmatic changes valued at approximately \$20 million. (EEOC No. 531-2006-00276X (2015)).
- ***Ciamillo v. Baker Hughes, Incorporated:*** The firm served as lead counsel and obtained a settlement of \$5 million on behalf of a class of oil and gas workers who allegedly did not receive any overtime compensation for working hours in excess of 40 per week. (Civil Action No. 14-cv-81 (D. Alaska)).
- ***Salcido v. Cargill Meat Solutions Corp.:*** The firm served as co-lead counsel and obtained a settlement of \$7.5 million on behalf of a class of thousands of employees of Cargill Meat Solutions Corp. alleging that they were forced to work off-the-clock and during their breaks. This is one of the largest settlements of this type of case involving a single plant in U.S. history. (Civil Action Nos. 1:07-cv-01347-LJO-GSA and 1:08-cv-00605-LJO-GSA (E.D. Cal.)).
- ***Chabrier v. Wilmington Finance, Inc.:*** The firm served as co-lead counsel and obtained a settlement of \$2,925,000 on behalf of loan officers who worked in four offices to resolve claims for unpaid overtime wages. A significant opinion issued in the case is *Chabrier v. Wilmington Finance, Inc.*, 2008 WL 938872 (E.D. Pa. April 04, 2008) (denying the defendant’s motion to decertify the class). (No. 06-4176 (E.D. Pa.)).

- ***Bonnette v. Rochester Gas & Electric Co.***: The firm served as co-lead counsel and obtained a settlement of \$2 million on behalf of a class of African American employees of Rochester Gas & Electric Co. to resolve charges of racial discrimination in hiring, job assignments, compensation, promotions, discipline, terminations, retaliation, and a hostile work environment. (No. 07-6635 (W.D.N.Y.)).

Environment & Public Health

Berger Montague lawyers are trailblazers in the fields of environmental class action litigation and mass torts. Our attorneys have earned their reputation in the fields of environmental litigation and mass torts by successfully prosecuting some of the largest, most well-known cases of our time. Our Environment & Public Health Group also prosecutes significant claims for personal injury, commercial losses, property damage, and environmental response costs. In 2016, Berger Montague was named an Elite Trial Lawyer Finalist in special litigation (environmental) by *The National Law Journal*.

- ***Cook v. Rockwell International Corporation***: In February 2006, the firm won a \$554 million jury verdict on behalf of thousands of property owners whose homes were exposed to plutonium from the former Rocky Flats nuclear weapons site northwest of Denver, Colorado. Judgment in the case was entered by the court in June 2008 which, with interest, totaled \$926 million. Recognizing this tremendous achievement, the Public Justice Foundation bestowed its prestigious Trial Lawyer of the Year Award for 2009 on Merrill G. Davidoff, David F. Sorensen, and the entire trial team for their “long and hard-fought” victory against “formidable corporate and government defendants.” (No. 90-cv-00181-JLK (D. Colo.)). The jury verdict in that case was vacated on appeal in 2010, but on a second trip to the Tenth Circuit, Plaintiffs secured a victory in 2015, with the case then being sent back to the district court. A \$375 million settlement was reached in May 2016, and final approval by the district court was obtained in April 2017.
- ***In re Exxon Valdez Oil Spill Litigation***: On September 16, 1994, a jury trial of several months duration resulted in a record punitive damages award of \$5 billion against the Exxon defendants as a consequence of one of the largest oil spills in U.S. history. The award was reduced to \$507.5 million pursuant to a Supreme Court decision. David Berger was co-chair of the plaintiffs’ discovery committee (appointed by both the federal and state courts). Harold Berger served as a member of the organizing case management committee. H. Laddie Montague was specifically appointed by the federal court as one of the four designated trial counsel. Both Mr. Montague and Peter Kahana shared (with the entire trial team) the 1995 “Trial Lawyer of the Year Award” given by the Trial Lawyers for Public Justice. (No. A89-0095-CVCHRH (D. Alaska)).
- ***Drayton v. Pilgrim’s Pride Corp.***: The firm served as counsel in a consolidation of wrongful death and other catastrophic injury cases brought against two manufacturers of turkey products, arising out of a 2002 outbreak of *Listeria Monocytogenes* in the Northeastern United States, which resulted in the recall of over 32 million pounds of turkey – the second largest meat recall in U.S. history at that time. A significant opinion issued in

the case is *Drayton v. Pilgrim's Pride Corp.*, 472 F. Supp. 2d 638 (E.D. Pa. 2006) (denying the defendants' motions for summary judgment and applying the alternative liability doctrine). All of the cases settled on confidential terms in 2006. (No. 03-2334 (E.D. Pa.)).

- ***In re Three Mile Island Litigation:*** As lead/liaison counsel, the firm successfully litigated the case and reached a settlement in 1981 of \$25 million in favor of individuals, corporations and other entities suffering property damage as a result of the nuclear incident involved. (C.A. No. 79-0432 (M.D. Pa.)).

Insurance Fraud

When insurance companies and affiliated financial services entities engage in fraudulent, deceptive or unfair practices, Berger Montague helps injured parties recover their losses. We focus on fraudulent, deceptive and unfair business practices across all lines of insurance and financial products and services sold by insurers and their affiliates, which include annuities, securities and other investment vehicles.

- ***Spencer v. Hartford Financial Services Group, Inc.:*** The firm, together with co-counsel, prosecuted this national class action against The Hartford Financial Services Group, Inc. and its affiliates in the United States District Court for the District of Connecticut (*Spencer v. Hartford Financial Services Group, Inc.*, Case No. 05-cv-1681) on behalf of approximately 22,000 claimants, each of whom entered into structured settlements with Hartford property and casualty insurers to settle personal injury and workers' compensation claims. To fund these structured settlements, the Hartford property and casualty insurers purchased annuities from their affiliate, Hartford Life. By purchasing the annuity from Hartford Life, The Hartford companies allegedly were able to retain up to 15% of the structured amount of the settlement in the form of undisclosed costs, commissions and profit - all of which was concealed from the settling claimants. On March 10, 2009, the U.S. District Court certified for trial claims on behalf of two national subclasses for civil RICO and fraud (256 F.R.D. 284 (D. Conn. 2009)). On October 14, 2009, the Second Circuit Court of Appeals denied The Hartford's petition for interlocutory appeal under Federal Rule of Civil Procedure 23(f). On September 21, 2010, the U.S. District Court entered judgment granting final approval of a \$72.5 million cash settlement.
- ***Nationwide Mutual Insurance Company v. O'Dell:*** The firm, together with co-counsel, prosecuted this class action against Nationwide Mutual Insurance Company in West Virginia Circuit Court, Roane County (*Nationwide Mutual Insurance Company v. O'Dell*, Case No. 00-C-37), on behalf of current and former West Virginia automobile insurance policyholders, which arose out of Nationwide's failure, dating back to 1993, to offer policyholders the ability to purchase statutorily-required optional levels of underinsured ("UIM") and uninsured ("UM") motorist coverage in accordance with West Virginia Code 33-6-31. The court certified a trial class seeking monetary damages, alleging that the failure to offer these optional levels of coverage, and the failure to provide increased first party benefits to personal injury claimants, breached Nationwide's insurance policies and its duty of good faith and fair dealing, and violated the West Virginia Unfair Trade Practices

Act. On June 25, 2009, the court issued final approval of a settlement that provided a minimum estimated value of \$75 million to Nationwide auto policyholders and their passengers who were injured in an accident or who suffered property damage.

Predatory Lending and Borrowers' Rights

Berger Montague's attorneys fight vigorously to protect the rights of borrowers when they are injured by the practices of banks and other financial institutions that lend money or service borrowers' loans. Berger Montague has successfully obtained multi-million-dollar class action settlements for nationwide classes of borrowers against banks and financial institutions and works tirelessly to protect the rights of borrowers suffering from these and other deceptive and unfair lending practices.

- ***Coonan v. Citibank, N.A.***: The firm, as Co-Lead Counsel, prosecuted this national class action against Citibank and its affiliates in the United States District Court for the Northern District of New York concerning alleged kickbacks Citibank received in connection with its force-placed insurance programs. The firm obtained a settlement of \$122 million on behalf of a class of hundreds of thousands of borrowers.
- ***Arnett v. Bank of America, N.A.***: The firm, as Co-Lead Counsel, prosecuted this national class action against Bank of America and its affiliates in the United States District Court for the District of Oregon concerning alleged kickbacks received in connection with its force-placed flood insurance program. The firm obtained a settlement of \$31 million on behalf of a class of hundreds of thousands of borrowers.
- ***Clements v. JPMorgan Chase Bank, N.A.***: The firm, as Co-Lead Counsel, prosecuted this national class action against JPMorgan Chase and its affiliates in the United States District Court for the Northern District of California concerning alleged kickbacks received in connection with its force-placed flood insurance program. The firm obtained a settlement of \$22,125,000 on behalf of a class of thousands of borrowers.
- ***Holmes v. Bank of America, N.A.***: The firm, as Co-Lead Counsel, prosecuted this national class action against Bank of America and its affiliates in the United States District Court for the Western District of North Carolina concerning alleged kickbacks received in connection with its force-placed wind insurance program. The firm obtained a settlement of \$5.05 million on behalf of a class of thousands of borrowers.

Securities & Investor Protection

In the area of securities litigation, the firm has represented public institutional investors – such as the retirement funds for the States of Pennsylvania, Connecticut, New Hampshire, New Jersey, Louisiana and Ohio, as well as the City of Philadelphia and numerous individual investors and private institutional investors. The firm was co-lead counsel in the *Melridge Securities Litigation* in the Federal District Court in Oregon, in which jury verdicts of \$88.2 million and a RICO judgment of \$239 million were obtained. Berger Montague has served as lead or co-lead counsel in

numerous other major securities class action cases where substantial settlements were achieved on behalf of investors.

- ***In re Merrill Lynch Securities Litigation:*** Berger Montague, as co-lead counsel, obtained a recovery of \$475 million for the benefit of the class in one of the largest recoveries among the recent financial crisis cases. (No. 07-cv-09633 (S.D.N.Y.)).
- ***In re: Oppenheimer Rochester Funds Group Securities Litigation:*** The firm, as co-lead counsel, obtained a \$89.5 million settlement on behalf of investors in six tax-exempt bond mutual funds managed by OppenheimerFunds, Inc. (No. 09-md-02063-JLK (D. Col.)).
- ***In re KLA Tencor Securities Litigation:*** The firm, as a member of Plaintiffs' Counsel's Executive Committee, obtained a cash settlement of \$65 million in an action on behalf of investors against KLA-Tencor and certain of its officers and directors. (No. 06-cv-04065 (N.D. Cal.)).
- ***In re NetBank, Inc. Securities Litigation:*** The firm served as lead counsel in this certified class action on behalf of the former common shareholders of NetBank, Inc. The \$12.5 million settlement, which occurred after class certification proceedings and substantial discovery, is particularly noteworthy because it is one of the few successful securities fraud class actions litigated against a subprime lender and bank in the wake of the financial crisis. (No. 07-cv-2298-TCB (N.D. Ga.)).
- ***The City Of Hialeah Employees' Retirement System v. Toll Brothers, Inc.:*** The firm, as co-lead counsel, obtained a class settlement of \$25 million against Home Builder Toll Brothers, Inc. (No. 07-cv-1513 (E.D. Pa.)).
- ***In re Alcatel Alsthom Securities Litigation:*** The firm, as co-lead counsel, obtained a class settlement for investors of \$75 million cash. (MDL Docket No. 1263 (PNB) (E.D. Tex.)).
- ***Qwest Securities Action:*** The firm represented New Jersey in an opt-out case against Qwest and certain officers, which was settled for \$45 million. (C.A. No. L-3838-02 (Superior Court New Jersey, Law Division)).

Whistleblower, Qui Tam, and False Claims Act

Berger Montague has represented whistleblowers in matters involving healthcare fraud, defense contracting fraud, IRS fraud, securities fraud, and commodities fraud, helping to return more than \$3 billion to federal and state governments. In return, whistleblower clients retaining Berger Montague to represent them in state and federal courts have received more than \$500 million in rewards. Berger Montague's time-tested approach in whistleblower/*qui tam* representation involves cultivating close, productive attorney-client relationships with the maximum degree of confidentiality for our clients.

Judicial Praise for Berger Montague Attorneys

Berger Montague's record of successful prosecution of class actions and other complex litigation has been recognized and commended by judges and arbitrators across the country. Some remarks on the skill, efficiency, and expertise of the firm's attorneys are excerpted below.

Antitrust Cases

From **Judge Lorna G. Schofield**, of the U.S. District Court for the Southern District of New York:

"I'm not sure I've ever seen a case without a single objection or opt-out, so congratulations on that."

Transcript of the November 19, 2020 Hearing in ***Contant, et al. v. Bank of America Corp., et al.***, No. 1:17-cv-03139 (S.D.N.Y.).

From **Judge William E. Smith**, of the U.S. District Court for the District of Rhode Island:

"The degree to which you all litigated the case is – you know, I can't imagine attorneys litigating a case more rigorously than you all did in this case. It seems like every conceivable, legitimate, substantive dispute that could have been fought over was fought over to the max. So you, both sides, I think litigated the case as vigorously as any group of attorneys could. The level of representation of all parties in terms of the sophistication of counsel was, in my view, of the highest levels. I can't imagine a case in which there was really a higher quality of representation across the board than this one."

Transcript of the August 27, 2020 Hearing in ***In re Loestrin 24 Fe Antitrust Litigation***, No. 13-md-02472 (D.R.I.).

From **Judge Margo K. Brodie**, of the U.S. District Court for the Eastern District of New York:

"Class counsel has without question done a tremendous job in litigating this case. They represent some of the best plaintiff-side antitrust groups in the country, and the size and skill of the defense they litigated against cannot be overstated. They have also demonstrated the utmost professionalism despite the demands of the extreme perseverance that this case has required..."

In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, No. 1:05-md-01720 (E.D.N.Y. 2019) (Mem. & Order)

From **Judge Brian M. Cogan**, of the U.S. District Court of the Eastern District of New York:

“This is a substantial recovery that has the deterrent effect that class actions are supposed to have, and I think it was done because we had really good Plaintiffs’ lawyers in this case who were running it.”

Transcript of the June 24, 2019 Fairness Hearing in *In re Dental Supplies Antitrust Litigation*, No. 16-cv-696 (E.D.N.Y.).

From **Judge Michael M. Baylson**, of the U.S. District Court of the Eastern District of Pennsylvania:

“[C]ounsel...for direct action plaintiffs have done an outstanding job here with representing the class, and I thought your briefing was always very on point. I thought the presentation of the very contentious issues on the class action motion was very well done, it was very well briefed, it was well argued.”

Transcript of the June 28, 2018 Hearing in *In re Domestic Drywall Antitrust Litigation*, No. MD-13-2437 at 11:6-11.

From **Judge Madeline Cox Arleo**, of the U.S. District Court for the District of New Jersey praising the efforts of all counsel:

“I just want to thank you for an outstanding presentation. I don’t say that lightly . . . it’s not lost on me at all when lawyers come very, very prepared. And really, your clients should be very proud to have such fine lawyering. I don’t see lawyering like this every day in the federal courts, and I am very grateful. And I appreciate the time and the effort you put in, not only to the merits, but the respect you’ve shown for each other, the respect you’ve shown for the Court, the staff, and the time constraints. And as I tell my law clerks all the time, good lawyers don’t fight, good lawyers advocate. And I really appreciate that more than I can express.”

Transcript of the September 9 to 11, 2015 Daubert Hearing in *Castro v. Sanofi Pasteur*, No. 11-cv-07178 (D.N.J.) at 658:14-659:4.

From **Judge William H. Pauley, III**, of the U.S. District Court of the Southern District of New York:

“Class Counsel did their work on their own with enormous attention to detail and unflagging devotion to the cause. Many of the issues in this litigation . . . were unique and issues of first impression.”

* * *

“Class Counsel provided extraordinarily high-quality representation. This case raised a number of unique and complex legal issues The law firms of Berger Montague and Coughlin Stoia were indefatigable. They represented the Class with a high degree of

professionalism, and vigorously litigated every issue against some of the ablest lawyers in the antitrust defense bar.”

In re Currency Conversion Fee Antitrust Litigation, 263 F.R.D. 110, 129 (2009).

From **Judge Faith S. Hochberg**, of the United States District court for the District of New Jersey:

“[W]e sitting here don’t always get to see such fine lawyering, and it’s really wonderful for me both to have tough issues and smart lawyers ... I want to congratulate all of you for the really hard work you put into this, the way you presented the issues, ... On behalf of the entire federal judiciary I want to thank you for the kind of lawyering we wish everybody would do.”

In re Remeron Antitrust Litig., Civ. No. 02-2007 (Nov. 2, 2005).

From U.S. District **Judge Jan DuBois**, of the U.S. District Court of the Eastern District of Pennsylvania:

“[T]he size of the settlements in absolute terms and expressed as a percentage of total damages evidence a high level of skill by petitioners ... The Court has repeatedly stated that the lawyering in the case at every stage was superb, and does so again.”

In re Linerboard Antitrust Litig., 2004 WL 1221350, at *5-*6 (E.D. Pa. 2004).

From **Judge Nancy G. Edmunds**, of the U.S. District Court of the Eastern District of Michigan:

“[T]his represents an excellent settlement for the Class and reflects the outstanding effort on the part of highly experienced, skilled, and hard working Class Counsel...[T]heir efforts were not only successful, but were highly organized and efficient in addressing numerous complex issues raised in this litigation[.]”

In re Cardizem CD Antitrust Litig., MDL No. 1278 (E.D. Mich., Nov. 26, 2002).

From **Judge Charles P. Kocoras**, of the U.S. District Court for the Northern District of Illinois:

“The stakes were high here, with the result that most matters of consequence were contested. There were numerous trips to the courthouse, and the path to the trial court and the Court of Appeals frequently traveled. The efforts of counsel for the class has [sic] produced a substantial recovery, and it is represented that the cash settlement alone is the second largest in the history of class action litigation. . . .There is no question that the results achieved by class counsel were extraordinary [.]”

Regarding the work of Berger Montague in achieving more than \$700 million in settlements with some of the defendants in *In Re Brand Name Prescription Drugs Antitrust Litigation*, 2000 U.S. Dist. LEXIS 1734, at *3-*6 (N.D. Ill. Feb. 9, 2000).

From **Judge Peter J. Messitte**, of the U.S. District Court for the District of Maryland:

“The experience and ability of the attorneys I have mentioned earlier, in my view in reviewing the documents, which I have no reason to doubt, the plaintiffs’ counsel are at the top of the profession in this regard and certainly have used their expertise to craft an extremely favorable settlement for their clients, and to that extent they deserve to be rewarded.”

Settlement Approval Hearing, Oct. 28, 1994, in *Spawd, Inc. and General Generics v. Bolar Pharmaceutical Co., Inc.*, CA No. PJM-92-3624 (D. Md.).

From **Judge Donald W. Van Artsdalen**, of the U.S. District Court for the Eastern District of Pennsylvania:

“As to the quality of the work performed, although that would normally be reflected in the not immodest hourly rates of all attorneys, for which one would expect to obtain excellent quality work at all times, the results of the settlements speak for themselves. Despite the extreme uncertainties of trial, plaintiffs’ counsel were able to negotiate a cash settlement of a not insubstantial sum, and in addition, by way of equitable relief, substantial concessions by the defendants which, subject to various condition, will afford the right, at least, to lessee-dealers to obtain gasoline supply product from major oil companies and suppliers other than from their respective lessors. The additional benefits obtained for the classes by way of equitable relief would, in and of itself, justify some upward adjustment of the lodestar figure.”

Bogosian v. Gulf Oil Corp., 621 F. Supp. 27, 31 (E.D. Pa. 1985).

From **Judge Krupansky**, who had been elevated to the Sixth Circuit Court of Appeals:

“Finally, the court unhesitatingly concludes that the quality of the representation rendered by counsel was uniformly high. The attorneys involved in this litigation are extremely experienced and skilled in their prosecution of antitrust litigation and other complex actions. Their services have been rendered in an efficient and expeditious manner, but have nevertheless been productive of highly favorable result.”

In re Art Materials Antitrust Litigation, 1984 CCH Trade Cases ¶65,815 (N.D. Ohio 1983).

From **Judge Joseph Blumenfeld**, of the U.S. District Court for the District of Connecticut:

“The work of the Berger firm showed a high degree of efficiency and imagination, particularly in the maintenance and management of the national class actions.”

In re Master Key Antitrust Litigation, 1977 U.S. Dist. LEXIS 12948, at *35 (Nov. 4, 1977).

Securities & Investor Protection Cases

From **Judge Brantley Starr** of the U.S. District Court for the Northern District of Texas, Dallas Division:

“I think y’all have been a model on how to handle a case like this. So I appreciate the diligence y’all have put in separating the fee negotiations until after the main event is resolved...Everything I see here is in great shape, and really a testament to y’all’s diligence and professionalism. So hats off to y’all...So thanks again for your professionalism in handling this case and handling the stipulated settlement. Y’all are model citizens, and so I wish I could send everyone to y’all’s school of litigation management.”

Howell Family Trust DTD 1/27/2004 v. Hollis Greenlaw, et al., No. 3:18-cv-02864-X (N.D. Tex., March 25, 2021).

From **Judge Jed Rakoff** of the U.S. District Court for the Southern District of New York:

Court stated that lead counsel had made “very full and well-crafted” and “excellent submissions”; that there was a “very fine job done by plaintiffs’ counsel in this case”; and that this was “surely a very good result under all the facts and circumstances.”

In re Merrill Lynch & Co., Inc. Securities, Derivative & ERISA Litigation, Master File No. 07-cv-9633(JSR)(DFE) (S.D.N.Y., July 27, 2009).

From **Judge Michael M. Baylson** of the U.S. District Court for the Eastern District of Pennsylvania:

“The Court is aware of and attests to the skill and efficiency of class counsel: they have been diligent in every respect, and their briefs and arguments before the Court were of the highest quality. The firm of Berger Montague took the lead in the Court proceedings; its attorneys were well prepared, articulate and persuasive.”

In re CIGNA Corp. Sec. Litig., 2007 U.S. Dist. LEXIS 51089, at *17-*18 (E.D. Pa. July 13, 2007).

From **Judge Stewart Dalzell** of the U.S. District Court for the Eastern District of Pennsylvania:

“The quality of lawyering on both sides, but I am going to stress now on the plaintiffs’ side, simply has not been exceeded in any case, and we have had some marvelous counsel appear before us and make superb arguments, but they really don’t come any better than Mrs. Savett... [A]nd the arguments we had on the motion to dismiss [Mrs. Savett argued the motion], both sides were fabulous, but plaintiffs’ counsel were as good as they come.”

In re U.S. Bioscience Secs. Litig., No. 92-0678 (E.D. Pa. April 4, 1994).

From **Judge Wayne Andersen** of the U.S. District Court for the Northern District of Illinois:

“[Y]ou have acted the way lawyers at their best ought to act. And I have had a lot of cases...in 15 years now as a judge and I cannot recall a significant case where I felt people were better represented than they are here...I would say this has been the best representation that I have seen.”

In re: Waste Management, Inc. Secs. Litig., No. 97-C 7709 (N.D. Ill. 1999).

From **Chancellor William Chandler, III** of the Delaware Chancery Court:

“All I can tell you, from someone who has only been doing this for roughly 22 years, is that I have yet to see a more fiercely and intensely litigated case than this case. Never in 22 years have I seen counsel going at it, hammer and tong, like they have gone at it in this case. And I think that’s a testimony – Mr. Valihura correctly says that’s what they are supposed to do. I recognize that; that is their job, and they were doing it professionally.”

Ginsburg v. Philadelphia Stock Exchange, Inc., No. 2202 (Del. Ch., Oct. 22, 2007).

From **Judge Stewart Dalzell** of the U.S. District Court for the Eastern District of Pennsylvania:

“Thanks to the nimble class counsel, this sum, which once included securities worth \$149.5 million is now all cash. Seizing on an opportunity Rite Aid presented, class counsel first renegotiated what had been stock consideration into Rite Aid Notes and then this year monetized those Notes. Thus, on February 11, 2003, Rite Aid redeemed those Notes from the class, which then received \$145,754,922.00. The class also received \$14,435,104 in interest on the Notes.”

“Co-lead counsel ... here were extraordinarily deft and efficient in handling this most complex matter... they were at least eighteen months ahead of the United States Department of Justice in ferreting out the conduct that ultimately resulted in the write down of over \$1.6 billion in previously reported Rite Aid earnings. In short, it would be hard to equal the skill class counsel demonstrated here.”

In re Rite Aid Corp. Securities Litigation, 269 F. Supp. 2d 603, 605, n.1, 611 (E.D. Pa. 2003).

From **Judge Helen J. Frye**, United States District Judge for the U.S. District Court for the District of Oregon:

“In order to bring about this result [partial settlements then totaling \$54.25 million], Class Counsel were required to devote an unusual amount of time and effort over more than eight years of intense legal litigation which included a four-month long jury trial and full briefing and argument of an appeal before the Ninth Circuit Court of Appeals, and which produced one of the most voluminous case files in the history of this District.”

* * *

“Throughout the course of their representation, the attorneys at Berger Montague and Stoll, Stoll, Berne, Lokting & Shlachter who have worked on this case have exhibited an unusual degree of skill and diligence, and have had to contend with opposing counsel who also displayed unusual skill and diligence.”

In Re Melridge, Inc. Securities Litigation, No. CV 87-1426-FR (D. Ore. April 15, 1996).

From **Judge Marvin Katz** of the U.S. District Court for the Eastern District of Pennsylvania:

“[T]he co-lead attorneys have extensive experience in large class actions, experience that has enabled this case to proceed efficiently and professionally even under short deadlines and the pressure of handling thousands of documents in a large multi-district action... These counsel have also acted vigorously in their clients’ interests...”

* * *

“The management of the case was also of extremely high quality.... [C]lass counsel is of high caliber and has extensive experience in similar class action litigation.... The submissions were of consistently high quality, and class counsel has been notably diligent in preparing filings in a timely manner even when under tight deadlines.”

Commenting on class counsel, where the firm served as both co-lead and liaison counsel in ***In re Ikon Office Solutions, Inc. Securities Litigation***, 194 F.R.D. 166, 177, 195 (E.D. Pa. 2000).

From **Judge William K. Thomas**, Senior District Judge for the United States District Court for the Northern District of Ohio:

“In the proceedings it has presided over, this court has become directly familiar with the specialized, highly competent, and effective quality of the legal services performed by Merrill G. Davidoff, Esq. and Martin I. Twersky, Esq. of Berger Montague....”

* * *

“Examination of the experience-studded biographies of the attorneys primarily involved in this litigation and review of their pioneering prosecution of many class actions in antitrust, securities, toxic tort matters and some defense representation in antitrust and other litigation, this court has no difficulty in approving and adopting the hourly rates fixed by Judge Aldrich.”

Commenting in *In re Revco Securities Litigation*, Case No. 1:89CV0593, Order (N.D. Oh. September 14, 1993).

Consumer Protection Cases

From **Judge Paul A. Engelmayer** of the U.S. District Court for the Southern District of New York:

“I know the diligence of counsel and dedication of counsel to the class...Thank you, Ms. Drake. As always I appreciate the – your extraordinary dedication to your – to the class and the very obvious backwards and forwards familiarity you have with the case and level of preparation and articulateness today. It’s a pleasure always to have you before me...Class Counsel [] generated this case on their own initiative and at their own risk. Counsel’s enterprise and ingenuity merits significant compensation...Counsel here are justifiably proud of the important result that they achieved.”

Sept. 22, 2020, Final Approval Hearing, *Gambles v. Sterling Info., Inc.*, No. 15-cv-9746.

From **Judge Joel Schneider** of the U.S. District Court for the District of New Jersey:

“I do want to compliment all counsel for how they litigated this case in a thoroughly professional manner. All parties were zealously represented in the highest ideals of the profession, legitimately and professionally, and not the usual acrimony we see in these cases...I commend the parties and their counsel for a very workmanlike professional effort.”

Transcript of the September 10, 2020 Final Fairness Hearing in *Somogyi, et al. v. Freedom Mortgage Corp.*

From **Judge Harold E. Kahn** of the Superior Court of California County of San Francisco:

“You are extraordinarily impressive. And I thank you for being here, and for your candid, non-evasive response to every question I have. I was extremely skeptical at the outset of this morning. You have allayed all of my concerns and have persuaded me that this is an important issue, and that you have done a great service to the class. And for that reason, I am going to approve your settlement in all respects, including the motion for attorneys’ fees. And I congratulate you on your excellent work.”

Transcript of the November 7, 2017 Hearing in **Loretta Nesbitt v. Postmates, Inc.**, No. CGC-15-547146

Civil/Human Rights Cases

From **Deputy Treasury Secretary Stuart E. Eizenstat**:

“We must be frank. It was the American lawyers, through the lawsuits they brought in U.S. courts, who placed the long-forgotten wrongs by German companies during the Nazi era on the international agenda. It was their research and their work which highlighted these old injustices and forced us to confront them. Without question, we would not be here without them.... For this dedication and commitment to the victims, we should always be grateful to these lawyers.”

In his remarks at the July 17, 2000, signing ceremony for the international agreements which established the German Foundation to act as a funding vehicle for the payment of claims to Holocaust survivors.

Insurance Litigation

From **Judge Janet C. Hall**, of the U.S. District Court of the District of Connecticut:

Noting the “very significant risk in pursuing this action” given its uniqueness in that “there was no prior investigation to rely on in establishing the facts or a legal basis for the case....[and] no other prior or even now similar case involving parties like these plaintiffs and a party like these defendants.” Further, “the quality of the representation provided to the plaintiffs ... in this case has been consistently excellent.... [T]he defendant[s] ... mounted throughout the course of the five years the case pended, an extremely vigorous defense.... [B]ut for counsel’s outstanding work in this case and substantial effort over five years, no member of the class would have recovered a penny.... [I]t was an extremely complex and substantial class ... case ... [with an] outstanding result.”

Regarding the work of Berger Montague attorneys Peter R. Kahana and Steven L. Bloch, among other co-class counsel, in **Spencer, et al. v. The Hartford Financial Services Group, Inc., et al.**, in the Order approving the \$72.5 million final settlement of this action, dated September 21, 2010 (No. 3:05-cv-1681, D. Conn.).

Customer/Broker Arbitrations

From **Robert E. Conner**, Public Arbitrator with the National Association of Securities Dealers, Inc.:

“[H]aving participated over the last 17 years in 400 arbitrations and trials in various settings, ... the professionalism and the detail and generally the civility of everyone

involved has been not just a cause for commentary at the end of these proceedings but between ourselves [the arbitration panel] during the course of them, and ... the detail and the intellectual rigor that went into the documents was fully reflective of the effort that was made in general. I wanted to make that known to everyone and to express my particular respect and admiration.”

About the efforts of Berger Montague shareholders Merrill G. Davidoff and Eric L. Cramer, who achieved a \$1.1 million award for their client, in ***Steinman v. LMP Hedge Fund, et al.***, NASD Case No. 98-04152, at Closing Argument, June 13, 2000.

Employment & Unpaid Wages Cases

From **Judge Timothy R. Rice**, United States Magistrate Judge for the U.S. District Court for the Eastern District of Pennsylvania:

Describing Berger Montague as “some of the finest legal representation in the nation,” who are “ethical, talented, and motivated to help hard working men and women.”

Regarding the work of Berger Montague attorney Camille F. Rodriguez in ***Gonzalez v. Veritas Consultant Group, LLC, d/b/a Moravia Health Network***, No. 2:17-cv-1319-TR (E.D. Pa. March 13, 2019).

From **Judge Malachy E. Mannion**, United States District Judge for the U.S. District Court for the Middle District of Pennsylvania:

“At the final approval hearing, class counsel reiterated in detail the arguments set forth in the named plaintiffs’ briefing. ... The court lauded the parties for their extensive work in reaching a settlement the court deemed fair and reasonable.

* * *

“The court is confident that [class counsel] are highly skilled in FLSA collective and hybrid actions, as seen by their dealings with the court and the results achieved in both negotiating and handling the settlement to date.”

Acevedo v. Brightview Landscapes, LLC, No. 3:13-cv-2529, 2017 WL 4354809 (M.D. Pa. Oct. 2, 2017).

From **Judge Joseph F. Bataillon**, United States District Judge for the U.S. District Court for the District of Nebraska:

[P]laintiffs’ counsel succeeded in vindicating important rights. ... The court is familiar with “donning and doffing” cases and based on the court’s experience,

defendant meat packing companies' litigation conduct generally reflects "what can only be described as a deeply-entrenched resistance to changing their compensation practices to comply with the requirements of FLSA." (citation omitted). Plaintiffs' counsel perform a recognized public service in prosecuting these actions as a 'private Attorney General' to protect the rights of underrepresented workers.

The plaintiffs have demonstrated that counsel's services have benefitted the class. ... The fundamental policies of the FLSA were vindicated and the rights of the workers were protected.

Regarding the work of Berger Montague among other co-counsel in ***Morales v. Farmland Foods, Inc.***, No. 8:08-cv-504, 2013 WL 1704722 (D. Neb. Apr. 18, 2013).

From **Judge Jonathan W. Feldman**, United States Magistrate Judge for the U.S. District Court for the Western District of New York:

"The nature of the instant application obliges the Court to make this point clear: In my fifteen years on the bench, no case has been litigated with more skill, tenacity and legal professionalism than this case. The clients, corporate and individual, should be proud of the manner in which their legal interests were brought before and presented to the Court by their lawyers and law firms."

and

"...the Court would be remiss if it did not commend class counsel and all those who worked for firms representing the thousands of current and former employees of Kodak for the outstanding job they did in representing the interests of their clients. For the last several years, lead counsel responsibilities were shared by Shanon Carson Their legal work in an extraordinarily complex case was exemplary, their tireless commitment to seeking justice for their clients was unparalleled and their conduct as officers of the court was beyond reproach."

Employees Committed For Justice v. Eastman Kodak, (W.D.N.Y. 2010) (\$21.4 million settlement).

Other Cases

From **Stephen M. Feiler, Ph.D.**, Director of Judicial Education, Supreme Court of Pennsylvania, Administrative Office of Pennsylvania Courts, Mechanicsburg, PA *on behalf of the Common Pleas Court Judges (trial judges) of Pennsylvania*:

"On behalf of the Supreme Court of Pennsylvania and AOPC's Judicial Education Department, thank you for your extraordinary commitment to the *Dealing with*

Complexities in Civil Litigation symposia. We appreciate the considerable time you spent preparing and delivering this important course across the state. It is no surprise to me that the judges rated this among the best programs they have attended in recent years.”

About the efforts of Berger Montague attorneys Merrill G. Davidoff, Peter Nordberg and David F. Sorensen in planning and presenting a CLE Program to trial judges in the Commonwealth of Pennsylvania.

Our Founding Partner and Attorneys

Founding Partner

David Berger – 1912-2007

David Berger was the founder and the Chairman of Berger Montague. He received his A.B. *cum laude* in 1932 and his LL.B. *cum laude* in 1936, both from the University of Pennsylvania. He was a member of The Order of the Coif and was an editor of the *University of Pennsylvania Law Review*. He had a distinguished scholastic career including being Assistant to Professor Francis H. Bohlen and Dr. William Draper Lewis, Director of the American Law Institute, participating in the drafting of the first Restatement of Torts. He also served as a Special Assistant Dean of the University of Pennsylvania Law School. He was a member of the Board of Overseers of the Law School and Associate Trustee of the University of Pennsylvania. In honor of his many contributions, the Law School established the David Berger Chair of Law for the Improvement of the Administration of Justice.

David Berger was a law clerk for the Pennsylvania Supreme Court. He served as a deputy assistant to Director of Enemy Alien Identification Program of the United States Justice Department during World War II.

Thereafter he was appointed Lt.j.g. in the U.S. Naval Reserve and he served in the South Pacific aboard three aircraft carriers during World War II. He was a survivor of the sinking of the U.S.S. Hornet in the Battle of Santa Cruz, October 26, 1942. After the sinking of the Hornet, Admiral Halsey appointed him a member of his personal staff when the Admiral became Commander of the South Pacific. Mr. Berger was ultimately promoted to Commander. He was awarded the Silver Star and Presidential Unit Citation.

After World War II, he was a law clerk in the United States Court of Appeals. The United States Supreme Court appointed David Berger a member of the committee to draft the Federal Rules of Evidence, the basic evidentiary rules employed in federal courts throughout the United States. David Berger was a fellow of the American College of Trial Lawyers, the International Society of Barristers, and the International Academy of Trial Lawyers, of which he was a former Dean. He was a Life Member of the Judicial Conference of the Third Circuit and the American Law Institute.

A former Chancellor (President) of the Philadelphia Bar Association, he served on numerous committees of the American Bar Association and was a lecturer and author on various legal subjects, particularly in the areas of antitrust, securities litigation, and evidence.

David Berger served as a member of President John F. Kennedy's committee which designed high speed rail lines between Washington and Boston. He drafted and activated legislation in the Congress of the United States which resulted in the use of federal funds to assure the continuance of freight and passenger lines throughout the United States. When the merger of the Pennsylvania Railroad and the New York Central Railroad, which created the Penn Central Transportation Company, crashed into Chapter 11, David Berger was counsel for Penn Central and a proponent of its reorganization. Through this work, Mr. Berger ensured the survival of the major railroads in the Northeastern section of the United States including Penn Central, New Jersey Central, and others.

Mr. Berger's private practice included clients in London, Paris, Dusseldorf, as well as in Philadelphia, Washington, New York City, Florida, and other parts of the United States. David Berger instituted the first class action in the antitrust field, and for over 30 years he and the Berger firm were lead counsel and/or co-lead counsel in countless class actions brought to successful conclusions, including antitrust, securities, toxic tort and other cases. He served as one of the chief counsel in the litigation surrounding the demise of Drexel Burnham Lambert, in which over \$2.6 billion was recovered for various violations of the securities laws during the 1980s. The recoveries benefitted such federal entities as the FDIC and RTC, as well as thousands of victimized investors.

In addition, Mr. Berger was principal counsel in a case regarding the Three Mile Island accident near Harrisburg, Pennsylvania, achieving the first legal recovery of millions of dollars for economic harm caused by the nation's most serious nuclear accident. As part of the award in the case, David Berger established a committee of internationally renowned scientists to determine the effects on human beings of emissions of low-level radiation.

In addition, as lead counsel in *In re Asbestos School Litigation*, he brought about settlement of this long and vigorously fought action spanning over 13 years for an amount in excess of \$200 million.

David Berger was active in Democratic politics. President Clinton appointed David Berger a member of the United States Holocaust Memorial Council, in which capacity he served from 1994-2004. In addition to his having served for seven years as the chief legal officer of Philadelphia, he was a candidate for District Attorney of Philadelphia, and was a Carter delegate in the Convention which nominated President Carter.

Over his lengthy career David Berger was prominent in a great many philanthropic and charitable enterprises some of which are as follows: He was the Chairman of the David Berger Foundation and a long time honorary member of the National Commission of the Anti-Defamation League. He was on the Board of the Jewish Federation of Philadelphia and, at his last place of residence,

Palm Beach, as Honorary Chairman of the American Heart Association, Trustee of the American Cancer Society, a member of the Board of Directors of the American Red Cross, and active in the Jewish Federation of Palm Beach County.

David Berger's principal hobby was tennis, a sport in which he competed for over 60 years. He was a member of the Board of Directors of the International Tennis Hall of Fame and other related organizations for assisting young people in tennis on a world-wide basis.

Firm Chair

Eric L. Cramer – Chairman

Eric L. Cramer is Chairman of Berger Montague and Co-Chair of its antitrust department. He has a national practice in the field of complex litigation, primarily in the area of antitrust class actions. He is currently co-lead counsel in multiple significant antitrust class actions across the country in a variety of industries and is responsible for winning numerous significant settlements for his clients totaling well over \$3 billion. Most recently, he has focused on representing workers claiming that anticompetitive practices have suppressed their pay, including cases on behalf of mixed-martial-arts fighters, healthcare and luxury retail workers, and chicken growers. Further, in late 2021, Mr. Cramer served as one of the main trial counsel in an antitrust class action relating to an alleged international cartel of capacitors' suppliers, which was tried to a jury and settled after nearly three weeks of trial.

In 2020, Law360 named Mr. Cramer a Titan of the Plaintiffs Bar, and Who's Who Legal identified him as a Global Elite Thought Leader, stating that he "comes recommended by peers as a top name for antitrust class action proceedings." In 2019, The National Law Journal awarded Mr. Cramer the Keith Givens Visionary Award, which was developed to honor an outstanding trial lawyer who has moved the industry forward through his or her work within the legal industry ecosystem, demonstrating excellence in all aspects of work from client advocacy to peer education and mentoring. In 2018, he was named Philadelphia antitrust "Lawyer of the Year" by Best Lawyers, and in 2017, he won the American Antitrust Institute's Antitrust Enforcement Award for Outstanding Antitrust Litigation Achievement in Private Law Practice for his work in *Castro v. Sanofi Pasteur Inc.*, No. 11-cv-07178 (D.N.J.). In that case, Mr. Cramer represented a national class of physicians challenging Sanofi Pasteur with anticompetitive conduct in the market for meningitis vaccines, resulting in a settlement of more than \$60 million for the class. He has also been identified as a top tier antitrust lawyer by Chambers & Partners in Pennsylvania and nationally. In 2020, Chambers & Partners observed that Mr. Cramer is "a fantastic lawyer...He has real trial experience and is very capable and super smart." He has been highlighted annually since 2011 by The Legal 500 as one of the country's top lawyers in the field of complex antitrust litigation and repeatedly deemed one of the "Best Lawyers in America," including for 2021.

Mr. Cramer is also a frequent speaker at antitrust and litigation related conferences and a leader of multiple non-profit advocacy groups. He is a past President of the Board of Directors of Public Justice, a national public interest advocacy group and law firm; a former Vice President of the Board of Directors of the American Antitrust Institute; a past President of COSAL (Committee to Support the Antitrust Laws), a leading industry group; and a member of the Advisory Board of the Institute of Consumer Antitrust Studies of the Loyola University Chicago School of Law.

He has written widely in the fields of class certification and antitrust law. Among other writings, Mr. Cramer has co-authored *Antitrust as Antiracism: Antitrust as a Partial Cure for Systemic Racism (and Other Systemic "Isms")*, Vol. 66(3) *The Antitrust Bulletin* 359-393 (2021) and *Antitrust, Class Certification, and the Politics of Procedure*, 17 *George Mason Law Review* 4 (2010), the latter of which was cited by both the First Circuit in *In re Nexium Antitrust Litig.*, 777 F.3d 9, 27 (1st Cir. 2015), and the Third Circuit in *Behrend v. Comcast Corp.*, 655 F.3d 182, 200, n.10 (3d Cir. 2011), *rev'd on other grounds*, 133 S. Ct. 1426 (2013). He has also co-written a number of other pieces, including: *Of Vulnerable Monopolists?: Questionable Innovation in the Standard for Class Certification in Antitrust Cases*, 41 *Rutgers Law Journal* 355 (2009-2010); *A Questionable New Standard for Class Certification in Antitrust Cases*, published in the ABA's *Antitrust Magazine*, Vol. 26, No. 1 (Fall 2011); a Chapter of American Antitrust Institute's *Private International Enforcement Handbook* (2010), entitled "Who May Pursue a Private Claim?," and a chapter of the American Bar Association's *Pharmaceutical Industry Handbook* (July 2009), entitled "Assessing Market Power in the Prescription Pharmaceutical Industry."

Mr. Cramer is a *summa cum laude* graduate of Princeton University (1989), where he earned membership in Phi Beta Kappa. He graduated *cum laude* from Harvard Law School with a J.D. in 1993.

Executive Shareholders

Sherrie R. Savett – Executive Shareholder, Chair *Emeritus*

Sherrie R. Savett, Chair *Emeritus* of the Firm, Co-Chair of the Securities Litigation Department and *Qui Tam*/False Claims Act Department, and member of the Firm's Management Committee, has practiced in the areas of securities litigation, class actions, and commercial litigation since 1975.

Ms. Savett serves or has served as lead or co-lead counsel or as a member of the executive committee in a large number of important securities and consumer class actions in federal and state courts across the country, including:

- ***In re Alcatel Alsthom Securities Litigation:*** The firm, as co-lead counsel, obtained a class settlement for investors of \$75 million cash. (MDL Docket No. 1263 (PNB) (E.D. Tex.));
- ***In re CIGNA Corp. Securities Litigation:*** The firm, as co-lead counsel, obtained a settlement of \$93 million for the benefit of the class. (Master File No. 2:02-cv-8088 (E.D. Pa.));
- ***In re Fleming Companies, Inc. Securities Litigation:*** The firm, as lead counsel, obtained a class settlement of \$94 million for the benefit of the class. (No. 5-03-MD-1530 (TJW) (E.D. Tex.));
- ***In re KLA Tencor Securities Litigation:*** The firm, as a member of Plaintiffs' Counsel's Executive Committee, obtained a cash settlement of \$65 million in an action on behalf of investors against KLA-Tencor and certain of its officers and directors. (No. 06-cv-04065 (N.D. Cal.));
- ***Medaphis/Deloitte & Touche*** (class settlement of \$96.5 million) (No. 1:96-CV-2088-FMH (N.D. GA));

- ***In re Rite Aid Corp. Securities Litigation:*** The firm, as co-lead counsel, obtained settlements totaling \$334 million against Rite Aid's outside accounting firm and certain of the company's former officers. (No. 99-cv-1349) (E.D. Pa.);
- ***In re Sotheby's Holding, Inc. Securities Litigation:*** The firm, as lead counsel, obtained a \$70 million settlement, of which \$30 million was contributed, personally, by an individual defendant (No. 00-cv-1041 (DLC) (S.D.N.Y.));
- ***In re Waste Management, Inc. Securities Litigation:*** In 1999, the firm, as co-lead counsel, obtained a class settlement for investors of \$220 million cash, which included a settlement against Waste Management's outside accountants. (No. 97-cv-7709 (N.D. Ill.)); and
- ***In re Xcel Inc. Securities, Derivative & "ERISA" Litigation:*** The firm, as co-lead counsel in the securities actions, obtained a cash settlement of \$80 million on behalf of investors against Xcel Energy and certain of its officers and directors. (No. 02-cv-2677 (DSD/FLN) (D. Minn.)).

Ms. Savett has helped establish several significant precedents. Among them is the holding (the first ever in a federal appellate court) that municipalities are subject to the anti-fraud provisions of SEC Rule 10b-5 under § 10(b) of the Securities Exchange Act of 1934, and that municipalities that issue bonds are not acting as an arm of the state and therefore are not entitled to immunity from suit in the federal courts under the Eleventh Amendment. *Sonnenfeld v. City and County of Denver*, 100 F.3d 744 (10th Cir. 1996).

In the *U.S. Bioscience* securities class action, a biotechnology case where critical discovery was needed from the federal Food and Drug Administration, the court ruled that the FDA may not automatically assert its administrative privilege to block a subpoena and may be subject to discovery depending on the facts of the case. *In re U.S. Bioscience Secur. Litig.*, 150 F.R.D. 80 (E.D. Pa. 1993).

In the *CIGNA Corp. Securities Litigation*, the Court denied defendants' motion for summary judgment, holding that a plaintiff has a right to recover for losses on shares held at the time of a corrective disclosure and his gains on a stock should not offset his losses in determining legally recoverable damages. *In re CIGNA Corp. Securities Litigation*, 459 F. Supp. 2d 338 (E.D. Pa. 2006).

Additionally, Ms. Savett has become increasingly well-known in the area of consumer litigation, achieving a groundbreaking \$24 million settlement in 2008 in the *Menu Foods* case brought by pet owners against manufacturers of allegedly contaminated pet food. (*In re Pet Food Products Liability Litigation*, MDL Docket No. 1850 (D.N.J. 2007).

In the data breach area, she was co-lead counsel in *In re TJX Retail Securities Breach Litigation*, MDL Docket No. 1838 (D. Mass.), the first very large data breach case where hackers stole personal information from 45 million consumers. The settlement, which became the template for future data breach cases, consisted of providing identity theft insurance to those whose social

security or driver's license numbers were stolen, a cash fund for actual damages and time spent mitigating the situation, and injunctive relief.

Ms. Savett also litigated a case on behalf of the City of Philadelphia titled *City of Philadelphia v. Wells Fargo & Co.*, No. 17-cv-02203 (E.D. Pa.), involving alleged violations of the Fair Housing Act. The case was resolved in 2019 with a settlement providing \$10 million to go to citizens of Philadelphia for down payment assistance, to local agencies to assist homeowners in foreclosure, and for greening and cleaning foreclosed properties in Philadelphia which blight neighborhoods.

In the past decade, she has also actively worked in the False Claims Act arena. She was part of the team that litigated over more than a decade and settled the Average Wholesale Price *qui tam* cases, which collectively settled for more than \$1 billion.

Ms. Savett speaks and writes frequently on securities litigation, consumer class actions and False Claims Act litigation. She is a lecturer and panelist at the University of Pennsylvania Law School on the subjects of Securities Law and the False Claims Act/*Qui Tam* practice from the whistleblower's perspective. She has also lectured at the Wharton School of the University of Pennsylvania and at the Stanford Law School on prosecuting shareholder class actions and on False Claims Act Litigation. She is frequently invited to present and serve as a panelist in American Bar Association, American Law Institute/American Bar Association and Practising Law Institute (PLI) conferences on securities class action litigation and the use of class actions in consumer litigation. She has been a presenter and panelist at PLI's Securities Litigation and Enforcement Institute annually from 1995 to 2010. She has also spoken at major institutional investor and insurance industry conferences, and DRI – the Voice of the Defense Bar. In February 2009, she was a member of a six-person panel who presented an analysis of the current state of securities litigation before more than 1,000 underwriters and insurance executives at the PLUS (Professional Liability Underwriting Society) Conference in New York City. She has presented at the Cyber-Risk Conference in 2009, as well as the PLUS Conference in Chicago on November 16, 2009 on the subject of litigation involving security breaches and theft of personal information.

Most recently, in April 2019, she spoke as a panelist at PLI's Securities Litigation 2019: From Investigation to Trial program. Her panel was titled "Commencement of a Civil Action: Filing the Complaint, Preparing the Motion to Dismiss, Coordinating Multiple Securities Litigation Actions." Ms. Savett also co-authored an article for the program that was published in PLI's *Corporate Law and Practice Court Handbook Series*. The article is titled "After the Fall—A Plaintiff's Perspective."

In 2015 and 2016, she served as a panelist in American Law Institute programs held in New York City called "Securities and Shareholder Litigation: Cutting-Edge Developments, Planning and Strategy." Ms. Savett also spoke at the 2013 ABA Litigation Section Annual Conference in Chicago on two panels. One program on securities litigation was entitled "The Good, The Bad, and The Ugly: Ethical Issues in Class Action Settlements and Opt Outs." The other program focused on consumer class actions in the real estate area and was entitled "The Foreclosure Crisis Puzzle: Navigating the Changing Landscape of Foreclosure."

In May 2007, Ms. Savett spoke in Rome, Italy at the conference presented by the Litigation Committee of the Dispute Resolution Section of the International Bar Association and the Section of International Law of the American Bar Association on class certification. Ms. Savett participated in a mock hearing before a United States Court on whether to certify a worldwide class action that includes large numbers of European class members.

Ms. Savett has written numerous articles on securities and complex litigation issues in professional publications, including:

- "After the Fall – A Plaintiff's Perspective," with Phyllis M. Parker, *PLI Corporate Law and Practice Course Handbook Series No. B-2475*, pg. 73-105, April 2019
- "Plaintiffs' Vision of Securities Litigation: Current Trends and Strategies," 1762 *PLL* October 2009
- "Primary Liability of 'Secondary' Actors Under the PSLRA," I *Securities Litigation Report*, (Glasser) November 2004
- "Securities Class Actions Since the 1995 Reform Act: A Plaintiffs Perspective," 1442 *PLI/Corp. 13*, September – October 2004
- "Securities Class Actions Since the 1995 Reform Act: A Plaintiffs Perspective," SJ084 ALI-ABA 399, May 13-14, 2004
- "The 'Indispensable Tool' of Shareholder Suits," *Directors & Boards*, Vol. 28, February 18, 2004
- "Plaintiffs Perspective on How to Obtain Class Certification in Federal Court in a Non-Federal Question Case," 679 *PLI*, August 2002
- "Hurdles in Securities Class Actions: The Impact of Sarbanes-Oxley From a Plaintiffs Perspective," 9 *Securities Litigation and Regulation Reporter* (Andrews), December 23, 2003
- "Securities Class Actions Since the 1995 Reform Act: A Plaintiffs Perspective," SG091 ALI-ABA, May 2-3, 2002
- "Securities Class Actions Since the 1995 Reform Act: A Plaintiffs Perspective," SF86 ALI-ABA 1023, May 10, 2001
- "Greetings From the Plaintiffs' Class Action Bar: We'll be Watching," SE082 ALI-ABA739, May 11, 2000
- "Preventing Financial Fraud," B0-00E3 *PLJB0-00E3* April – May 1999
- "Shareholders Class Actions in the Post Reform Act Era," SD79 ALI-ABA 893, April 30, 1999
- "What to Plead and How to Plead the Defendant's State of Mind in a Federal Securities Class Action," with Arthur Stock, *PLI*, ALI/ABA 7239, November 1998
- "The Merits Matter Most: Observations on a Changing Landscape Under the Private Securities Litigation Reform Act of 1995," 39 *Arizona Law Review* 525, 1997
- "Everything David Needs to Know to Battle Goliath," ABA Tort & Insurance Practice Section, *The Brief*, Vol. 20, No.3, Spring 1991
- "The Derivative Action: An Important Shareholder Vehicle for Insuring Corporate Accountability in Jeopardy," *PLIH4-0528*, September 1, 1987

- “Prosecution of Derivative Actions: A Plaintiffs Perspective,” *PLIH4-5003*, September 1, 1986

Ms. Savett is widely recognized as a leading litigator and a top female leader in the profession by local and national legal rating organizations.

In 2019, *The Legal Intelligencer* named Ms. Savett a "Distinguished Leader," and in 2018 she was named to the *Philadelphia Business Journal's* 2018 Best of the Bar: Philadelphia's Top Lawyers.

The Legal Intelligencer and *Pennsylvania Law Weekly* named her one of the “56 Women Leaders in the Profession” in 2004.

In 2003-2005, 2007-2013, and 2015-2016, Berger Montague was named to the *National Law Journal's* “Hot List” of 12-20 law firms nationally “who specialize in plaintiffs’ side litigation and have excelled in their achievements.” The firm is on the *National Law Journal's* “Hall of Fame,” and Ms. Savett’s achievements were mentioned in many of these awards.

Ms. Savett was named a “Pennsylvania Top 50 Female Super Lawyer” and/or a “Pennsylvania Super Lawyer” from 2004 through 2021 by Thomson Reuters after an extensive nomination and polling process among Pennsylvania lawyers.

In 2006 and 2007, she was named one of the “500 Leading Litigators” and “500 Leading Plaintiffs’ Litigators” in the United States by *Lawdragon*. In 2008, Ms. Savett was named as one of the “500 Leading Lawyers in America.” Also in 2008, she was named one of 25 “Women of the Year” in Pennsylvania by *The Legal Intelligencer* and *Pennsylvania Law Weekly*, which stated on May 19, 2008 in the *Women in the Profession* in *The Legal Intelligencer* that she “has been a prominent figure nationally in securities class actions for years, and some of her recent cases have only raised her stature.” In June 2008, Ms. Savett was named by *Lawdragon* as one of the “100 Lawyers You Need to Know in Securities Litigation.”

Unquestionably, it is because of Ms. Savett, who for decades has been in the top leadership of the firm, that the firm has a remarkably high proportion of women lawyers and shareholders.

Ms. Savett has aggressively sought to hire women, without regard to age or whether they are “right out of law school.” Several of the women who have children are able to continue working at the firm because Ms. Savett has instituted a policy of flexible work time and fosters an atmosphere of cooperation, teamwork and mutual respect. As a result, the women attorneys stay on and have long and productive careers while still maintaining a balanced life. Ms. Savett has a personal understanding of the challenges and satisfactions that women experience in practicing law while raising a family. Ms. Savett has three children and five grandchildren. One of her daughters and her daughter-in-law are lawyers.

Ms. Savett has taught those around her more than good lawyering. She places great emphasis in her own life on devotion to family, community service and involvement in charitable

organizations. She teaches others by her example and her obvious interest in their efforts and achievements.

Ms. Savett is a well-known leader of the Philadelphia legal, business, cultural and Jewish community. She is an exemplary citizen who spends endless hours of her after-work time helping others in the community.

From 2011 – 2014, Ms. Savett served as President and Board Chair of the Jewish Federation of Greater Philadelphia (JFGP), a community of over 215,000 Jewish people. She is only the third woman to serve as the President, the top lay leader of the Federation, in the 117 years of its existence.

Ms. Savett also serves on the Board of the National Liberty Museum, The National Museum of American Jewish History, and the local and national boards of American Associates of Ben Gurion University of the Negev. She had previously served as Chairperson of the Southeastern Pennsylvania State of Israel Bonds Campaign and has served as a member of the National Cabinet of State of Israel Bonds. In 2005, Ms. Savett received The Spirit of Jerusalem Medallion, the State of Israel Bonds' highest honor.

Ms. Savett has used her positions of leadership in the community to identify and help promote women as volunteer leaders. Ms. Savett has selected a few worthy causes to which she tirelessly dedicates herself. According to leaders of The Jewish Federation of Greater Philadelphia, Ms. Savett is viewed by many women in the philanthropic world as a role model.

Ms. Savett earned her J.D. from the University of Pennsylvania Law School and a B.A. *summa cum laude* from the University of Pennsylvania. She is a member of Phi Beta Kappa.

Ms. Savett has three married children, four grandsons, and two granddaughters. She enjoys tennis, biking, physical training, travel, and collecting art, especially glass and sculpture.

Daniel Berger – Executive Shareholder

Daniel Berger graduated with honors from Princeton University and Columbia Law School, where he was a Harlan Fiske Stone academic scholar. He is a senior member and Executive Shareholder. Over the last two decades, he has been involved in complicated commercial litigation including class action securities, antitrust, consumer protection and bankruptcy cases. In addition, he has prosecuted important environmental, mass tort and civil rights cases during this period. He has led the Firm's practice involving improprieties in the marketing of prescription drugs and the abuse of marketing exclusivities in the pharmaceutical industry, including handling landmark cases involving the suppression of generic competition in the pharmaceutical industry. For this work, he has been recognized by the *Law360* publication as a "titan" of the plaintiffs' Bar ("Titan of the Plaintiffs Bar: Daniel Berger" *Law360*, September 23, 2014).

In the civil rights area, he has been counsel in informed consent cases involving biomedical research and human experimentation by federal and state governmental entities. He also leads the firm's representation of states and other public bodies and agencies.

Mr. Berger has frequently represented public institutional investors in securities litigation, including representing the state pension funds of Pennsylvania, Ohio and New Jersey in both individual and class action litigation. He also represents Pennsylvania and New Jersey on important environmental litigation involving contamination of groundwater by gasoline manufacturers and marketers.

Mr. Berger has a background in the study of economics, having done graduate level work in applied microeconomics and macroeconomic theory, the business cycle, and economic history. He has published law review articles in the *Yale Law Journal*, the *Duke University Journal of Law and Contemporary Problems*, the *University of San Francisco Law Review* and the *New York Law School Law Review*. Mr. Berger is also an author and journalist who has been published in *The Nation* magazine, reviewed books for *The Philadelphia Inquirer* and authored a number of political blogs, including in *The Huffington Post* and the Roosevelt Institute's *New Deal 2.0*. He has also appeared on MSNBC as a political commentator.

Mr. Berger has been active in city government in Philadelphia and was a member of the Mayor's Cultural Advisory Council, advising the Mayor of Philadelphia on arts policy, and the Philadelphia Cultural Fund, which was responsible for all City grants to arts organizations. Mr. Berger was also a member of the Pennsylvania Humanities Council, one of the State organizations through which the NEA makes grants. Mr. Berger also serves on the board of the Wilma Theater, Philadelphia's pre-eminent theater for new plays and playwrights.

Shanon J. Carson – Executive Shareholder

Shanon J. Carson is an Executive Shareholder of the firm. He Co-Chairs the Employment & Unpaid Wages, Consumer Protection, Defective Products, and Defective Drugs and Medical Devices Departments and is a member of the Firm's Commercial Litigation, Employee Benefits & ERISA, Environment & Public Health, Insurance Fraud, Predatory Lending and Borrowers' Rights, and Technology, Privacy & Data Breach Departments.

Mr. Carson has achieved the highest peer-review rating, "AV," in Martindale-Hubbell, and has received honors and awards from numerous publications. In 2009, Mr. Carson was selected as one of 30 "Lawyers on the Fast Track" in Pennsylvania under the age of 40. In both 2015 and 2016, Mr. Carson was selected as one of the top 100 lawyers in Pennsylvania, as reported by Thomson Reuters. In 2018, Mr. Carson was named to the *Philadelphia Business Journal's* "2018 Best of the Bar: Philadelphia's Top Lawyers."

Mr. Carson is often retained to represent plaintiffs in employment cases, wage and hour cases for minimum wage violations and unpaid overtime, ERISA cases, consumer cases, insurance cases, construction cases, automobile defect cases, defective drug and medical device cases,

product liability cases, breach of contract cases, invasion of privacy cases, false advertising cases, excessive fee cases, and cases involving the violation of state and federal statutes. Mr. Carson represents plaintiffs in all types of litigation including class actions, collective actions, multiple plaintiff litigations, and single plaintiff litigation. Mr. Carson is regularly appointed by federal courts to serve as lead counsel and on executive committees in class actions and mass torts.

Mr. Carson is frequently asked to speak at continuing legal education seminars and other engagements and is active in nonprofit and professional organizations. Mr. Carson currently serves on the Board of Directors of the Philadelphia Trial Lawyers Association (PTLA) and as a Co-Chair of the PTLA Class Action/Mass Tort Committee. Mr. Carson is also a member of the American Association for Justice, the American Bar Foundation, Litigation Counsel of America, the National Trial Lawyers - Top 100, and the Pennsylvania Association for Justice.

While attending the Dickinson School of Law of the Pennsylvania State University, Mr. Carson was senior editor of the Dickinson Law Review and clerked for a U.S. District Court Judge. Mr. Carson currently serves on the Board of Trustees of the Dickinson School of Law of the Pennsylvania State University.

Michael Dell'Angelo – Executive Shareholder

Michael Dell'Angelo is an Executive Shareholder in the Antitrust, Commercial Litigation, Commodities & Financial Instruments practice groups, and Co-Chair of the Securities department. He serves as co-lead counsel in a variety of complex antitrust cases, including *Le, et al. v. Zuffa, LLC*, No. 15-1045 (D. Nev.) (alleging the Ultimate Fighting Championship (“UFC”) obtained illegal monopoly power of the market for Mixed Martial Arts promotions and suppressed the compensation of MMA fighters).

Mr. Dell'Angelo is responsible for winning numerous significant settlements for his clients and class members. Mr. Dell'Angelo helped to reach settlements totaling more than \$190 million in the multidistrict litigation *In re Domestic Drywall Antitrust Litig.*, No. 13-md-2437 (E.D. Pa.). There, in granting final approval to the last settlement, the court observed about Mr. Dell'Angelo and his colleagues that “Plaintiffs’ counsel are experienced antitrust lawyers who have been working in this field of law for many years and have brought with them a sophisticated and highly professional approach to gathering persuasive evidence on the topic of price-fixing.” *In re Domestic Drywall Antitrust Litig.*, No. 13-md-2437, 2018 WL 3439454, at *18 (E.D. Pa. July 17, 2018). “[I]t bears repeating,” the court emphasized, “that the result attained is directly attributable to having highly skilled and experienced lawyers represent the class in these cases.” *Id.*

Mr. Dell'Angelo also serves or has recently served as co-lead counsel or class counsel in numerous cases alleging price-fixing or other wrongdoing affecting a variety of financial instruments, including *In re Commodity Exchange, Inc., Gold Futures and Options Trading Litig.*, 1:14-MD-2548-VEC (S.D.N.Y) (\$152 million settlements); *In re Platinum and Palladium Antitrust Litig.*, No. 14-cv-09391-GHW (S.D.N.Y.); *Contant, et al. v. Bank of America Corp., et al.*, 1:17-cv-

03139-LGS (S.D.N.Y.) (\$23.6 million in settlements); In re Libor-Based Financial Instruments Antitrust Litig., No. 11-md-2262 (S.D.N.Y.) (\$187 million in settlements pending final approval); Alaska Elec. Pension Fund, et al. v. Bank of Am. Corp., et al., No. 14 Civ. 7126-JMF (S.D.N.Y.) (\$504.5 million in settlements); In re Crude Oil Commodity Futures Litig., No. 11-cv-3600 (S.D.N.Y.); and In re London Silver Fixing, Ltd. Antitrust Litig., No. 14-md-2573 (S.D.N.Y.) (\$38 million partial settlement).

Mr. Dell'Angelo also serves as lead counsel in numerous individual antitrust cases on behalf of purchasers of rail freight services from the four major rail carriers in the United States.

The National Law Journal featured Mr. Dell'Angelo in its profile of Berger Montague for a special annual report entitled "Plaintiffs' Hot List." The National Law Journal's Hot List identifies the top plaintiff practices in the country. The Hot List profile focused on Mr. Dell'Angelo's role in the MF Global litigation (In re MF Global Holding Ltd. Inv. Litig., No. 12-MD-2338-VM (S.D.N.Y.)). In MF Global, Mr. Dell'Angelo represented former commodity account holders seeking to recover approximately \$1.6 billion of secured customer funds after the highly publicized collapse of MF Global, a major commodities brokerage. At the outset of this high-risk litigation, the odds appeared grim: MF Global had declared bankruptcy, leaving the corporate officers, a bank, and a commodity exchange as the only prospect for the recovery of class's misappropriated funds. Nonetheless, four years later, a result few would have believed possible was achieved. Through a series of settlements, the former commodity account holders recovered more than 100 percent of their missing funds, totaling over \$1.6 billion.

Mr. Dell'Angelo has been recognized consistently as a Pennsylvania Super Lawyer, a distinction conferred upon him annually since 2007. He is regularly invited to speak at Continuing Legal Education (CLE) and other seminars and conferences, both locally and abroad. In response to his recent CLE, "How to Deal with the Rambo Litigator," Mr. Dell'Angelo was singled out as "One of the best CLE speakers [attendees] have had the pleasure to see."

E. Michelle Drake – Executive Shareholder

E. Michelle Drake is an Executive Shareholder in the Firm's Minneapolis office. With career settlements and verdicts valued at more than \$150 million, Michelle has had great success in a wide variety of cases.

Michelle focuses her practice primarily on consumer protection, improper credit reporting, and financial services class actions. Michelle is empathetic towards her clients and unyielding in her desire to win. Possessing a rare combination of an elite academic pedigree and real-world trial skills, Michelle has successfully gone toe-to-toe with some of the world's most powerful companies.

Michelle helped achieve one of the largest class action settlements in a case involving improper mortgage servicing practices associated with force-placed insurance, resulting in a settlement valued at \$110 million for a nationwide class of borrowers who were improperly force-placed with

overpriced insurance. Michelle also served as liaison counsel and part of the Plaintiffs' Steering Committee on behalf of consumers harmed in the Target data breach, a case she helped successfully resolve on behalf of over ninety million consumers whose data was affected by the breach. In 2015, Michelle resolved a federal class action on behalf of a group of adult entertainers in New York for \$15 million. Most recently, Michelle has been successful in litigating numerous cases protecting consumers' federal privacy rights under the Fair Credit Reporting Act, securing settlements valued at over \$10 million on behalf of tens of thousands of consumers harmed by improper background checks and inaccurate credit reports in the last two years alone.

Michelle was admitted to the bar in 2001 and has since served as lead class counsel in over fifty class and collective actions alleging violations of the Fair Credit Reporting Act, the Fair Debt Collection Practices Act, the Fair Labor Standards Act, various states' unfair and deceptive trade practices acts, breach of contract and numerous other pro-consumer and pro-employee causes of action.

Michelle serves on the Board of the National Association of Consumer Advocates, is a member of the Partner's Council of the National Consumer Law Center, and is an At-Large Council Member for the Consumer Litigation Section for the Minnesota State Bar Association. She was named as a Super Lawyer in 2013-2018 and was named as a Rising Star prior to that. Michelle was also appointed to the Federal Practice Committee in 2010 by the United States District Court for the District of Minnesota. She has been quoted in the New York Times and the National Law Journal, and her cases were named as "Lawsuits of the Year" by Minnesota Law & Politics in both 2008 and 2009.

Michelle began her practice of law by defending high stakes criminal cases as a public defender in Atlanta. Michelle has never lost her desire to litigate on the side of the "little guy."

David F. Sorensen – Executive Shareholder

David Sorensen is an Executive Shareholder and Co-Chair of the Firm's antitrust department. He graduated from Duke University (A.B. 1983) and Yale Law School (J.D. 1989), and clerked for the Hon. Norma L. Shapiro (E.D. Pa.). He concentrates his practice on antitrust and environmental class actions.

Mr. Sorensen co-tried *Cook v. Rockwell Int'l Corp.*, No. 90-181 (D. Colo.) and received, along with the entire trial team, the "Trial Lawyer of the Year" award in 2009 from the Public Justice Foundation for their work on the case, which resulted in a jury verdict of \$554 million in February 2006, after a four-month trial, on behalf of thousands of property owners near the former Rocky Flats nuclear weapons plant located outside Denver, Colorado. The jury verdict was then the largest in Colorado history, and was the first time a jury has awarded damages to property owners living near one of the nation's nuclear weapons sites. In 2008, after extensive post-trial motions, the District Court entered a \$926 million judgment for the plaintiffs. The jury verdict in the case was vacated on appeal in 2010. In 2015, on a second trip to the Tenth Circuit Court of Appeals,

Plaintiffs secured a victory with the case being sent back to the district court. In 2016, the parties reached a \$375 million settlement, which received final approval in 2017.

Mr. Sorensen played a major role in the Firm's representation of the State of Connecticut in *State of Connecticut v. Philip Morris, Inc., et al.*, in which Connecticut recovered approximately \$3.6 billion (excluding interest) from certain manufacturers of tobacco products. And he served as co-lead class counsel in *Johnson v. AzHHA, et al.*, No. 07-1292 (D. Ariz.), representing a class of temporary nursing personnel who had been underpaid because of an alleged conspiracy among Arizona hospitals. The case settled for \$24 million.

Mr. Sorensen also has played a leading role in numerous antitrust cases representing direct purchasers of prescription drugs. Many of these cases have alleged that pharmaceutical manufacturers have wrongfully kept less expensive generic drugs off the market, in violation of the antitrust laws. Many of these cases have resulted in substantial cash settlements, including *In re: Namenda Direct Purchaser Antitrust Litigation*, (S.D.N.Y.) (\$750 million settlement – largest single-defendant settlement ever for a case alleging delayed generic competition); *King Drug Co. v. Cephalon, Inc.*, (E.D. Pa.) (\$512 million partial settlement); *In re: Aggrenox Antitrust Litigation* (\$146 million settlement); *In re Loestrin 24 Fe Antitrust Litigation* (\$120 million); *In re: K-Dur Antitrust Litigation* (\$60.2 million); *In re: Prandin Direct Purchaser Antitrust Litigation* (\$19 million); *In re: Doryx Antitrust Litigation* (\$15 million); *In re: Skelaxin Antitrust Litigation* (\$73 million); *In re: Wellbutrin XL Antitrust Litigation* (\$37.50 million); *In re: Oxycontin Antitrust Litigation* (\$16 million); *In re: DDAVP Direct Purchaser Antitrust Litigation* (\$20.25 million settlement following precedent-setting victory in the Second Circuit, which Mr. Sorensen argued, see 585 F.3d 677 (2d Cir. 2009)); *In re: Nifedipine Antitrust Litigation* (\$35 million); *In re: Terazosin Hydrochloride Antitrust Litigation*, MDL 1317 (S.D. Fla.) (\$74.5 million); and *In re: Remeron Antitrust Litigation* (\$75 million). Mr. Sorensen is serving as co-lead counsel or on the executive committee of numerous similar, pending cases.

In 2017, the American Antitrust Institute presented its Antitrust Enforcement Award to Mr. Sorensen and others for their work on the *K-Dur* case. In 2019, Mr. Sorensen and others were recognized again by the AAI for their work on the *King Drug* case, being awarded the Outstanding Antitrust Litigation Achievement in Private Law Practice. Mr. Sorensen and his team received the same award in 2020 for their work on the *Namenda* case. Also in 2020, *Law360* named Mr. Sorensen a Competition MVP of the Year.

Shareholders

John G. Albanese – Shareholder

John Albanese is a Shareholder in the Minneapolis office. Mr. Albanese concentrates his practice on consumer protection with a focus on Fair Credit Reporting Act violations related to criminal background checks. Mr. Albanese has also prosecuted class actions related to illegal online lending, unfair debt collection, privacy breaches, and other consumer law issues. Mr. Albanese is regularly invited to speak on consumer law and litigation issues. Mr. Albanese has obtained

favorable decisions for consumers in state and federal courts all over the country. He also frequently represents consumer advocacy groups as *amici curiae* at the appellate level.

Mr. Albanese is a graduate of Columbia Law School and Georgetown University. At Columbia, he was a managing editor of the Columbia Law Review and was elected to speak at graduation by his classmates. Mr. Albanese clerked for Magistrate Judge Geraldine Brown in the Northern District of Illinois.

Zachary Caplan – Shareholder

Zach Caplan is a Shareholder at Berger Montague. Recently, Zach was in service with the U.S. Department of Justice Antitrust Division in Washington, DC. While at the Justice Department, he led teams investigating anticompetitive conduct in the healthcare space, engaged with senior Division leadership on a statement of interest arguing that the American Red Cross is subject to antitrust law, and assisted with fast-paced monopolization litigation against a major tech company. He also served on the Division-wide Discovery and Technology Working Group where he contributed to guidelines for all attorneys on cutting-edge issues such as technology assisted review and ephemeral messaging. Prior to his work at the Justice Department, Zach was an attorney in the Antitrust Department at Berger Montague for a decade.

Joy P. Clairmont – Shareholder

Joy Clairmont is a Shareholder in the Whistleblower, *Qui Tam* & False Claims Act Group, which has recovered more than \$3 billion for federal and state governments, as well as over \$500 million for the firm's whistleblower clients. Ms. Clairmont also has experience practicing in the area of securities fraud litigation.

Ms. Clairmont has been investigating and litigating whistleblower cases for over fifteen years and has successfully represented whistleblower clients in federal and state courts throughout the United States. On behalf of her whistleblower clients, Ms. Clairmont has pursued fraud cases involving a diverse array of companies: behavioral health facilities, a national retail pharmacy chain, a research institution, pharmaceutical manufacturers, skilled nursing facilities, a national dental chain, mortgage lenders, hospitals and medical device manufacturers.

Most notably, Ms. Clairmont has participated in several significant and groundbreaking cases involving fraudulent drug pricing:

United States ex rel. Streck v. AstraZeneca, LP, et al., C.A. No. 08-5135 (E.D. Pa.): a Medicaid rebate fraud case which settled in 2015 for a total of \$55.5 million against three pharmaceutical manufacturers, AstraZeneca, Cephalon, and Biogen. The case alleged that the defendants did not properly account for millions of dollars of payments to wholesalers for drug distribution and other services. As a result, the defendants underpaid the government in rebates owed under the Medicaid Drug Rebate Program.

United States ex rel. Kieff and LaCorte v. Wyeth and Pfizer, Inc., Nos. 03-12366 and 06-11724-DPW (D. Mass.): a Medicaid rebate fraud case involving Wyeth's acid-reflux drug, Protonix, which settled for \$784.6 million in April 2016.

"AWP" Cases: a series of cases in federal and state courts against many of the largest pharmaceutical manufacturers, including Bristol-Myers Squibb, Boehringer Ingelheim, and GlaxoSmithKline, for defrauding the government through false and inflated price reports for their drugs, which resulted in more than \$2 billion in recoveries for the government.

Earlier in her career, Ms. Clairmont gained experience litigating securities fraud class actions including, most notably, *In Re Sunbeam Securities Litigation*, a class action which led to the recovery of over \$142 million for the class of plaintiffs in 2002.

Ms. Clairmont graduated in 1995 with a B.A. *cum laude* from George Washington University and in 1998 with a J.D. from George Washington University Law School.

Caitlin G. Coslett – Shareholder

Caitlin G. Coslett is a Shareholder and Co-Chair of the Firm's Antitrust Department. She also serves on the Firm's Diversity, Equity, and Inclusion Task Force and as the Work Assignment Coordinator. Ms. Coslett concentrates her practice on complex litigation, including antitrust and mass tort litigation.

Ms. Coslett represents classes of direct purchasers of pharmaceutical drugs who allege that drug manufacturers have violated federal antitrust law by wrongfully keeping less-expensive generic drugs off the market and/or by wrongfully impeding generic competition. Her work on generic suppression cases has contributed to significant settlements totaling hundreds of millions of dollars, including in the cases of *In re Solodyn (Minocycline Hydrochloride) Antitrust Litigation* (for which Ms. Coslett served as Co-Lead Counsel), *In re Lidoderm Antitrust Litigation*, and *In re Skelaxin (Metaxalone) Antitrust Litigation*. Ms. Coslett is currently litigating several similar antitrust pharmaceutical cases, such as *In re Effexor XR Antitrust Litigation*, *In re Bystolic Antitrust Litigation*, *In re Intuniv Antitrust Litigation*, *In re Lamictal Antitrust Litigation*, *In re Novartis and Par Antitrust Litigation*, *In re Opana ER Antitrust Litigation*, and *In re Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litigation*. She was honored for "Outstanding Antitrust Litigation Achievement by a Young Lawyer" for her work in *In re Lidoderm Antitrust Litigation*.

Ms. Coslett's experience litigating antitrust class actions also includes *In re CRT Antitrust Litigation*, *In re Domestic Drywall Antitrust Litigation*, *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, *In re Steel Antitrust Litigation*, and *In re Urethane [Polyether Polyols] Antitrust Litigation*.

Ms. Coslett also played a significant role in the post-trial litigation in *Cook v. Rockwell International Corporation*, a mass tort class action brought on behalf of thousands of property owners near the Rocky Flats nuclear plant in Colorado. The case settled for \$375 million following a successful appeal to the Tenth Circuit and, in ruling for the plaintiffs on appeal, then-Judge Neil Gorsuch

(who is now a Supreme Court Justice) praised Class Counsel's successful "judicial jiu jitsu" in litigating the case through the second appeal.

Ms. Coslett was named a "Next Generation Lawyer" by The Legal 500 United States 2019 in the Civil Litigation/Class Actions: Plaintiff category and was selected as a Rising Star by Super Lawyers every year from 2014 – 2021. She has served as pro bono counsel for clients referred by the AIDS Law Project of Pennsylvania and Philly VIP and is a member of the National LGBT Bar Association.

A Philadelphia native, Ms. Coslett graduated magna cum laude from Haverford College with a B.S. in mathematics and economics and graduated cum laude from New York University School of Law. At NYU Law, Ms. Coslett was a Lederman/Milbank Fellow in Law and Economics and an articles selection editor for the NYU Review of Law and Social Change. Prior to law school, she was an economics research assistant at the Federal Reserve Board in Washington, D.C. Ms. Coslett was formerly one of the top 75 rated female chess players in the U.S.

Andrew C. Curley – Shareholder

Andrew C. Curley is a Shareholder in the Antitrust practice group. He concentrates his practice in the area of complex antitrust litigation.

Mr. Curley served as Co-Lead Class Counsel on behalf of a class of independent truck stops and other retail merchants in *Marchbanks Truck Service, Inc. v. Comdata Network, Inc.*, Case No. 07-1078 (E.D. Pa.). The *Marchbanks* litigation settled in January 2014 for \$130 million and significant prospective relief in the form of, among other things, meaningful and enforceable commitments by the largest over-the-road trucker fleet card issuer in the United States to modify or not to enforce those portions of its merchant services agreements that plaintiffs challenged as anticompetitive, and that an expert economist has determined to be worth an additional \$260 million to \$491 million (bringing the total value of the settlement to between \$390 and \$621 million).

Mr. Curley is also involved in a number of antitrust cases representing direct purchasers of prescription drugs. These cases have alleged that pharmaceutical manufacturers have wrongfully kept less expensive generic drugs off the market, in violation of the antitrust laws. Those cases include: *In re Solodyn Antitrust Litig.*, 14 MD 2503 (D. Mass.) (\$76 million settlements); and *In re Aggrenox Antitrust Litig.*, No. 3:14-md-02516 (D. Conn.) (\$146 million settlement); *In re Skelaxin (Metaxalone) Antitrust Litig.*, No. 12-MD-2343 (E.D. Tenn.) (\$73 million settlement); *In re Wellbutrin XL Antitrust Litig.*, No. 08-2431 (E.D. Pa.) (\$37.5 million settlement with one of two defendants); *In re Opana ER Antitrust Litig.*, No. 14-cv-10150 (N.D. Ill.) and *In re Niaspan Antitrust Litig.*, No. 12-MD-2460 (E.D. Pa.).

Prior to joining the firm, Mr. Curley practiced in the litigation department of a large Philadelphia law firm where he represented clients in a variety of industries in complex commercial litigation in both state and federal court.

Josh P. Davis – Shareholder

Josh supervises the Firm’s San Francisco Bay Area Office. He focuses his practice on antitrust, appeals, class certification, and class action and complex litigation ethics. He is one of the leading scholars in the nation on antitrust procedure, class certification, and ethics in class actions and complex litigation.

Josh is currently a Research Professor at the University of California, Hastings College of the Law, where he is associated with the Center for Litigation and Courts, and the Director of the Center for Law and Ethics at the University of San Francisco School of Law. He has also taught at the Willamette University College of Law and the Georgetown University Law Center. He has testified before Congress on matters related to civil procedure and presented on matters related to private antitrust enforcement before the U.S. Department of Justice and the Federal Trade Commission.

Josh received a CLAY California Attorney of the Year Award in Antitrust in 2016. His law review article, “Defying Conventional Wisdom: The Case for Private Antitrust Enforcement,” 48 Ga. L. Rev. 1 (2013), won the 2014 award for best academic article from George Washington University School of Law and Institute on Competition Law. His scholarship has been cited by multiple federal appellate and trial courts. He has published dozens of articles and book chapters on antitrust, civil procedure, class certification, legal ethics, and legal philosophy, among other topics. He regularly presents throughout the country and the world at scholarly and professional conferences and symposia on aggregate litigation, civil procedure, and ethics. Recently, he has written various articles and book chapters on artificial intelligence (AI) and the law and is completing his first book, “Unnatural Law: AI, Consciousness, Ethics, and Legal Theory” (forthcoming in Cambridge University Press 2022/23).

Josh graduated from N.Y.U. School of Law in 1993, where he won the Frank H. Sommer Memorial Award for top general scholarship and achievement in his class, served as the Articles Editor for the N.Y.U. Law Review, and was admitted to the Order of the Coif. After law school, he was a law clerk for Patrick E. Higginbotham of the U.S. Court of Appeals for the Fifth Circuit. He was a partner at Lieff, Cabraser, Heimann & Bernstein, LLP, until 2000, when he entered full-time legal academia until joining the Firm in 2022.

Lawrence Deutsch – Shareholder

Mr. Deutsch has been involved in numerous major shareholder class action cases. He served as lead counsel in the Delaware Chancery Court on behalf of shareholders in a corporate governance litigation concerning the rights and valuation of their shareholdings. Defendants in the case were the Philadelphia Stock Exchange, the Exchange’s Board of Trustees, and six major Wall Street investment firms. The case settled for \$99 million and also included significant corporate governance provisions. Chancellor Chandler, when approving the settlement allocation and fee awards on July 2, 2008, complimented counsel’s effort and results, stating, “Counsel, again, I want to thank you for your extraordinary efforts in obtaining this result for the class.” The Chancellor had previously described the intensity of the litigation when he had approved the settlement, “All I can tell you, from someone who has only been doing this for roughly 22 years,

is that I have yet to see a more fiercely and intensely litigated case than this case. Never in 22 years have I seen counsel going at it, hammer and tong like they have gone at it in this case.”

Mr. Deutsch was one of principal trial counsel for plaintiffs in *Fred Potok v. Floorgraphics, Inc., et al.* (Phila Co. CCP 080200944 and Phila Co. CCP 090303768) resulting in an \$8 million judgment against the directors and officers of the company for breach of fiduciary duty.

Over his 25 years working in securities litigation, Mr. Deutsch has been a lead attorney on many substantial matters. Mr. Deutsch served as one of lead counsel in the *In Re Sunbeam Securities Litigation* class action concerning “Chainsaw” Al Dunlap (recovery of over \$142 million for the class in 2002). As counsel on behalf of the City of Philadelphia he served on the Executive Committee for the securities litigation regarding *Frank A. Dusek, et al. v. Mattel Inc., et al.* (recovery of \$122 million for the class in 2006).

Mr. Deutsch served as lead counsel for a class of investors in Scudder/Deutsche Bank mutual funds in the nationwide *Mutual Funds Market Timing* cases. Mr. Deutsch served on the Plaintiffs’ Omnibus Steering Committee for the consortium of all cases. These cases recovered over \$300 million in 2010 for mutual fund purchasers and holders against various participants in widespread schemes to “market time” and late trade mutual funds, including \$14 million recovered for Scudder/Deutsche Bank mutual fund shareholders.

Mr. Deutsch has been court-appointed Lead or a primary attorney in numerous complex litigation cases: *NECA-IBEW Pension Trust Fund, et al. v. Precision Castparts Corp., et al.* (Civil Case No. 3:16-cv-01756-YY); *Fox et al. v. Prime Group Realty Trust, et al.* United States District Court Northern District of Illinois (Civil Case No. 1:12-cv-09350) (\$8.25 million settlement pending); served as court-appointed lead counsel in *In Re Inergy LP Unitholder Litigation* (Del. Ch. No. 5816-VCP) (\$8 million settlement).

Mr. Deutsch served on a team of lead counsel in *In Re: CertainTeed Fiber Cement Siding Litigation*, E.D.Pa. MDL NO. 11-2270 (\$103.9 million settlement); *Tim George v. Uponor, Inc., et al.*, United States District Court, District of Minnesota, Case No. 12-CV-249 (ADM/JJK) (\$21 million settlement); *Batista, et al. v. Nissan North America, Inc.*, United States District Court, Southern District of Florida, Miami Division, Case No 1;14-cv-24728 (settlement valued at \$65,335,970.00).

In addition to his litigation work, Mr. Deutsch has been a member of the firm’s Executive Committee and also manages the firm’s paralegals. He has also regularly represented indigent parties through the Bar Association’s VIP Program, including the Bar’s highly acclaimed representation of homeowners facing mortgage foreclosure.

Prior to joining the firm, Mr. Deutsch served in the Peace Corps from 1973-1976, serving in Costa Rica, the Dominican Republic, and Belize. He then worked for ten years at the United States General Services Administration.

Mr. Deutsch is a graduate of Boston University (B.A. 1973), George Washington University's School of Government and Business Administration (M.S.A. 1979), and Temple University's School of Law (J.D. 1985). He became a member of the Pennsylvania Bar in 1986 and the New Jersey Bar in 1987. He has also been admitted to practice in Eastern District of Pennsylvania, the First Circuit Court of Appeals, the Second Circuit Court of Appeals, the Third Circuit Court of Appeals, the Fourth Circuit Court of Appeals, Eleventh Circuit Court of Appeals and the U.S. Court of Federal Claims as well as various jurisdictions across the country for specific cases.

William H. Ellerbe – Shareholder

William H. Ellerbe is a Shareholder in the Philadelphia office and practices in the firm's Whistleblower, *Qui Tam* & False Claims Act group, which has collectively recovered more than \$3 billion for federal and state governments, as well as over \$500 million for the firm's whistleblower clients. Mr. Ellerbe represents whistleblowers in litigation across the country and also actively assists in investigating and evaluating potential whistleblower claims before a lawsuit is filed.

Mr. Ellerbe received an A.B. in English from Princeton University. He graduated *magna cum laude* from the University of Michigan Law School and also received a certificate in Science, Technology, and Public Policy from the Ford School of Public Policy. During law school, Mr. Ellerbe was an Associate Editor of the *Michigan Telecommunications and Technology Law Review* and an active member of both the Environmental Law Society and the Native American Law Students Association.

Prior to joining the firm, Mr. Ellerbe clerked for the Honorable Anne E. Thompson of the United States District Court for the District of New Jersey. He also worked as a white collar and commercial litigation associate at two large corporate defense firms.

Mr. Ellerbe is admitted to practice in the state courts of Pennsylvania, New Jersey, and New York, as well as the Third and Fourth Circuit Courts of Appeals and the United State District Courts for the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, the Southern District of New York, and the Eastern District of New York.

Candice J. Enders – Shareholder

Candice J. Enders is a Shareholder in the Antitrust practice group. She concentrates her practice in complex antitrust litigation.

Ms. Enders has significant experience investigating and developing antitrust cases, navigating complex legal and factual issues, negotiating discovery, designing large-scale document reviews, synthesizing and distilling conspiracy evidence, and working with economic experts to develop models of antitrust impact and damages. Her work on antitrust conspiracy cases has contributed to significant settlements totaling hundreds of millions of dollars, including in *In re Domestic Drywall Antitrust Litigation*, No. 13-2437 (E.D. Pa.) (\$190 million in total settlements); *In re Commodity Exchange, Inc. Gold Futures & Options Trading Litigation*, No. 14-2548 (S.D.N.Y.) (\$60 million settlement with Deutsche Bank preliminarily approved; preliminary approval of \$42

million settlement with Defendant HSBC pending; litigation continuing against remaining defendants); *In re Microcrystalline Cellulose Antitrust Litigation*, No. 01-111 (E.D. Pa.) (\$50 million settlement achieved shortly before trial).

In addition to her case work, Ms. Enders contributes to the administration of the firm by serving as the firm's Attorney Recruitment Coordinator, Paralegal Coordinator, and a member of the Diversity, Equity & Inclusion Task Force.

Michael T. Fantini – Shareholder

Michael T. Fantini is a Shareholder in the Consumer Protection and Commercial Litigation practice groups. Mr. Fantini concentrates his practice on consumer class action litigation.

Mr. Fantini has considerable experience in notable consumer cases such as: *In re TJX Companies Retail Security Breach Litigation*, Master Docket No. 07-10162 (D. Mass) (class action brought on behalf of persons whose personal and financial data were compromised in the largest computer theft of personal data in history - settled for various benefits valued at over \$200 million); *In re Educational Testing Service Praxis Principles of Learning and Teaching: Grade 7-12 Litigation*, MDL No. 1643 (E.D. La. 2006) (settlement of \$11.1 million on behalf of persons who were incorrectly scored on a teachers' licensing exam); *Block v. McDonald's Corporation*, No: 01CH9137 (Cir. Ct. Of Cook County, Ill.) (settlement of \$12.5 million where McDonald's failed to disclose beef fat in french fries); *Fitz, Inc. v. Ralph Wilson Plastics Co.*, No. 1-94-CV-06017 (D. N.J.) (claims-made settlement whereby fabricators fully recovered their losses resulting from defective contact adhesives); *Parker v. American Isuzu Motors, Inc.*; No: 3476 (CCP, Philadelphia County) (claims-made settlement whereby class members recovered \$500 each for their economic damages caused by faulty brakes); *Crawford v. Philadelphia Hotel Operating Co.*, No: 04030070 (CCP Phila. Cty. 2005) (claims-made settlement whereby persons with food poisoning recovered \$1,500 each); *Melfi v. The Coca-Cola Company* (settlement reached in case involving alleged misleading advertising of Enviga drink); *Vaughn v. L.A. Fitness International LLC*, No. 10-cv-2326 (E.D. Pa.) (claims made settlement in class action relating to failure to cancel gym memberships and improper billing); *In re Chickie's & Pete's Wage and Hour Litigation*, Master File No. 12-cv-6820 (E.D. Pa.) (settled class action relating to failure to pay proper wage and overtime under FLSA).

Notable security fraud cases in which Mr. Fantini was principally involved include: *In re PSINet Securities Litigation*, No: 00-1850-A (E.D. Va.) (settlement in excess of \$17 million); *Ahearn v. Credit Suisse First Boston, LLC*, No: 03-10956 (D. Mass.) (settlement of \$8 million); and *In re Nesco Securities Litigation*, 4:01-CV-0827 (N.D. Okla.).

Mr. Fantini has represented the City of Chicago in an action against certain online travel companies, such as Expedia, Hotels.com, and others, for their alleged failure to pay hotel taxes. He also represented the City of Philadelphia in a similar matter.

Prior to joining the firm, Mr. Fantini was a litigation associate with Dechert LLP. At George Washington University Law School, he was a member of the Moot Court Board. From 2017 - 2021, Mr. Fantini was named a Pennsylvania Super Lawyer by Thomson Reuters.

Michael J. Kane – Shareholder

Michael J. Kane, a Shareholder of the firm, is a graduate of Rutgers University and Ohio Northern University School of Law, with distinction, where he was a member of the Law Review. Mr. Kane is admitted to practice in Pennsylvania and various federal courts.

Mr. Kane joined the antitrust practice in 2005. Prior to joining the firm, Mr. Kane was affiliated with Mager, White & Goldstein, LLP where he represented clients in complex commercial litigation involving alleged unlawful business practices including: violations of federal and state antitrust and securities laws, breach of contract and other unfair and deceptive trade practices. Mr. Kane has extensive experience working with experts on economic issues in antitrust cases, including impact and damages. Mr. Kane has served in prominent roles in high profile antitrust, securities, and unfair trade practice cases filed in courts around the country.

Currently, Mr. Kane is one the lead attorneys actively litigating and participating in all aspects of the *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y.) alleging, *inter alia*, that certain of Visa and MasterCard rules, including anti-steering restraints and default interchange fees, working in tandem have caused artificially inflated interchange fees paid by Merchants on credit and debit card transactions. After over a decade of litigation, a settlement of as much as \$6.24 billion and no less than \$5.54 billion was preliminary approved in January 2019. He is also one of the lead counsel in *Contant, et al. v. Bank of America Corp., et al.*, 1:17-cv-03139-LGS (S.D.N.Y.) alleging a conspiracy among horizontal competitors to fix the prices of foreign currencies and certain foreign currency instruments to recover damages caused by defendants on behalf of plaintiffs and members of a proposed class of indirect purchasers of FX instruments from defendants.

Mr. Kane was also one of the lead lawyers in *Castro v. Sanofi Pasteur, Inc.*, No. 2:11-cv-07178-JMV-MAH (D.N.J.), a certified class action of over 26,000 physician practices, other healthcare providers, and vaccine distributors direct purchasers, alleging that defendant Sanofi engaged in anticompetitive conduct to maintain its monopoly in the market for MCV4 vaccines resulting in artificially inflated prices for Sanofi's MCV4 vaccine Menactra and the MCV4 vaccine Menveo. In October 2017 the court granted final approval the \$61.5 million settlement.

Mr. Kane also had a leading role in *Ross v. American Express Company* (S.D.N.Y.) (\$49.5 million settlement achieved after more than 7 years of litigation and after summary judgment was denied). In the related matter *Ross v. Bank of America* (S.D.N.Y.) involving claims that the defendant banks and American Express unlawfully acted in concert to require cardholders to arbitrate disputes, including debt collections, and to preclude cardholders from participating in any class actions, Mr. Kane was one of the primary trial counsel in the five week bench trial. Mr. Kane also has had a prominent role in several antitrust cases against pharmaceutical companies challenging so-called pay for delay agreements wherein the brand drug company allegedly seeks

to delay competition from generic equivalents to the brand drug through payments by the brand drug company to the generic drug company. Mr. Kane served as co-lead counsel in *In re Microsoft Corporation Massachusetts Consumer Protection Litigation* (Mass. Super. Ct., Middlesex Cty.), in which plaintiffs alleged that as a result of Microsoft Corporation's anticompetitive practices, Massachusetts consumers paid more than they should have for Microsoft's operating systems and software. The case was settled for \$34 million. Other cases in which Mr. Kane has had a prominent role include: *In re Currency Conversion Fee Antitrust Litig.* (S.D.N.Y.) (settlement for \$336 million and injunctive relief); *In re Nasdaq Market Makers Antitrust Litig.* (S.D.N.Y.); *In re Compact Disc Antitrust Litig.* (C.D. Cal.); *In re WorldCom, Inc. Securities Litig.* (S.D.N.Y.); *In re Lucent Technologies, Inc. Securities Litig.* (D.N.J.); *City Closets LLC v. Self Storage Assoc., Inc.* (S.D.N.Y.); *Rolite, Inc. v. Wheelabrator Environmental Sys. Inc.*, (E.D. Pa.); and *Amin v. Warren Hospital* (N.J. Super.).

Robert Litan – Shareholder

Robert Litan is a Shareholder in the Antitrust practice group. Litan is one of the few practicing lawyers (in any field, including antitrust) with a PhD in economics and an extensive research and testimonial career in economics. During his legal career, Litan has specialized in administrative and antitrust litigation, concentrating on economic issues, working closely with economic experts (having been a testimonial witness in more than 20 legal and administrative proceedings himself). He previously was a partner with Powell, Goldstein, Frazier and Murphy (Washington, D.C and Atlanta) and Korein Tillery (St. Louis Chicago). He began his legal career as an Associate at Arnold & Porter (Washington, D.C.)

Litan has directed economic research at three leading national organizations: the Brookings Institution, the Kauffman Foundation and Bloomberg Government.

Litan has held several appointed positions in the federal government. In 1993, he was appointed Principal Deputy Assistant Attorney General in the Antitrust Division of the Justice Department, where he oversaw civil non-merger litigation and the Department's positions on regulatory matters, primarily in telecommunications. During his tenure, he settled the Department's antitrust lawsuit against the Ivy League and MIT for fixing financial aid awards, oversaw the Department's first monopolization case against Microsoft (resulting in 1994 consent decree) and the initial stages of the Antitrust Division's price fixing case against Nasdaq (also resulting in a consent decree). In 1995, Litan was appointed Associate Director of the Office of Management and Budget, where he oversaw the budgets of five cabinet level agencies.

Litan has co- chaired two panels of studies for the National Academy of Sciences (Measuring Innovation and Disaster Loan Estimation), has served on one other NAS Committee (Use of Scientific Evidence), and consulted for NAS (on energy modeling). He has also been a member of the Presidential-Congressional Commission on the Causes of the Savings and Loan Crisis (1991-93).

Litan has consulted for a broad range of private and governmental organizations, including the U.S. Justice Department (antitrust division), the U.S. Treasury Department, the Federal Reserve

Bank of New York, the Federal Home Loan Bank of San Francisco, and the Financial Institutions Subcommittee of the House Banking Committee, the Monetary Authority of Singapore and the World Bank.

Litan has been adjunct professor teaching banking law at the Yale Law School and a Lecturer in Economics at Yale University. He also has taught economics and counter-insurgency at the U.S. Army Command General Staff College, Ft. Leavenworth

Hans Lodge – Shareholder

Hans Lodge is a zealous advocate and is dedicated to protecting the rights of consumers in and out of court. Hans assists consumers who have been denied jobs or housing due to inaccurate criminal history information reporting in their employment/tenant background check reports. Hans also assists consumers who have been denied credit due to inaccurate information reporting in their credit reports and have suffered harm due to unlawful debt collection behavior.

Hans is an aggressive and strategic litigator who has a reputation of working tirelessly to get favorable outcomes for his clients. Hans understands how frustrating it can be trying to deal with background check companies, credit reporting agencies, credit bureaus, and debt collectors, and has a passion for helping clients navigate these areas of the law during their times of need.

Prior to joining the firm, Hans combined his passions for fighting for the little guy and oral advocacy by representing consumers in individual and class action litigation where he held businesses, banks, background check companies, credit bureaus, and debt collectors accountable for illegal practices. As an Associate Attorney at a consumer rights law firm, Hans represented consumers who had trouble paying their bills and were abused and harassed by debt collection agencies, some of whom had their motor vehicles wrongfully repossessed, bringing numerous individual and class action claims under the Fair Debt Collection Practices Act (FDCPA).

Hans also represented consumers who had trouble obtaining credit, employment, and housing due to inaccuracies in their credit reports and background check reports, bringing numerous individual and class action claims under the Fair Credit Reporting Act (FCRA). As an Associate Attorney at a national employment and consumer protection law firm, Hans represented consumers who purchased defective products and employees misclassified as independent contractors, bringing class action claims under consumer protection statutes and the Fair Labor Standards Act (FLSA).

Hans grew up in the Twin Cities and received his Bachelor's Degree from Gustavus Adolphus College in St. Peter, Minnesota, where he double-majored in Political Science and Communication Studies and graduated with honors. His first experience resolving quasi-legal disputes began as a Student Representative on the Campus Judicial Board, where he served for three years and resolved numerous complex disputes between students and the College. His interests in sports and ethics took him to New Zealand, Australia, and Fiji, where he studied Sports Ethics.

During his time at Marquette University Law School, Hans concentrated his legal studies on civil litigation and sports law. As a second-year law student, Hans gained valuable experience working as a law clerk for the Honorable Joan F. Kessler at the Wisconsin Court of Appeals. He also served as a member of the Marquette Sports Law Review where he wrote and edited articles about legal issues impacting the sports industry.

As a member of Marquette Law's moot court team, his brief writing and oral advocacy skills earned him a regional championship and an appearance in the national competition at the New York City Bar Association. Hans was also a member of Marquette's mock trial team, finishing in third place at the regional competition at the Daley Center in Chicago, Illinois.

Mr. Lodge is admitted to practice law in the United States District Court, District of Minnesota; United States District Court, Western District of Wisconsin; and both Minnesota and Wisconsin state courts.

In addition to practicing law, Hans is an Adjunct Professor at Concordia University, St. Paul, where he teaches a sports law course in the Master of Arts in Sports Management program.

Patrick F. Madden – Shareholder

Patrick F. Madden is a Shareholder in the Antitrust, Consumer Protection, Insurance Fraud, and Predatory Lending and Borrowers' Rights practice groups. His practice principally focuses on class actions concerning antitrust violations, financial practices, and insurance products.

Mr. Madden has served in key roles in multiple nationwide consumer class actions. For example, he represented homeowners whose mortgage loan servicers force-placed extraordinarily high-priced insurance on them and allegedly received a kickback from the insurer in exchange. Collectively, Mr. Madden's force-placed insurance settlements have made more than \$175 million in recoveries available to class members.

He has also represented plaintiffs in antitrust class actions. For example, Mr. Madden represents a proposed class of elite mixed martial arts fighters in an antitrust lawsuit against the Ultimate Fighting Championship. *Le, et al. v. Zuffa, LLC*, No. 15-cv-1045 (D. Nev.). Mr. Madden also represents a proposed class of broiler chicken farmers in an antitrust suit against the major chicken processing companies for colluding to suppress compensation to the farmers.

Prior to attending law school, Mr. Madden worked at the United States Department of Labor, Office of Labor-Management Standards as an investigator during which time he investigated allegations of officer election fraud and financial crimes by union officers and employees. While at Temple Law School, Mr. Madden was the Executive Editor of Publications for the Temple Journal of Science, Technology & Environmental Law.

Ellen T. Noteware – Shareholder

Ms. Noteware has successfully represented investors, retirement plan participants, employees, consumers, and direct purchasers of prescription drug products in a variety of class action cases. She currently chairs the firm's Pro Bono Committee.

Ms. Noteware served on the trial team for *Cook v. Rockwell Int'l Corp.* No. 90-181 (D. Colo.) and received, along with the entire trial team, the "Trial Lawyer of the Year" award in 2009 from the Public Justice Foundation for their work on the case, which resulted in a jury verdict of \$554 million in February 2006, after a four-month trial, on behalf of thousands of property owners near the former Rocky Flats nuclear weapons plant located outside Denver, Colorado. The jury verdict was then the largest in Colorado history, and was the first time a jury has awarded damages to property owners living near one of the nation's nuclear weapons sites. In 2008, after extensive post-trial motions, the District Court entered a \$926 million judgment for the plaintiffs. The jury verdict in the case was vacated on appeal in 2010. In 2015, on a second trip to the Tenth Circuit Court of Appeals, Plaintiffs secured a victory with the case being sent back to the district court. In 2016, the parties reached a \$375 million settlement, which received final approval in 2017.

Ms. Noteware also has played a leading role in numerous antitrust cases representing direct purchasers of prescription drugs. Many of these cases have alleged that pharmaceutical manufacturers have wrongfully kept less expensive generic drugs off the market, in violation of the antitrust laws. Many of these cases have resulted in substantial cash settlements, including *In re: Namenda Direct Purchaser Antitrust Litigation*, (S.D.N.Y.) (\$750 million settlement – largest single-defendant settlement ever for a case alleging delayed generic competition); *In re Loestrin 24 Fe Antitrust Litigation*, (D.R.I.) (\$120 million settlement 3 weeks before trial was set to begin); *In re Ovcon Antitrust Litigation*, (D.D.C.) (\$22 million settlement); *In re Tricor Direct Purchaser Antitrust Litigation*, (D. Del.) (\$250 million settlement); *Meijer, Inc. v. Abbott Laboratories*, (N.D. Cal.) (Norvir) (\$52 million); and *In re Celebrex*, No. 14-cv-00361 (E.D. Va.) (\$95 million).

Ms. Noteware is also extensively involved in litigating breach of fiduciary duty class action cases under the Employee Retirement Income Securities Act ("ERISA"). Her ERISA settlements include: *In re Nortel Networks Corp. ERISA Litigation* (M.D. Tenn.) (\$21 million settlement); *In re Lucent Technologies, Inc. ERISA Litigation* (D.N.J.) (\$69 million settlement); *In re SPX Corporation ERISA Litigation* (W.D.N.C.) (\$3.6 million settlement); *Short v. Brown University*, (D.R.I.) (\$3.5M settlement plus requirement that independent adviser for ERISA plans be retained); *Dougherty v. The University of Chicago*, No. 1:17-cv-03736 (N.D. Ill.) (\$6.5M settlement); and *Nicolas v. The Trustees of Princeton University*, No. 3:17-cv-03695 (D.N.J.) (settlement announced).

Ms. Noteware is a graduate of Cornell University (B.S. 1989) and the University of Wisconsin-Madison Law School (J.D. *cum laude* 1993) where she won the Daniel H. Grady Prize for the highest grade point average in her class, served as Managing Editor of the Law Review, and earned Order of the Coif honors. She is currently a member of the Pennsylvania, New York, and District of Columbia bars.

Russell D. Paul – Shareholder

Russell Paul is a Shareholder in the Consumer Protection, Qui Tam/Whistleblower, and Securities/Governance/Shareholder Rights practice groups and heads the Automobile Defect practice area. He concentrates his practice on consumer class actions, securities class actions and derivative suits, complex securities, and commercial litigation matters, and False Claims Act suits.

Mr. Paul has successfully litigated and led consumer protection and product defect actions in the automotive, pet food, soft drink, and home products industries. He has been appointed to a leadership position in several automotive defect cases. See *Francis v. General Motors, LLC*, No. 2:19-cv-11044-DML-DRG (E.D. Mich.), ECF No. 40 (appointed as member of Plaintiffs' Steering Committee); *Weston v. Subaru of America, Inc.*, No. 1:20-cv-05876 (D.N.J.), ECF No. 49 (appointed as Interim Co-Lead Counsel); *Miller v. Ford Motor Co.*, No. 2:20-cv-01796 (E.D. Cal.) ECF No. 60 (appointed to Interim Class Counsel Executive Committee) and *Powell v. Subaru of America, Inc.*, No. 1:19-cv-19114 (D.N.J.), ECF No. 26 (appointed as Interim Co-Lead Counsel). Mr. Paul has litigated securities class actions against Tyco International Ltd., Baxter Healthcare Corp., ALSTOM S.A., Able Laboratories, Inc., Refco Inc., Toll Brothers and the Federal National Mortgage Association (Fannie Mae). He has also litigated derivative actions in various state courts around the country, including in the Delaware Court of Chancery. Mr. Paul has also briefed and argued several federal appeals, including in the Third, Sixth and Ninth Circuits.

In addition to securities litigation, Mr. Paul has broad corporate law experience, including mergers and acquisitions, venture capital financing, proxy contests, and general corporate matters. He began his legal career in the New York office of Skadden, Arps, Slate, Meagher & Flom.

Mr. Paul has been designated a "Pennsylvania Super Lawyer" and a "Top Attorney in Pennsylvania."

Mr. Paul graduated from the Columbia University School of Law (J.D. 1989) where he was a Harlan Fiske Stone Scholar, served on the Moot Court Review Board, was an editor of Pegasus (the law school's catalog) and interned at the United States Attorneys' Office for the Southern District of New York. He completed his undergraduate studies at the University of Pennsylvania, earning a B.S. in Economics from the Wharton School (1986) and a B.A. in History from the College of Arts and Sciences (1986). He was elected to the Beta Gamma Sigma Honors Society.

Alexandra Koropey Piazza – Shareholder

Alexandra Koropey Piazza, Shareholder, is a member of the firm's Employment Law, Consumer Protection and Lending Practices & Borrowers' Rights practice groups. In the Employment Law practice group, Ms. Piazza primarily focuses on wage and hour class and collective actions arising under state and federal law. Ms. Piazza's work in the Consumer Protection and Lending Practices & Borrowers' Rights practice groups involves consumer class actions concerning financial practices.

Ms. Piazza is a graduate of the University of Pennsylvania and Villanova University School of Law. During law school, Ms. Piazza served as a managing editor of the Villanova Sports and Entertainment Law Journal and as president of the Labor and Employment Law Society. Ms. Piazza also interned at the United States Attorney's Office and served as a summer law clerk for the Honorable Eduardo C. Robreno of the United States District Court for the Eastern District of Pennsylvania.

Barbara A. Podell – Shareholder

Barbara A. Podell is a Shareholder in the Securities practice group at the firm. She concentrates her practice on securities class action litigation.

Ms. Podell graduated from the University of Pennsylvania (*cum laude*) and the Temple University School of Law (*magna cum laude*), where she was Editor-in-Chief of the Temple Law Quarterly.

Ms. Podell was one of the firm's senior attorneys representing the Pennsylvania State Employees' Retirement System ("SERS") as the lead plaintiff in the *In re CIGNA Corp. Sec. Litig.*, No. 02-CV-8088 (E.D. Pa.), a federal securities fraud class action in which SERS moved for, and was appointed, lead plaintiff. CIGNA allegedly concealed crucial operational problems, which, once revealed, caused the company's stock price to fall precipitously. The firm obtained a \$93 million settlement. This was a remarkable recovery because there were no accounting restatements, government investigations, typical indicators of financial fraud, or insider trading. Moreover, the case was settled on the eve of trial (22.7% of losses recovered).

Before joining the firm, Ms. Podell was a founding member of Savett Frutkin Podell & Ryan, P.C., and before that, a shareholder at Kohn, Savett, Klein & Graf and an associate at Dechert LLP, all in Philadelphia.

Camille Fundora Rodriguez – Shareholder

Ms. Rodriguez is a Shareholder in the firm's Employment & Unpaid Wages, Consumer Protection, and Lending Practices & Borrowers' Rights practice groups. Ms. Rodriguez primarily focuses on wage and hour class and collective actions arising under the Fair Labor Standards Act and state laws. She is also the Diversity, Equity, and Inclusion Coordinator and leads the Firm's DEI Task Force, which enacts a broad range of diversity efforts, including efforts to hire and retain attorneys and non-attorneys from diverse backgrounds and to foster an inclusive work environment, including through Firmwide trainings on implicit bias issues that may impact the workplace.

Prior to joining the firm, Ms. Rodriguez practiced in the litigation department at a boutique Philadelphia law firm where she represented clients in a variety of personal injury, disability, and employment discrimination matters. Ms. Rodriguez is a graduate of Widener University School of Law.

Ms. Rodriguez was recently named a 2023 The Best Lawyers in America: Ones to Watch. She was also a Pennsylvania Super Lawyer "Rising Star" in 2022. In 2021, Ms. Rodriguez was named a "Rising Star" by *Law360*, a "Rising Star of the Plaintiffs Bar" by the *National Law Journal*, and

“Lawyer on the Fast Track” by *The Legal Intelligencer*. She also has been a Pennsylvania Super Lawyer “Rising Star” between 2017 and 2021.

Ms. Rodriguez is an active member of the Pennsylvania, Philadelphia, and Hispanic Bar Associations.

Y. Michael Twersky – Shareholder

Y. Michael Twersky concentrates his practice primarily on representing plaintiffs in complex litigation, including on insurance, antitrust, and environmental matters.

In the past, Mr. Twersky has worked on a wide variety of insurance matters including an insurance case in which a Federal District Court found on Summary Judgement that a large insurance company had breached its policy when it denied benefits under an accidental death insurance plan. Mr. Twersky has also worked on a number of antitrust class actions alleging that pharmaceutical manufacturers wrongfully kept less expensive generic drugs off the market, in violation of the antitrust laws, including: *In re Skelaxin (Metaxalone) Antitrust Litigation*, 1:12-md-02343 (E.D. Tenn.) (\$73 million settlement in 2014), and *In re Solodyn Antitrust Litig.*, 14 MD 2503 (D. Mass.) (combined settlements in excess of \$76 million in 2018). Mr. Twersky has also represented inmates in connection with allegations that various inmate calling services charged unreasonable rates and fees in violation of the Federal Communication Act.

Currently, Mr. Twersky is litigating a number of complex class actions related to insurance products, including proposed class actions in multiple forums against a workers’ compensation insurance company alleging that the company deceptively sold illegal workers’ compensation programs that were not properly filed with state regulators. *E.g.*, *Shasta Linen Supply, Inc. v Applied Underwriters et al.*, No. 2:16-cv-0158 (N.D. Cal.). Mr. Twersky is also involved in a proposed class action in Federal Court brought on behalf of Alaska-enrolled Medicaid Healthcare Providers against the developers of the Alaska Medicaid Management Information System Company alleging that providers were harmed as a result of the negligent and faulty design and implementation of the MMIS system. *See South Peninsula Hospital et al v. Xerox State Healthcare, LLC*, 3:15-cv-00177 (D. Alaska). Mr. Twersky is also involved in environmental litigation on behalf of various states to recover the costs of remediation for contamination to groundwater resources.

Mr. Twersky graduated from Temple University Beasley School of Law in 2011, where he was a member of the Rubin Public Interest Law Honors Society and a Class Senator. In addition, Mr. Twersky advised various clients in business matters as part of Temple University's Business Law Clinic.

Daniel J. Walker – Shareholder

Dan Walker is a Shareholder of the firm, which he rejoined in July 2017 after serving three years in the Health Care Division at the Federal Trade Commission. Mr. Walker practices in the firm's Washington, D.C. office.

While at the Federal Trade Commission, Mr. Walker investigated and litigated antitrust matters in the health care industry. In addition to leading various nonpublic investigations in the pharmaceutical and health information technology sectors, Mr. Walker litigated *Federal Trade Commission v. AbbVie Inc., et al.*, a case alleging that a brand pharmaceutical manufacturer engaged in sham patent litigation to delay generic competition, and *Federal Trade Commission v. Cephalon Inc.*, a "pay-for-delay" lawsuit over a brand pharmaceutical manufacturer's payment to four generic competitors in return for the generics' agreement to delay entry into the market. The Cephalon case settled shortly before trial for \$1.2 billion-the largest equitable monetary relief ever secured by the Federal Trade Commission-as well as significant injunctive relief.

During his time in private practice, Mr. Walker has litigated cases on behalf of plaintiffs and defendants in many areas of law, including antitrust, financial fraud, breach of contract, bankruptcy, and intellectual property. Mr. Walker has helped recover hundreds of millions of dollars on behalf of plaintiffs, including in *In re Titanium Dioxide Antitrust Litigation* (with settlements totaling \$163.5 million for purchasers of titanium dioxide), *In re High Tech Employee Antitrust Litigation* (with settlements totaling \$435 million for workers in the high tech industry), and *Adriana Castro, M.D., P.A., et al. v. Sanofi Pasteur Inc.*, No. 11-cv-07178 (D.N.J.) (with a \$61.5 million settlement pending court approval for purchasers of pediatric vaccines). Mr. Walker was also a member of the team that recovered the funds lost by account holders during MF Global's collapse and a member of the trial team that successfully represented the Washington Mutual stockholders seeking to recover investments lost in the bankruptcy.

In addition, Mr. Walker has spoken frequently on antitrust issues, including on the intersection of antitrust and intellectual property in the health care industry.

Mr. Walker is a *magna cum laude* graduate of Amherst College and Cornell University Law School, where he was an Articles Editor for the Cornell Law Review. Before entering private practice, Mr. Walker clerked for the Honorable Richard C. Wesley of the United States Court of Appeals for the Second Circuit.

Michaela Wallin – Shareholder

Michaela Wallin is a Shareholder in the Antitrust and Employment Law practice groups. Ms. Wallin's work in the Antitrust group involves complex class actions, including those alleging that pharmaceutical manufacturers have wrongfully kept less expensive drugs off the market, in violation of the antitrust laws. In the Employment Law Group, Ms. Wallin focuses on wage and hour class and collective actions arising under federal and state law.

Prior to joining the firm, Ms. Wallin served as a law clerk for the Honorable James L. Cott of the United States District Court of the Southern District of New York. She also completed an Equal Justice Works Fellowship at the ACLU Women's Rights Project, where she worked to challenge local laws that target domestic violence survivors for eviction and impede tenants' ability to call the police.

Ms. Wallin is a graduate of Columbia Law School, where she was a Harlan Fiske Stone Scholar. Ms. Wallin graduated *magna cum laude* from Bowdoin College, where she was Phi Beta Kappa and a Sarah and James Bowdoin Scholar.

Alfred W. Zaher – Shareholder

Alfred Zaher is a Shareholder with the firm's Intellectual Property Department and he focuses his practice on patent, trademark, and trade secret litigation, licensing, and counseling. He has experience representing clients before the U.S. Patent and Trademark Office and the U.S. Copyright Office. He counsels companies in the biotechnology, pharmaceuticals, medical devices, electronics, and software industries. Having close relationships with Chinese officials and law firms, Alfred has a particular focus on managing clients' patent and trademark portfolios in China, including securing and prosecuting infringers in the Chinese court system. In his role as the firm's Chief Diversity & Inclusion Officer, Alfred is responsible for overseeing, implementing, and providing leadership to Montgomery McCracken's diversity initiatives. Prior to his legal career, Alfred was a research engineer and electrical engineer with more than 10 years of technical experience with companies like The Boeing Company and Litton Industries.

Senior Counsel

Andrew Abramowitz – Senior Counsel

Andrew Abramowitz, Senior Counsel in the Securities Department, concentrates his practice in shareholder litigation, representing investors in matters under the federal securities laws and state law governing breach of fiduciary duty. Prior to joining the firm, Mr. Abramowitz was a partner with a prominent Philadelphia law firm where he practiced for more than twenty years.

Mr. Abramowitz has served as one of the lead counsel in numerous cases, including, of note, *In re Parmalat Securities Litigation* (S.D.N.Y.), often referred to as "the Enron of Europe," which was a worldwide securities fraud involving an international dairy conglomerate; *In re SCOR Holding (Switzerland) AG Litigation* (S.D.N.Y.), the first case ever to secure recovery for investors in both a U.S. jurisdiction and a foreign forum; and *In re Abbott Depakote Shareholder Derivative Litigation* (N.D. Ill.), involving the off-label marketing of an anti-seizure drug.

Other notable cases in which Mr. Abramowitz played a significant role include: *Howard v. Liquidity Services, Inc.* (D.D.C.); *In re The Bancorp, Inc. Securities Litigation* (D. Del.); *In re Life Partners Holdings, Inc. Derivative Litigation* (W.D. Tex.); *In re Synthes Inc. Shareholder Litigation* (Del. Ch.); *In re Atheros Communications, Inc. Shareholder Litigation* (Del. Ch.); *Utah Retirement Systems v. Strauss* (American Home Mortgage) (E.D.N.Y.); *In re PSINet, Inc. Securities Litigation* (E.D. Va.); *Penn Federation BMW v. Norfolk Southern Corp.* (E.D. Pa.); *Inter-Local Pension Fund of the Graphic Communications Conference of the International Brotherhood of Teamsters v. Cybersource Corp.* (Del. Ch.).

He previously served as Legal Counsel to Tradeoffs, a popular health policy podcast launched by a prominent Philadelphia journalist.

Mr. Abramowitz graduated *cum laude* from Franklin & Marshall College (1993) where he earned membership in Phi Beta Kappa. He earned a J.D. from the University of Maryland School of Law (1996), where he was Assistant Editor for *The Business Lawyer*, published jointly with the American Bar Association.

He was a long-standing member of the Corporate Advisory Board of the Pennsylvania Association of Public Employee Retirement Systems (PAPERS), an organization dedicated to educating trustees and fiduciaries of public pension funds throughout Pennsylvania. He has also participated for more than fifteen years in the University of Pennsylvania School of Law's Mentoring Program, in which he mentors international students in the L.L.M. program about the practice of law in the U.S. He has written and spoken extensively on matters relating to securities litigation and corporate governance.

Mr. Abramowitz is also the author of two novels, *A Beginner's Guide to Free Fall* (Lake Union Publishing, 2019), and *Thank You, Goodnight* (Touchstone/Simon & Schuster, 2015).

Natisha Aviles – Senior Counsel

Natisha Aviles is Senior Counsel in the firm's Antitrust practice group. She concentrates her practice on complex antitrust litigation.

Stephanie K. Benecchi – Senior Counsel

Stephanie K. Benecchi is Senior Counsel with the firm's Intellectual Property Department in Philadelphia. Prior to joining Berger Montague, Stephanie was a partner at Montgomery McCracken Walker & Rhoads in their Philadelphia and Cherry Hill, NJ offices, where she focused her practice on commercial litigation, including class action defense, as well as white collar defense and government investigations. Prior to her time at MMWR, Stephanie was an associate at Kasowitz Benson Torres in New York.

Stephanie manages an interdisciplinary litigation team representing a medical device manufacturer in multiple patent infringement suits. Stephanie's experience focuses on health care, where she represents both entities and individuals from health systems, medical practices, and medical device and pharmaceutical manufacturers in conjunction with government investigations including billing, labeling and monitoring of medical devices, and pharmaceutical sales practices.

Stephanie is a member of the Legal Ethics and Professional Responsibility committee for the Pennsylvania Bar Association, and has devoted time to speaking and writing on legal ethics issues. Her presentations have yielded "wow" reviews from attendees impressed with her ability to tackle difficult issues like mental health services on campus. Her publications regarding the ethics of representing clients at risk of suicide provided valuable guidance to the bar. Stephanie co-wrote articles on the merits of removing "zeal" from the ABA model rules of professional conduct, published by the ABA Section of Litigation Ethics and Professionalism ("Exploring the Bounds of Professionalism: Is it Time to Remove 'Zeal' from the ABA Model Rules of Professional

Conduct?”) and the Pennsylvania Lawyer (“The Pennsylvania Supreme Court Should Remove the ‘Z’ Words from the Rules of Professional Conduct”).

Stephanie is a graduate of Fordham Law School, where she served as a staff member on the Fordham Journal of Corporate & Financial Law, and received the Archibald R. Murray Public Service Award for externing at the NYSE. Stephanie also graduated from Columbia University with a B.A. in Psychology, where she was a member of the Varsity Women’s Swim Team.

Mark DeSanto – Senior Counsel

Mark B. DeSanto is Senior Counsel in the Firm’s Consumer Protection department in Philadelphia. Prior to joining Berger Montague, Mark was an associate at Sauder Schelkopf where he litigated various consumer class actions with a particular emphasis on automotive defect cases, Chimicles Schwartz Kriner & Donaldson-Smith where he litigated various consumer, data breach, and ERISA class actions that helped recover over \$82 million for aggrieved class members and was a member of the firm’s securities financial institution marketing committee, and Kessler Topaz Meltzer & Check where he worked as an associate in the securities department and helped secure over \$220 million for investors in securities fraud class actions. In April 2023, Mark was selected by the Legal Intelligencer as a “Lawyer on the Fast Track.”

Mark graduated from the University of Miami School of Law, cum laude, in 2013, where he was a member of the National Security and Armed Conflict Law Review and earned President’s Honor Roll and Dean’s List distinction in multiple semesters. Mark also earned his Bachelor of Business Administration in Finance from the University of Miami in 2009. Mark is admitted to practice law in Florida, Pennsylvania, and New Jersey.

Jennifer Elwell – Senior Counsel

Jennifer Elwell is Senior Counsel in the firm’s Consumer Protection group. She concentrates her practice in complex civil litigation involving actions brought on behalf of consumers for corporate wrongdoing and consumer fraud.

Patrick J. Farley – Senior Counsel

Patrick J. Farley is Senior Counsel in the firm’s Intellectual Property Department. Mr. Farley has over 20 years of international experience in intellectual property law and concentrates his practice on all aspects of intellectual property, including patent drafting, patent prosecution, patent litigation, patent and trademark portfolio management, and licensing. Patrick counsels companies in the biotechnology and pharmaceuticals industries with a particular focus on patent and trademark portfolios, agreements, and due diligence. Prior to joining Berger Montague, Patrick was a partner at a Philadelphia law firm.

Abigail J. Gertner – Senior Counsel

Abigail J. Gertner is an attorney in the firm’s Philadelphia office and practices in the firm’s Consumer Protection and ERISA Litigation practice groups.

Before joining the firm, Ms. Gertner worked at both plaintiff and defense firms, where she gained experience in complex litigation, including consumer fraud, ERISA, toxic tort, and antitrust matters. She concentrates her current practice on automotive defect, consumer fraud, and ERISA class actions.

Ms. Gertner graduated from Santa Clara University School of Law in 2003, where she interned for the Santa Clara County District Attorney's Office in the Child and Elder Abuse Unit. She completed her undergraduate studies at Tulane University in 2000, earning a B.S. in Psychology and a B.A. in Classics.

She is also active in her community, formerly serving as a Youth Aid Panel chairperson for Upland in Delaware County. She now serves on the Upland Borough Council, beginning her four-year term in January 2020.

Ms. Gertner is admitted to practice in state courts in Pennsylvania and New Jersey; and the United States District Courts for the Eastern District of Pennsylvania, the District of New Jersey, and the Eastern District of Michigan.

Aaron Haleva – Senior Counsel

Aaron Haleva is Senior Counsel in the firm's Intellectual Property Department where he focuses his practice on intellectual property litigation, trademarks, and patent preparation and prosecution in various industries including healthcare, pharmaceuticals and immunology, chemical preparations and manufacture, computing systems and architectures, digital technology and coding, memory devices and interfaces, large data mining and artificial intelligence. Aaron has developed on-board interactive vision systems for mobile autonomous robots, created big data analytical tools for immunology-based patient data to predict onset of disease and severity of conditions, and has navigated the patent procurement process both as an inventor and as an attorney. Prior to joining Berger Montague, Aaron was an attorney at a national law firm.

Karen L. Handorf – Senior Counsel

Karen L. Handorf is Senior Counsel at Berger Montague and a member of the firm's Employee Benefits & ERISA practice group, where she represents the interests of employees, retirees, plan sponsors, plan participants and beneficiaries in employee benefit and ERISA cases in the district court and on appeal. Ms. Handorf brings four decades of ERISA knowledge to Berger Montague's practice, where she will focus on emergent issues in health care, with a particular focus on the actions of insurance carrier TPAs that exercise fiduciary duties under ERISA-covered health plans. Ms. Handorf also advises employers and other plan sponsors on the provisions in their administrative service agreements that might cause them to unwittingly violate ERISA or other employee benefit laws. Ms. Handorf is also focused on other legal violations related to patient health care under other (non-ERISA) federal statutes and state consumer statutes in her efforts to address the exorbitant health care costs facing most Americans.

Prior to joining Berger Montague, Ms. Handorf was a partner at another prominent plaintiffs' class action firm and the immediate-past chair and then co-chair of that firm's Employee Benefits/ERISA practice group, where she led efforts in identifying, litigating, and when necessary, appealing often

novel employee benefits issues. In that role, Ms. Handorf was one of the pioneers of the church plan litigation against organizations claiming to be exempt from ERISA due to their affiliation with or status as religious organizations.

Prior to that, Ms. Handorf had a distinguished career in government service. She spent 25 years at the Department of Labor, where, among other senior positions, she was the Deputy Associate Solicitor in the Plan Benefits Security Division. During her tenure at the Department of Labor, Ms. Handorf played a major role in formulating and litigating the Government's position on a wide variety of ERISA issues, from conception through expression in amicus briefs filed by the United States Solicitor General in the United States Supreme Court.

Matthew Hartman – Senior Counsel

Matthew Hartman is Senior Counsel in the firm's San Diego office. He primarily practices in complex litigation.

Joseph C. Hashmall – Senior Counsel

Joe Hashmall, Senior Counsel, is a member of the firm's Consumer Protection practice group. In that practice group, Mr. Hashmall primarily focuses on consumer class actions concerning financial and credit reporting practices.

Mr. Hashmall is a graduate of the Grinnell College and the Cornell University School of Law. During law school, Mr. Hashmall served as the Executive Editor of the Cornell Legal Information Institute's Supreme Court Bulletin and as an Editor for the Cornell International Law Journal. Mr. Hashmall has also worked as law clerk for President Judge Bonnie B. Leadbetter of the Pennsylvania Commonwealth Court and for the Honorable David J. Ten Eyck of the Minnesota District Court.

Mariyam Hussain – Senior Counsel

Mariyam Hussain is Senior Counsel with the Firm's Employment department. Before joining Berger Montague, Mariyam was counsel at Justice Catalyst Law, where she developed interdisciplinary impact litigation cases and legal strategies to advance economic and social justice. Prior to that, Mariyam served as a supervising attorney with Legal Aid Chicago's Immigrant and Workers' Rights Practice Group, managing a team of attorneys and paralegals in complex multi-plaintiff litigation on behalf of migrant farmworkers in Illinois. During her time with Legal Aid Chicago, Mariyam played a leading role in the filing of a federal complaint in U.S. Bankruptcy Court alleging racketeering, human trafficking, forced labor, and FLSA violations and other wrongful conduct against H-2A employers doing business under various names. Mariyam also previously worked as a senior associate doing class-action and wage-and-hour litigation at a plaintiff side law firm in New York, and as staff attorney with the New York City Commission on Human Rights.

Mariyam received her Juris Doctorate and undergraduate degrees from DePaul University and a Masters in Comparative Literature from the University of London.

J. Quinn Kerrigan – Senior Counsel

J. Quinn Kerrigan is Senior Counsel in the firm's Consumer Protection practice group. He concentrates his practice in the area of complex consumer litigation, prosecuting actions against corporate defendants and other institutions for violations of state and federal law, including state causes of action challenging unfair and deceptive practices.

Before joining the firm, Mr. Kerrigan gained notable experience litigating antitrust and consumer class actions, corporate mergers, derivative claims, and insurance coverage disputes.

Mr. Kerrigan is admitted to practice in state courts in Pennsylvania and New Jersey, the United States District Courts for the Eastern District of Pennsylvania, the Middle District of Pennsylvania, and the District of New Jersey.

Mr. Kerrigan is a graduate of Temple University's Beasley School of Law and John Hopkins University.

Joseph P. Klein – Senior Counsel

Joseph Klein is Senior Counsel in the Antitrust practice group and focuses his work on complex antitrust litigation.

David A. Langer – Senior Counsel

David A. Langer is Senior Counsel in the Antitrust practice group. He concentrates his practice in complex antitrust litigation.

Mr. Langer has had a primary role in the prosecution of the following antitrust class actions: *In re Currency Conversion Fee Antitrust Litigation* (S.D.N.Y.) (after 5½ years of litigation, through the close of fact and expert discovery, achieved a settlement consisting of \$336 million and injunctive relief for a class of U.S. Visa and MasterCard cardholders; extraordinary settlement participation from class members drawing more than 10 million claimants in one of the largest consumer antitrust class actions); *Ross and Wachsmuth v. American Express Co., et al.* (S.D.N.Y.) (\$49.5 million settlement achieved after more than 7 years of litigation and after summary judgment was denied); *Ross, et al. v. Bank of America, N.A. (USA), et al.* (S.D.N.Y.) (obtained settlements with four of the nations' largest card issuers (Bank of America, Capital One, Chase and HSBC) to drop their arbitration clauses for their credit cards for 3.5 years, and a settlement with the non-bank defendant arbitration provider (NAF), who agreed to cease administering arbitration proceedings involving business cards for 3.5 years); and *In re Linerboard Antitrust Litigation* (E.D. Pa.) (helped obtain settlements of more than \$200 million dollars).

Mr. Langer was one of the trial team chairs in the 5-week consolidated bench trial of arbitration antitrust claims in *Ross v. American Express* and *Ross v. Bank of America*, where the Honorable William H. Pauley, III of the United States District Court for the Southern District of New York, commended the "extraordinary talents of Plaintiffs' counsel."

Mr. Langer has also had a primary role in appellate proceedings, obtaining relief for his clients in a number of matters, including *Ross, et al. v. American Express Co., et al.*, 547 F.3d 137 (S.D.N.Y. 2008) (precluding an alleged co-conspirator from relying on the doctrine of equitable estoppel to invoke arbitration clauses imposed by its competitor co-conspirators); *Ross, et al. v. Bank of America, N.A. (USA), et al.*, 524 F.3d 217 (S.D.N.Y. 2008) (holding that antitrust plaintiffs possess Article III standing to challenge the defendants' collusive imposition of arbitration clauses barring participation in class actions); *In re Pharmacy Benefit Managers Antitrust Litig.*, 700 F.3d 109 (3d Cir. 2012) (finding opposing party waived the right to compel arbitration and reversing district court).

While at Vermont Law School, Mr. Langer was Managing Editor and a member of the Vermont Law Review.

Natalie Lesser – Senior Counsel

Natalie Lesser is Senior Counsel in the firm's Consumer Protection and Employee Benefits & ERISA practice groups. She concentrates her practice on automotive defect, consumer fraud, and ERISA class actions.

Before joining the firm, Ms. Lesser gained experience at both plaintiff and defense firms, litigating complex matters involving consumer fraud, securities fraud, and managed care disputes.

Ms. Lesser is admitted to practice in state courts in Pennsylvania and New Jersey, the United States District Courts for the Eastern District of Pennsylvania, the District of New Jersey, and the Eastern District of Michigan, and the United States Courts of Appeals for the Third Circuit and the Ninth Circuit.

Ms. Lesser received her law degree from the University of Pittsburgh School of Law in 2010 and her undergraduate degree in English from the State University of New York at Albany in 2007. While attending the University of Pittsburgh School of Law, Ms. Lesser was Editor in Chief of the University of Pittsburgh Law Review.

Shawn S. Li – Senior Counsel

Dr. Shawn Li is Senior Counsel in the firm's Intellectual Property Department. Dr. Li has developed global protection strategies, drafted, and prosecuted U.S. and international patent applications, prosecuted patent reexaminations, and negotiated and prepared complex licenses and related agreements. Relying on his education in the medical sciences, he provides counsel to clients in biotechnology, pharmaceutical, chemical, medical device, and other technology related industries. He also advises U.S. and multinational clients on issues related to protecting intellectual property in China, including patent, trademark, and trade secret enforcement actions, as well as cross border technology transfers and joint ventures. Prior to joining Berger Montague, Shawn gained experience working for nationally recognized law firms in Philadelphia. He has conducted patent infringement, validity, and inequitable conduct analysis and assisted in preparation for expert reports and prepared expert witnesses. Shawn worked as a postdoctoral research fellow in the department of physiology at the University of Pennsylvania School of

Medicine and as a graduate research assistant at the Skirball Institute of Biomolecular Medicine at the New York University School of Medicine.

James Maro – Senior Counsel

James Maro is Senior Counsel with the Firm's Securities department in Philadelphia. Prior to joining Berger Montague, Jim was a partner at Kessler Topaz Meltzer & Check, LLP, where he focused his practice on securities fraud and consumer protection class action litigation. Jim also represented investors in derivative, as well as mergers and acquisitions litigation. Most recently, Jim managed Kessler Topaz's "startup" department where he developed policies and practices regarding the firm's marketing efforts, potential investor and client communications, and client retention.

Jim graduated from Villanova University School of Law and received his undergraduate degree from the Johns Hopkins University.

Richard L. Moss – Senior Counsel

Richard L. Moss is Senior Counsel in the firm's Intellectual Property Department. He focuses his practice on U.S. and foreign patent prosecution matters in electrical, electromechanical, general mechanical, medical device, computer software, and process technology areas. Richard also represents and counsels clients in intellectual property litigation matters and post-grant proceedings before the U.S. Patent and Trademark Office Patent Trial and Appeal Board, as well as in business transactions involving intellectual property assets, including licensing and corporate due diligence matters.

Prior to joining Berger Montague, Richard was a Partner at a Philadelphia law firm and, before that, a Special Counsel at a prominent New York City based international law firm.

Jeffrey L. Osterwise – Senior Counsel

Mr. Osterwise pursues relief for consumers and businesses in a broad array of matters.

Mr. Osterwise litigates class actions on behalf of consumers who have been damaged by automobile manufacturers that conceal known defects in their vehicles and refuse to fulfill their warranty obligations. His experience includes actions against General Motors, Nissan North America, American Honda Motor Company, among others.

Mr. Osterwise also has substantial experience advising consumers and businesses of their rights with respect to a variety of other defective products. He has helped injured parties pursue their claims arising from defects in pharmaceuticals, solar panels, riding lawn tractors, and HVAC and plumbing products.

In addition to defective product claims, Mr. Osterwise has fought to protect consumers from unfair business practices. For example, he has represented clients deceived by their auto insurance carriers and consumers improperly billed by a national health club chain.

Mr. Osterwise also has significant experience representing the interests of shareholders in securities fraud and corporate governance matters. And, he represented the City of Philadelphia

and the City of Chicago in separate actions against certain online travel companies for their failure to pay hotel taxes.

Kerri Petty – Senior Counsel

Kerri Petty is Senior Counsel for the firm and concentrates her practice on complex litigation.

Jacob M. Polakoff – Senior Counsel

Since joining the firm in 2006, Mr. Polakoff has concentrated his practice on the prosecution of class actions and other complex litigation, including the representation of plaintiffs in consumer protection, securities, and commercial cases.

Mr. Polakoff currently represents homeowners throughout the country in various product liability actions concerning defective construction products, including plumbing and roofing. He served on the teams of co-lead counsel in two nationwide class action plumbing lawsuits: (i) against NIBCO, Inc., claiming that NIBCO's cross-linked polyethylene (PEX) plumbing tubes and component parts were defective and prematurely failed (\$43.5 million settlement), and (ii) in *George v. Uponor, Inc., et al.*, a class action about Uponor's high zinc yellow brass PEX plumbing fittings (\$21 million settlement).

He represented the shareholders of the Philadelphia Stock Exchange in *Ginsburg v. Philadelphia Stock Exchange, Inc., et al.*, in the Delaware Court of Chancery, which settled for in excess of \$99 million in addition to significant corporate governance provisions. He also is on the team of co-lead counsel representing the shareholders of Patriot National, Inc., and helped secure a \$6.5 million settlement with the bankrupt company's directors and officers.

Mr. Polakoff's experience also includes representing entrepreneurs and small businesses in actions against Fortune 500 companies.

Mr. Polakoff was selected as a Pennsylvania Super Lawyer in 2021, an honor conferred upon only the top 5% of attorneys in Pennsylvania. He was previously selected as a Pennsylvania Super Lawyer – Rising Star in 2010 and 2013-2019.

Mr. Polakoff is a 2006 graduate of the joint J.D./M.B.A. program at the University of Miami, where he was the recipient of the Dean's Certificate of Achievement in Legal Research & Writing, was awarded a Graduate Assistantship and was honored with the Award for Academic Excellence in Graduate Studies.

He holds a 2002 B.S.B.A. from Boston University's School of Management, where he concentrated in finance.

Mr. Polakoff is the Judge of Election for Philadelphia's 30th Ward, 1st Division. He was also a member of the planning committee and the sponsorship sub-committee for the Justice for All 5K from its inception. The event benefited Community Legal Services of Philadelphia, which provides free legal services, in civil matters, to low-income Philadelphians.

Geoffrey C. Price – Senior Counsel

Geoffrey C. Price is Senior Counsel in the firm’s antitrust division, specializing in complex litigation related to pharmaceuticals, investment fraud, and general anti-competitive business practices.

Richard Schwartz – Senior Counsel

Richard Schwartz is Senior Counsel in the Antitrust practice group. Mr. Schwartz concentrates his practice in the area of complex antitrust litigation with a focus on representation of direct purchasers of prescription drugs.

Prior to joining the firm, Mr. Schwartz was an attorney in the New York and Philadelphia offices of a firm where he represented plaintiffs in a variety of matters before trial and appellate courts with a focus on antitrust and shareholder class actions.

Mr. Schwartz is a member of the teams prosecuting a number of antitrust class actions on behalf of direct purchasers of prescription drugs in which the purchasers allege that generic drugs have been illegally kept off the market. Those cases include *In re Opana ER Antitrust Litigation*, No. 14-cv-10151 (N.D. Ill.); *In re Suboxone*, No. 13-MD-2445 (E.D. Pa.); *In re Solodyn*, No. 14-MD-2503 (D. Mass.) and *In re Celebrex*, No. 14-cv-00361 (E.D. Va.).

Mr. Schwartz is admitted to practice in New York, Pennsylvania, and Illinois.

Julie Selesnick – Senior Counsel

Julie S. Selesnick is Senior Counsel at Berger Montague and a member of the firm’s Employee Benefits & ERISA practice group, where she represents the interests of employees, retirees, plan sponsors, plan participants and beneficiaries in employee benefit and ERISA cases in the district court and on appeal. Ms. Selesnick’s practice is focused on health care, where she brings more than a decade of insurance coverage experience to good use focusing on the behaviors of insurance carrier TPAs that exercise fiduciary duties under ERISA-covered health plans and counseling employers and other plan sponsors on provisions in their administrative service agreements that might cause them to unwittingly violate ERISA or other employee benefit laws. Ms. Selesnick is also focused on other legal violations related to patient health care under various federal statutes and state consumer statutes to help everyday American’s bring down the out-of-control health care costs they face.

Prior to joining Berger Montague, Ms. Selesnick was of counsel at another prominent plaintiffs’ class action firm, where she practiced primarily in the ERISA group representing plaintiffs in class cases related to 401K excessive fee disputes, actuarial equivalence pension issues, church plan litigation, and cases against third-party administrators for breach of fiduciary duty in connection with their administration of ERISA-covered group health plans. Ms. Selesnick also worked in that firm’s Consumer Protection group litigating consumer class action lawsuits and policyholder insurance coverage actions on behalf of individual and class plaintiffs.

Prior to that, Ms. Selesnick was a partner at a Washington D.C. law firm in both the insurance coverage and employment law groups, where she represented carriers in insurance coverage litigation and subrogation litigation in state and federal courts throughout the United States, and represented both employers and employees in employment litigation, as well as negotiating severance agreements and reviewing and updating employee handbooks. Ms. Selesnick has first chair trial experience in jury and bench trials and has experience with arbitration and mediation of complex disputes.

Ms. Selesnick is an accomplished writer and has written numerous legal and non-legal articles and blog posts. She has also contributed to ERISA Litigation textbooks and cumulative supplements, and written materials for use in health-care litigation conferences.

Ms. Selesnick graduated with a B.A., cum laude, from the San Diego State University and was elected Phi Beta Kappa and Pi Sigma Alpha, and she received her J.D., from the George Washington University School of Law, where she was a member of the George Washington University Law Review and was inducted into the Order of the Coif.

John Timmer – Senior Counsel

John Timmer is senior counsel in the Firm's Commercial Litigation Department. Prior to joining Berger Montague, John was a partner at Schnader Harrison Segal & Lewis LLP where he focused on commercial litigation matters. John represented a manufacturer of roofing shingles and a truck manufacturer in numerous matters involving product defect claims, and also represented the School District of Philadelphia in various matters alleging breaches of contract. John also successfully represented the Philadelphia District Attorney's Office in litigation relating to an alleged "Do Not Call" list that went to trial in June 2023 in which a nonsuit was entered at the close of plaintiff's case.

Prior to working at Schnader Harrison, John worked at the Hoyle Law Firm, where he represented defendants in class actions involving defective roofing shingles and violations of the Driver's Privacy Protection Act, and where he was counsel for a receiver charged with recovering money for defrauded investors in a Ponzi scheme. John started his career at Pepper Hamilton (now Troutman Pepper) where he represented pharmaceutical and medical device companies.

John has represented numerous pro bono clients, including on behalf of incarcerated individuals asserting civil rights claims and on behalf of tenants in landlord-tenant court. John graduated from Wake Forest University and Vanderbilt Law School.

Zachary M. Vaughan – Senior Counsel

Zach Vaughan is Senior Counsel who works with the Firm's consumer department remotely from New York. Prior to joining Berger Montague, Zach was an associate at Scott+Scott Attorneys at Law LLP in New York, where he represented institutional and retail investors in securities class actions under the '33 and '34 Acts. Prior to that, Zach

was a general commercial litigator at Patterson Belknap Webb & Tyler LLP, also in New York.

Zach graduated from the Georgetown University Law Center in 2011. Before beginning his career as a litigator, he served as a law clerk to Judge D. Michael Fisher of the U.S. Court of Appeals for the Third Circuit in Pittsburgh and to Judge Colleen McMahon of the U.S. District Court for the Southern District of New York.

Lane L. Vines – Senior Counsel

Lane L. Vines's practice is concentrated in the areas of securities/investor fraud, consumer and *qui tam* litigation. For more than 17 years, Mr. Vines has prosecuted both class action and individual opt-out securities cases for state government entities, public pension funds, and other large investors. Mr. Vines also represents consumers in class actions involving unlawful and deceptive practices, as well as relators in *qui tam*, whistleblower and False Claims Act litigations. Mr. Vines is admitted to practice law in Pennsylvania, New Jersey and numerous federal courts.

Mr. Vines also has experience in the defense of securities and commercial cases. For example, he was one of the firm's principal attorneys defending a public company which obtained a pre-trial dismissal in full of a proposed securities fraud class action against a gold mining company based in South Africa. See *In re DRDGold Ltd. Securities Litigation*, 05-cv-5542 (VM), 2007 U.S. Dist. LEXIS 7180 (S.D.N.Y. Jan. 31, 2007).

During law school, Mr. Vines was a member of the Villanova Law Review and served as a Managing Editor of *Outside Works*. In that role, he selected outside academic articles for publication and oversaw the editorial process through publication.

Prior to law school, Mr. Vines worked as an auditor for a Big 4 public accounting firm and a property controller for a commercial real estate development firm, and served as the Legislative Assistant to the Minority Leader of the Philadelphia City Council.

Mr. Vines has achieved the highest peer rating, "AV Preeminent" in Martindale-Hubbell for legal abilities and ethical standards. Mr. Vines is admitted to practice law in Pennsylvania, New Jersey and several federal courts.

William Walsh – Senior Counsel

William Walsh is Senior Counsel within the Environmental Department. Prior to joining Berger Montague, he was part of the environmental team at Weitz & Luxenberg for 16 years. There, Will played a significant role representing several states and municipal water providers in actions against polluters for groundwater contamination. He was also directly involved in PFOA/PFOS litigation and the Roundup litigation, representing individuals who developed non-Hodgkin's lymphoma from their exposure to glyphosate.

Will graduated from Haverford College with a degree in political science and worked as a legislative assistant on a Senate staff for two years before attending law school. At the University of Minnesota Law School, Will assisted in the rewriting of the law school's Honor Code and was a member of the Minnesota Law Review and served as a moot court director.

Dena Young – Senior Counsel

Dena Young is Senior Counsel in the firm's Consumer Protection practice group. She concentrates her practice in the area of complex consumer litigation, prosecuting actions against pharmaceutical and product manufacturers for violations of state and federal law.

Before joining the firm, Dena worked for prominent law firms in the Philadelphia region where she worked on personal injury and mass tort cases involving dangerous and defective medical devices, pharmaceutical, and consumer products including Talcum Powder, Transvaginal Mesh, Roundup, Risperdal, Viagra, Zofran, and Xarelto. She also assisted in the prosecution of cases on behalf of the U.S. Government and other government entities for violations of federal and state false claims acts and anti-kickback statutes.

Recently, the Honorable Brian R. Martinotti appointed Dena to serve on the plaintiffs' steering committee (PSC) of MDL 2921 in the *Allergan BIOCELL Textured Breast Implant Products Liability Litigation*, situated in the United States District Court for the District of New Jersey. In this case, Dena represents plaintiffs diagnosed with breast implant associated anaplastic large cell lymphoma (BIA-ALCL), a deadly form of cancer caused by Allergan's textured breast implants.

Early in her legal career, Dena represented clients diagnosed with devastating asbestos-related diseases, including mesothelioma and lung cancer. Cases she handled resulted in millions of dollars in settlements for her clients.

During law school, Dena represented defendants in preliminary hearings and misdemeanor trials while working for the Defender Association of Philadelphia. She also clerked for the Animal Protection Litigation section of the United States Humane Society. In 2008-2009, Young worked for the Honorable Renee Cardwell Hughes of Philadelphia's Court of Common Pleas.

In 2010, she received her Juris Doctor degree, with honors, from Drexel University's Thomas R. Kline School of Law where she founded the School's Student Animal Legal Defense Fund chapter.

Dena is admitted to practice in state courts in Pennsylvania and New Jersey, the U.S. District Court for the Eastern District of Pennsylvania, and the U.S. District Court for the District of New Jersey.

Associates

Michael Anderson – Associate

Michael Anderson is an Associate in the Wage and Hour department based out of the Firm's Philadelphia office. Michael graduated cum laude from William & Mary Law School and was recognized for his work in public service. Michael represented his third-year class on the Student Bar Association, participated in the Leadership Institute, and served as a member of the William & Mary Journal of Race, Gender, and Social Justice.

During law school, Michael completed two federal judicial externships with the Hon. Raymond A. Jackson and the Hon. John A. Gibney in the Eastern District of Virginia. In his final year, Michael spent much of his time advocating for students with disabilities through William & Mary's Special Education Advocacy Clinic. In the clinic, Michael counseled families, represented clients at special education meetings, and negotiated with school districts to provide appropriate special education services under the Individuals with Disabilities Education Act (IDEA). Michael also worked as a law clerk at Victor M. Glasberg & Associates, where he assisted the firm with litigating complex civil rights cases involving law enforcement misconduct, police brutality, and employment discrimination under federal laws.

Prior to law school, Michael worked as the Director of Auxiliary Programs and taught a high school philosophy course at a nationally recognized charter school in southern Arizona.

Robert Berry – Associate

Robert Berry is with the Firm's Antitrust department in Philadelphia. Robert graduated Magna Cum Laude from the University of Pennsylvania Carey Law School in May 2022. At Penn, Robert served on the editorial board of the University of Pennsylvania Journal of Law and Public Affairs as Research Editor. Robert was heavily engaged in clinic programs, directly representing clients in landlord-tenant disputes, social security matters, and asylum-seeking matters with the Civil Practice Clinic and the Transnational Legal Clinic. Robert also worked heavily with Professor Herbert Hovenkamp on antitrust matters, taking two separate antitrust classes from the professor, serving as the professor's antitrust TA during the summer of 2021, and working with the professor on an independent study project examining the current state of horizontal merger law.

Prior to law school, Robert graduated from Cornell University with a bachelor's degree in history with a minor in classical civilizations. While at Cornell Robert was inducted into the Phi Beta Kappa honor society for academic excellence.

Laurel Boman – Associate

Laurel Boman is an associate with the Firm's antitrust department in Philadelphia. Laurel returned to Berger Montague after being a summer associate at the Firm in 2020. Upon graduating from NYU School of Law in 2021, Laurel clerked for the Honorable Richard G. Andrews in the District of Delaware and the Honorable Timothy B. Dyk at the U.S. Court of Appeals for the Federal Circuit.

At NYU, Laurel was involved in the Law Review as an Executive Editor, the Herman Biggs Society (a health policy lecture series), and the Technology Law & Policy Clinic. With the Clinic, Laurel co-authored the white paper Clinical Trial Cost Transparency at the National Institutes of Health: Law and Policy Recommendations, which sets forth recommendations to achieve greater transparency into the costs of pharmaceutical research and development. During law school, Laurel also worked as a research assistant for Rhochelle Dreyfuss and interned with Knowledge Ecology International in Washington, D.C. At NYU, Laurel was a Pomeroy Scholar, a Florence Allen Scholar, and graduated magna cum laude.

Laurel received her Bachelor's degree in Classics from Gustavus Adolphus College in St. Peter, MN.

Grace Ann Brew – Associate

Grace Ann Brew is an Associate in the Antitrust group at the Firm's Philadelphia office. Before joining the Firm, Grace Ann clerked for the Honorable Maryellen Noreika in the United States District Court for the District of Delaware. Grace Ann is a graduate of Stanford Law School, where she received high pro bono distinction for her work with various organizations including Legal Aid at Work and the ACLU of Pennsylvania. She earned the Judge Thelton E. Henderson Prize for Outstanding Performance for her work in Stanford's Juelsgaard Intellectual Property and Innovation Clinic. While in law school, Grace Ann worked as a summer associate at a civil rights litigation firm specializing in prisoners' rights class actions and interned for the Los Angeles City Attorney's Civil Litigation Branch. Grace Ann served as a member of the Stanford Law Review and a managing editor of the Stanford Journal of Civil Rights & Civil Liberties.

Grace Ann completed her undergraduate degree at Pomona College, where she studied English and Classics.

Hope Brinn – Associate

Hope Brinn is an Associate in the firm's Antitrust group. Prior to joining the firm, Ms. Brinn clerked for the Honorable Janet Bond Arterton in the District of Connecticut. Ms. Brinn graduated from the University of Michigan Law School, where she was a senior editor for the Michigan Law Review, and the executive notes editor for the Michigan Journal of Race & the Law.

Prior to law school, Ms. Brinn worked at The Philadelphia School and Breakthrough of Greater Philadelphia.

William H. Fedullo – Associate

William H. Fedullo is an Associate in the firm's Philadelphia office, practicing in the Whistleblower, *Qui Tam* & False Claims Act group, which has collectively recovered more than \$3 billion for federal and state governments, as well as over \$500 million for the firm's whistleblower clients. Mr. Fedullo represents whistleblowers in active litigation throughout the country. He also assists in the pre-litigation investigation and evaluation of potential whistleblower claims.

Prior to joining the firm, Mr. Fedullo was a commercial litigation associate at a large full-service Philadelphia law firm. His practice there focused on protecting small businesses that had been the victims of usurious “merchant cash advance” lending practices. He also took an active role in franchisee rights litigation in the hospitality industry. He served as lead associate in numerous state and federal litigations as well as AAA and JAMS arbitrations. His accomplishments included primarily authoring briefs that obtained critical injunctive relief in bet-the-business arbitration; primarily authoring dispositive and appellate briefs in parallel state and federal actions against one of the largest debt collection companies in the world, resulting in a federal court denying a motion to dismiss a consumer’s Fair Debt Collections Practices Act claims; and authoring a complaint brought by over ninety hotel franchisees against a prominent international hotel franchisor. Additionally, Mr. Fedullo played key roles in several other cases that resulted in favorable verdicts or settlements for his clients.

Mr. Fedullo received a Bachelor of Arts from Swarthmore College with High Honors, with a major in Philosophy and minor in English Literature. He graduated from the University of Pennsylvania Law School *cum laude*. In law school, he was an executive editor of the Penn Law Journal of Constitutional Law, where he published a Comment, “Classless and Uncivil.” He also worked as a research assistant for the reporter for the forthcoming Restatement (Third) of Conflicts of Law, and as a teaching assistant at the Wharton School of Business for the undergraduate class “Constitutional Law and Free Enterprise.” He was the recipient of the 2019 Penn Law Fred G. Leebron Memorial Prize for Best Paper in Constitutional Law for his paper “Original Public Meaning Originalism and Women Presidents.” Finally, he received honors from both the Philadelphia Bar Association and Penn Law for his involvement in pro bono activities, which included serving as a board member for the Custody and Support Assistance Clinic, a student-run organization that provides legal assistance to low-income Philadelphians facing family law issues; working on low-income housing and utility issues at Community Legal Services; and working as a certified legal intern in the Civil Practice Clinic, litigating several cases for low-income Philadelphians before the Philadelphia Court of Common Pleas.

Mr. Fedullo is admitted to practice law in the state courts of the Commonwealth of Pennsylvania as well as the United States District Court for the Eastern District of Pennsylvania.

Kyla Gibboney – Associate

Kyla Gibboney is an Associate with the Firm’s antitrust department in San Francisco. Kyla joined Berger Montague from Gibbs Law Group LLP, where she prosecuted antitrust, consumer protection, and securities class actions on behalf of plaintiffs harmed by corporate and government misconduct. During her time at Gibbs, Kyla was part of trial teams that successfully enforced a provision of the California Constitution against two water districts in Southern California. In 2023, she won the California Attorney Lawyer of the Year Award, which recognizes outstanding California lawyers “whose extraordinary work and cases had a major impact on the law,” for her work on those cases.

Prior to joining Gibbs, Kyla spent five years as an associate at the Joseph Saveri Law Firm. While there, Kyla litigated primarily antitrust class actions, including cases challenging “reverse

payment” settlement agreements between pharmaceutical companies in In re Lidoderm Antitrust Litigation and In re Cipro Cases I & II. In addition to her antitrust work, she also represented content moderators impacted by harmful conduct on Facebook in a case that resulted in a fund being established to provide mental health services for affected workers.

Kyla graduated from University of California College of the Law in San Francisco. During law school, she was active in the pro bono community, competed with, coached, and was as a board member of the moot court team, and served as the Executive Articles Editor of the UC Law Constitutional Law Quarterly. Kyla also spent a semester as an extern with the Antitrust Division of the Department of Justice and completed two judicial externships.

Kyla is currently an executive committee member of the California Lawyers’ Association’s Antitrust and UCL section.

Jeremy Gradwohl – Associate

Jeremy is an Associate in the Antitrust group at the Firm’s Philadelphia office.

Before joining the Firm, Jeremy clerked for Judge Harvey Bartle III of the United States District Court for the Eastern District of Pennsylvania.

Jeremy is a graduate of Temple University Beasley School of Law’s evening program. During law school, he served as an intern with the American Civil Liberties Union of Pennsylvania as well as for Judges Michael A. Shipp of the United States District Court for the District of New Jersey and Cheryl Ann Krause of the United States Court of Appeals for the Third Circuit. He represented noncitizens in Third Circuit immigration appeals through the Federal Appellate Litigation Clinic. He was also a member of the Temple Law Review editorial board.

Before law school, Jeremy worked as a constituent services representative for a member of Philadelphia City Council.

Taylor Hollinger – Associate

Taylor is in the Firm’s Antitrust group in the Philadelphia office. Taylor is a recent graduate of Georgetown Law. There, Taylor was an Articles Editor with The Georgetown Law Journal and Treasurer for the First Generation Student Union. During her time as a law student in D.C., Taylor externed with the Division of Enforcement of the CFTC, the Bureau of Competition of the FTC, and the Antitrust Division of the DOJ. Taylor received her undergraduate degree from Pitzer College in Claremont, California, with a major in Creative Writing.

Najah Jacobs – Associate

Ms. Jacobs is an Associate in the firm’s Consumer Protection & ERISA Departments.

Prior to joining Berger Montague, Najah Jacobs was an associate at Stevens & Lee, P.C., where she focused her practice on commercial litigation matters with an emphasis on litigation involving financial products and representation of broker-dealers in FINRA arbitration matters related to the

purchase and sale of securities and insurance products. Prior to that, Najah was an associate at a large New Jersey law firm, where she defended large oil companies in complex statewide environmental litigation. During her time there, Najah played a major role in formulating a defense strategy and obtaining a favorable disposition for the City of Philadelphia in a constitutional rights case brought by the Fraternal Order of Police over an alleged “do not call list.”

Najah graduated from Drexel University Thomas R. Kline School of Law, where she was an active leader. Najah served as the President of the Black Law Students Association, a Law School Ambassador, a Diversity and Inclusion Fellow, and as a Marshall Brennan Constitutional Literacy Fellow, where she taught high school students about their constitutional rights. Najah was also the Executive Symposium Editor of the Drexel Law Review and a competitor on Drexel’s nationally recognized Trial Team, leading the group to back-to-back victories in national mock trial competitions against some of the nation’s top law schools. During law school, Najah served as a judicial extern for the Honorable Robert B. Kugler of the United States District Court for the District of New Jersey and also served as an intern for the Philadelphia District Attorney’s Office. At graduation, Najah received the Faculty Award for Contributions to the Intellectual Life of the Law School and the Thomas R. Kline School of Law Trial Team Award for Outstanding Advocacy.

Najah is currently an adjunct faculty member at the Kline School of Law, serving as a coach and mentor for teams competing in national trial advocacy competitions. In her spare time, Najah enjoys playing basketball, mentoring high school and college students, and hosting events for her non-profit organization, which focuses on giving back to underserved communities.

Ariana B. Kiener – Associate

Ariana B. Kiener is an Associate in the firm’s Minneapolis office and practices in the firm’s Consumer Protection group.

Before joining the firm, Ms. Kiener worked for several years in education, first as a classroom teacher (through a Fulbright Scholarship in Northeastern Thailand) and eventually as the communications director for an education advocacy nonprofit organization. While in law school, she clerked at the Firm and served as a Certified Student Attorney and Student Director with the Mitchell Hamline Employment Discrimination Mediation Representation Clinic.

Olivia Lanctot – Associate

Olivia Lanctot is an Associate with the Firm’s Wage and Hour department in Philadelphia. Prior to joining Berger Montague, she was an associate at Comegno Law Group in Moorestown, NJ, where she focused her practice on education and employment law.

Olivia received her law degree from William & Mary Law School and her B.A. from Gettysburg College.

During law school, she was heavily involved with William & Mary’s Special Education Advocacy Clinic, where she negotiated with school districts to provide students with the appropriate accommodations and services necessary to access their education. During her final year, Olivia

also worked as a law clerk for a plaintiffs' employment litigation firm, assisting with employee rights violations and discrimination cases before the Equal Employment Opportunity Commission (EEOC) and the Merit Systems Protection Board (MSPB).

Julia McGrath – Associate

Julia McGrath is an Associate in the firm's Antitrust practice group. She represents consumers, businesses, and public entities in complex class action litigation, prosecuting anticompetitive conduct such as price-fixing, bid-rigging, and illegal monopolization.

Ms. McGrath has challenged anticompetitive conduct in a variety of industries, including the single-serve coffee industry in *In Re Keurig Green Mountain Single-Serve Antitrust Litigation*; the pharmaceutical industry in *In Re: Ranbaxy Generic Drug Application Antitrust Litigation* (D. Mass) and *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation* (E.D. Pa.); and the financial industry in *In re London Silver Fixing Ltd. Antitrust Litigation* (S.D.N.Y.) and *In re: GSE Bonds Antitrust Litigation* (S.D.N.Y.).

Prior to law school, Ms. McGrath had a successful career in government and politics. She worked on political campaigns at the local, state, and federal level. She's advised top-tier congressional, gubernatorial, and U.S. Senate candidates in Pennsylvania and New Jersey and served as the Finance Director for U.S. Senator Bob Casey. In 2013, she was appointed by President Obama to serve as Special Assistant to the Mid-Atlantic Regional Administrator of the U.S. General Services Administration.

Ms. McGrath earned her J.D., *cum laude*, from Temple University Beasley School of Law and her B.A. in History from Boston University.

Marika O'Connor Grant – Associate

Marika O'Connor Grant is an Associate with the Firm's consumer department in its Minneapolis office. Prior to joining Berger Montague, Marika worked as an Associate at Tycko & Zavareei LLP, where she focused on consumer, appellate, and False Claims Act cases. Most notably, while at TZ, Marika worked on a class-action suit against Facebook for tracking users' location without their consent; a case brought by the District of Columbia against major oil companies for deceiving DC consumers regarding the existence of climate change and for misrepresenting the environmental friendliness of the companies' products; and a case against USC for misrepresenting its online graduate program. Prior to joining TZ, Marika served as a Law Clerk for the Honorable Wilhelmina M. Wright on the United States District Court for the District of Minnesota, worked as an Associate in Cooley LLP's general litigation practice group, and served as a Vetting Attorney for the Biden-Harris Administration's Transition Team.

Marika graduated from Stanford Law School with high pro bono distinction. While at Stanford, Marika worked in the Immigrants' Rights Clinic and volunteered with the Economic Advancement Pro Bono Project. While at SLS, Marika also served as a Research Assistant to Professor Michelle Wilde Anderson, analyzing local governments' novel efforts to address poverty, and as a Teaching Assistant to Professor Keith Hennessey at the Stanford Graduate School of Business.

While in law school, Marika served as a board member of Women of Stanford Law and as the Technical Managing Editor of the Stanford Journal of Civil Rights and Civil Liberties. Marika spent her 2L summer working at Debevoise & Plimpton LLP, where she contributed to abortion impact litigation cases, assisted on data-privacy and cybersecurity matters, and first-chaired the appeal of the Social Security Administration's denial of disability benefits for a pro bono client. Marika spent her 1L summer as the Janet D. Steiger Fellow in the Consumer Protection Division at the Massachusetts Attorney General's Office, where she worked on data-breach enforcement actions and investigations; fair-lending investigations; enforcement actions against for-profit schools; and the MA AGO's response to the Department of Education's Borrower Defense rulemaking.

Before law school, Marika worked as a paralegal for three years. Marika first worked as a paralegal for two years at the civil rights impact litigation firm Relman Colfax PLLC and then spent another year working as a paralegal at what was then Harvard Law School's Project on Predatory Student Lending. Marika earned her undergraduate degree at Carleton College.

Amey J. Park – Associate

Amey J. Park is an Associate in the firm's Philadelphia office and practices in the firm's Consumer Protection and Commercial Litigation practice groups.

Before joining the firm, Ms. Park was an associate in the litigation department of a large corporate defense firm. She represented corporate and individual clients in complex commercial litigation, product liability, and personal injury matters in a wide variety of industries, including financial services, insurance, trust administration, and real estate. Ms. Park also represented clients *pro bono*, serving as first-chair counsel in a federal jury trial for violations of an inmate's constitutional rights by law enforcement officers and assisting a young refugee seeking asylum in federal immigration court.

Ms. Park is admitted to practice in state courts in Pennsylvania and New Jersey; the United States District Courts for the Eastern District of Pennsylvania, the Middle District of Pennsylvania, and the District of New Jersey; and the United States Court of Appeals for the Third Circuit.

Julie Pollock – Associate

Julie Pollock is part of the Firm's San Francisco Bay Area office in the Antitrust Department.

Julie graduated summa cum laude from USF School of Law. While in law school, Julie clerked in the Firm's Antitrust Department, and served as a judicial extern to Chief Justice Cantil-Sakauye of the California Supreme Court. Julie also served on the Board of Directors for the Legal Aid Association of California, advocating to expand access to critical legal services for low-income Californians.

Julie is passionate about social and economic justice. Prior to joining the firm, she earned a Master's Degree in Social Welfare from UCLA, and started her career doing policy work to improve healthcare and housing access for low-income older adults. Julie believes in aggressive

antitrust enforcement as a tool to combat the excessive concentration of economic power and its resulting structural inequities.

Radha Raghavan – Associate

Radha Raghavan is an associate with the Firm's Consumer Department. Prior to joining Berger Montague, Radha was an associate at Wolf Popper LLP, where she focused her practice on consumer fraud, healthcare and securities class action litigation representing clients in state and federal courts across the country. Prior to that, Radha worked with well-respected dispute resolution firms in India and New York focusing on international disputes. At these firms, she represented clients in both international commercial and investor-state arbitrations under the ICC and UNCITRAL rules respectively.

Radha graduated from University Law College, Bangalore University with a law degree (BA.L., LL.B.) in 2014, where she was valedictorian for the Bachelor of Academic Law (BA.L.) program. Subsequently, Radha received her masters of law degree (LL.M.) from NYU in 2015. After her LL.M., Radha served as a judicial extern for Judge Gerald Lebovits at the New York State Supreme Court.

Sophia Rios – Associate

Sophia Rios is an associate in the firm's San Diego office and practices in the Consumer Protection and Antitrust practice groups.

Before joining the firm, Sophia was an associate in the litigation department of a large international law firm. She represented corporate and individual clients in consumer protection, complex commercial litigation, securities, and Americans with Disabilities Act (ADA) matters. In her pro bono practice, Sophia assisted refugees seeking asylum in the United States.

Sophia is committed to furthering diversity and inclusion in law firms. She serves on the firm's Diversity, Equity & Inclusion Task Force. Sophia has also participated in the Leadership Council on Legal Diversity's Pathfinder Program.

While at Stanford Law School, Sophia served as an extern Legal Adviser in the Office of Commissioner Julie Brill at the Federal Trade Commission in Washington, DC. Sophia co-founded the Stanford Critical Law Society, which serves as a student forum for the discussion of the relationship between law and race. Sophia was a Lead Article Editor for the Stanford Environmental Law Journal.

Before beginning law school, Sophia attended UC Berkeley and served as an intern on the White House Council of Environmental Quality. She is a first-generation college student and a San Diego native.

Joseph Samuel – Associate

Joseph Samuel is an Associate in the Intellectual Property department, where he focuses his practice on patent, trademark, copyright, and trade secret litigation.

Joe is licensed to practice in Pennsylvania and California. He earned his J.D. degree, magna cum laude, from Villanova University Charles Widger School of Law, where he was elected to the Order of the Coif. Joe served as an editor and staff writer of the Villanova Law Review and as a judicial extern to the Honorable Elizabeth T. Hey in the Eastern District of Pennsylvania. He also worked in Villanova's Federal Tax Clinic, where he represented low-income taxpayers in IRS assessment and collections matters before the United States Tax Court.

Before becoming a lawyer, Joe worked as a political consultant for campaigns at the federal, state, and local level. He has experience advising clients on Pennsylvania election law issues.

Counsel

Zubair Ahmad – Counsel

Zubair Ahmad is Counsel with the Antitrust department in the Philadelphia office. He has extensive experience with e-discovery in large scale litigation and has also spent time as associate in-house counsel with a developer of ambulatory surgical centers as well as a large regional hospital.

Mr. Ahmad graduated from the University of Michigan Law School where he was a member of the Journal of Law Reform. He received his undergraduate degree from Franklin & Marshall College where he was pre-med with a physics and sociology double major.

Caitlin Adorni – Counsel

Caitlin works at the Firm as Counsel. Prior to joining the team at Berger Montague, her professional experience included work at JP Morgan Chase as well as CBS/Showtime Networks in New York City. Her professional background is focused on corporate and securities litigation. Additionally, with the rise in AI technology being utilized within the legal profession, she recently completed a professional certification in Artificial Intelligence (AI) Strategy and utilizes this education and knowledge with the Firm's Antitrust group.

Alexandra Antoniou – Counsel

Alexandra Antoniou is an attorney in the firm's Philadelphia office, and works in the firm's Auto Defect practice area.

David Catherine – Counsel

David M. Catherine is Counsel with the Firm's Antitrust department in Philadelphia. Prior to joining Berger Montague, David was an Attorney in a boutique law firm, representing numerous plaintiffs in class-action pharmaceutical antitrust litigation, specializing in electronic discovery as well as legal research and deposition preparation. Prior to that, David was a Project Attorney at a large American multinational firm, representing clients in pharmaceutical products liability multi-district

litigation, specializing in discovery and evidentiary preparation. Before that, David spent several years assisting several firms throughout the Philadelphia region with various aspects of discovery, legal research and litigation preparation.

David graduated from Syracuse University College of Law, where he also served in the Criminal Law Clinic, representing indigent clients in Syracuse City Court. David also graduated from Duquesne University, earning a Bachelor of Arts with a major in English while also serving in the Student Government Association and as an Officer in the National Service Fraternity, Alpha Phi Omega.

James Christensen – Counsel

James Christensen is Counsel in the Firm's Antitrust department. He possesses expertise across various legal domains, with a particular focus on eDiscovery. In this capacity, he offers solutions for complex managed reviews and litigation preparation, with a specific emphasis on antitrust/M&A, financial and securities regulations, internal investigations, and FTC/DOJ 2nd Requests.

Previously, during his tenure as Enforcement Counsel at the Chicago Stock Exchange (CSE), Jim conducted investigations into potential violations of federal securities laws, prosecuted disciplinary matters, and oversaw the arbitration program, which included the issuance of Wells Notices. Before his time at the CSE, Jim served as an Associate Attorney at a mid-sized firm, where his practice revolved around general civil litigation.

Jim obtained his Juris Doctor from the John Marshall Law School in Chicago, Illinois, and during his time there, he served as a Staff Editor on the Journal of Information Technology & Privacy Law. He also holds a Bachelor of Arts in Economics and English from the University of Wisconsin-Madison.

Carl Copenhaver – Counsel

Carl Copenhaver is Counsel in the Firm's Antitrust Department. Carl has almost 18 years of experience in complex securities and antitrust class action litigation as a discovery specialist. Over that span, he has worked independently, and later through his own discovery firm, with a wide variety of firms on a range of cases assisting in discovery and evidentiary-related matters.

Mr. Copenhaver received his Bachelor of Arts with Scholastic Distinction in History and a concentration in African American Studies from Carleton College, graduating magna cum laude. He was a member of the Mortar Board National Honor Society and was a nationally ranked member of the tennis team while winning multiple All-Conference Awards.

Mr. Copenhaver attended The George Washington University Law School where he was a Murray Snyder Public Interest Fellow and worked with local and national civil rights organizations on Fair Housing issues.

Cate Crowe – Counsel

Cate Crowe is Counsel in the Firm's antitrust department. She joined Berger Montague from Lockridge Grindal Nauen P.L.L.P. where her practice focused on private enforcement of antitrust laws against price fixing cartels and pay-for-delay schemes. Cate has supported plaintiff-side discovery and trial teams in complex consumer fraud, data breach, and antitrust litigations. She

has experience identifying and vetting damages experts, mining evidence from document databases and phone records, and synthesizing evidence to develop narratives of overarching conspiracies for depositions and trial.

Cate also managed large-scale document reviews and is comfortable drafting coding instructions, administering document databases, and supervising coders. Before that, she operated a general litigation practice in Iowa where she practiced family law, juvenile law, and criminal defense.

Cate is active in Complex Litigation E-Discovery Forum and with the Committee to Support the Antitrust Laws.

Stephen Federbusch – Counsel

Stephen Federbusch is counsel in the Antitrust department, with a focus on eDiscovery. Prior to joining Berger Montague, Stephen was a Staff Attorney at Simpson Thacher & Bartlett, LLP, where he worked in Discovery on numerous high-profile cases, specifically on shareholder class action suits and DOJ Second Requests. Prior to that, Stephen worked as a Family Law and Real Estate Attorney at Federbusch & Weinstein in New Jersey. Additionally, he has been an attorney for various independent production companies, writers, and actors, having negotiated licensing agreements, partnership agreements, option agreements and other entertainment related contracts.

Stephen graduated from Yeshiva University's Cardozo School of law. During law school, Stephen interned at the Legal Department for BBC American, and worked as a Contract Analyst for Universal Music Group, where he reviewed recording agreements and producer agreements, specifically focusing on Universal's rights in new digital formats.

Stephen graduated from New York University's Tisch School of the Arts, with a degree in Film/Theater.

Dominic Gallucci – Counsel

Dominic Gallucci is Counsel with the Firm's Antitrust Department. Prior to joining Berger Montague, Dominic worked contractually on many discovery matters, serving in leadership and fact development roles; these included several 2nd Request merger productions and complex antitrust litigations. Prior to that, Dominic conducted research for and edited two books for Judge Scott Hempling, pertaining to public utility mergers and regulation. Before that, Dominic worked with a small DC-based practice, gaining experience with class action and consumer protection matters.

At Georgetown University Law Center, Dominic co-founded and served as Treasurer for Georgetown Law Students for Democratic Reform, and contributed to the American Constitutional Society and National Lawyers Guild. There he also took significant antitrust coursework, including: Antitrust Economics and Law, International Antitrust Law, Advanced Antitrust Economics and Law Seminar, and Hot Topics in Antitrust Seminar.

Dominic is currently providing pro bono assistance to U-visa applicants with the Northwest Immigration Rights Project, and detained asylum-seekers with the Immigration Justice Project.

Clare Kirui – Counsel

Clare Kirui is Counsel practicing in the Firm's Antitrust practice group. Clare has extensive experience working in eDiscovery. Prior to joining Berger Montague, she worked on eDiscovery reviews and managed complex review projects. Clare has extensive experience conducting fact development for large-scale litigations, culling through large volumes of documents and analyzing and summarizing pertinent factual findings for relevance to legal issues.

Clare has served in an eDiscovery project management role during various phases of litigation. Clare has worked on multiple Antitrust matters conducting fact development for depositions, expert discovery, and trial preparation.

Clare is a California licensed attorney. She received her undergraduate degree from UCLA and earned her J.D. from the George Washington University Law School.

Daniel E. Listwa – Counsel

Daniel E. Listwa has worked on a number of antitrust matters, with a focus on the suppression of generic competition by major pharmaceutical manufacturers. Before joining the firm, Mr. Listwa clerked for the Honorable J. Brian Johnson of the Lehigh County Court of Common Pleas, and was an associate at a medical malpractice defense firm in Blue Bell, PA. While in law school, Mr. Listwa was a staff writer for the Boston College Environmental Affairs Law Review, and interned at the U.S. District Court for the Eastern District of Pennsylvania.

Ivy Marsnik – Counsel

Ivy L. Marsnik is a litigation attorney based out of the Firm's Minneapolis office where she focuses her current practice on representing individuals who have been harmed by violations of the Fair Credit Reporting Act.

Prior to joining Berger Montague, Ms. Marsnik worked on behalf of individual plaintiffs at a premier employment and civil rights law firm and in several legal counsel positions at the Minnesota state legislature. She has also provided legal services to individual clients at Tubman, a nonprofit serving survivors of domestic violence, and at a University of Minnesota Law School clinic where she worked primarily as an advocate for tenants' rights.

Elaine Oldenettel – Counsel

Elaine Oldenettel is Counsel with the Firm's Antitrust department. Prior to joining the Firm, Elaine was a staff attorney at Kessler Topaz Meltzer & Check, LLC, where she focused her practice on pharmaceutical antitrust litigation.

Elaine received her law degree from University of Maryland Francis King Carey School of Law and her undergraduate degree from University of Oregon. While in law school, she interned at the United States Court of Federal Claims and the Circuit Court for Baltimore City.

Bryan Plaster – Counsel

Bryan L. Plaster is based out of the Firm's Minneapolis office and serves as Counsel to the Credit Reporting and Background Checks practice group. Prior to joining Berger Montague, Bryan was employed as in-house counsel through a fellowship with SICK, Inc., an international manufacturer of industrial sensor technology. During his time at the University of Minnesota Law School, he served as a Student Attorney in the Consumer Protection Clinic, clerked at a mid-sized commercial litigation firm, and completed two judicial internships.

Bryan graduated cum laude from the University of Minnesota Law School and completed a B.A. with distinction in Economics and Geography at the University of Wisconsin-Madison. Prior to embarking on a career in law, he spent five years in a variety of positions in the technology industry, including leadership roles in a late-stage startup where, in part, he assisted in guiding the company through various stages of growth and acquisition.

Lara Sawczuk – Counsel

Lara Sawczuk has joined the Firm as counsel within the Antitrust practice group. Lara has extensive experience with e-discovery, and brings with her a dedicated and thoughtful approach to all stages of the discovery process. She served as a discovery staff attorney at a prominent law firm in New York City, where she worked on large scale litigation including antitrust cases, bankruptcy cases, and class action lawsuits. She has helped firms with a wide range of discovery needs, including document productions, witness preparation, and quality control.

Lara received her undergraduate degree from New York University and earned her J.D. from Brooklyn Law School. Upon graduating from Brooklyn Law, she began her career with a judicial clerkship in the New York State Supreme Court, Civil Term. She is admitted to practice in New Jersey and New York.

Shannon Sawyer – Counsel

Shannon is Counsel with the Firm's Antitrust department. She earned her undergraduate degree from Purdue University and her Juris Doctorate degree from Loyola New Orleans College of Law. While in law school, Shannon worked at the Louisiana Supreme Court Office of Special Counsel and the United States Attorney's Office (EDLA) in New Orleans, Louisiana. She also clerked for the Allen County Public Defender's Office in Fort Wayne, Indiana.

Shannon's practice has included numerous complex litigations nationwide, including: In re Taxotere (Docetaxel) Products Liability Litigation (E.D. LA), and In re Broiler Chicken Grower Litigation (E.D. Okla.). Shannon is licensed to practice in Louisiana and Indiana and focuses her practice on securities fraud and antitrust litigation.

Alston Slay – Counsel

Prior to joining Berger Montague, Alston was an eDiscovery Attorney at Motley Rice, where he worked on multiple large-scale eDiscovery projects, including the ongoing litigation between states and major opioid manufacturers and distributors. Alston concurrently assisted a small law

firm in Greensboro, North Carolina, with a diverse range of personal injury matters. Over the course of his career, Alston has developed extensive knowledge of eDiscovery tools, expertise in constructing case narratives through document review and analysis, and best practices in the use of legal technology in large, complex case settings.

Alston graduated from Charleston School of Law in Charleston, South Carolina, where he was active in the Maritime Law Society, Family Law Society, and other groups. He clerked at law firms of various sizes and areas of law throughout his law school career. Prior to law school, Alston studied History and Political Science at the College of Charleston in Charleston, South Carolina.

Richa Sprung – Counsel

Richa Sprung is Counsel with the Firm's Antitrust department. Prior to joining Berger Montague, Richa was an eDiscovery Review Manager at Consilio where she focused her practice on large-scale eDiscovery projects ranging in various civil actions. Prior to that, Richa was involved in eDiscovery client services ranging from in-house to vendor positions. During her eDiscovery career, Richa has developed extensive knowledge into tools, best practices to gather and produce ESI, and expert level communication with clients to achieve the optimal discovery process while minimizing costs.

Richa graduated from The Catholic University of America, Columbus School of Law, where she was active in various clubs as well as the Health Law Journal. Richa served as the President of the South Asian Law School Association, Secretary of the Federalist Society, Vice-President of the Criminal Law society, and had active membership in additional groups. Richa was also a member of the National Moot Trial Team where she competed throughout the states and received high praises for her advocacy skills.

Francine D. Wilensky - Counsel

Francine D. Wilensky is Counsel in the Firm's Philadelphia Office in the Antitrust Department. She has more than fifteen years of experience in discovery, trial preparation and litigation. Ms. Wilensky has experience in Antitrust, Commercial Litigation, Pharmaceutical Litigation, Securities Litigation, Construction Litigation and Real Estate Law.

Prior to joining the firm, most recently, Fran practiced as a public interest attorney for a legal aid organization representing tenants facing eviction and homelessness and was Co-Chair of the City of Philadelphia's Committee to prevent Illegal Evictions. She also served on the Philadelphia Court of Common Pleas Committee for Real Estate Working Professionals.

Ms. Wilensky graduated from Temple University School of Law with Honors in Real Estate Law. Fran received her undergraduate degree from Temple University with a Bachelor of Arts Degree in History and an Accounting Minor, Summa Cum Laude, Phi Beta Kappa.

Fran is admitted to practice law in the Federal and State Courts in Pennsylvania and New Jersey.

Of Counsel

H. Laddie Montague Jr. – Chair *Emeritus* & Of Counsel

H. Laddie Montague Jr. is Chairman *Emeritus* of the firm, in addition to his continuing work as Of Counsel. Mr. Montague was Chairman of the firm from 2003 to 2016 and served as a member of the firm's Executive Committee for decades, having joined the firm's predecessor David Berger, P.A., at its inception in 1970.

In addition to being one of the courtroom trial counsel for plaintiffs in the mandatory punitive damage class action in the *Exxon Valdez Oil Spill Litigation*, Mr. Montague has served as lead or co-lead counsel in many class actions, including, among others, *High Fructose Corn Syrup Antitrust Litigation* (2006), *In re Infant Formula Antitrust Litigation* (1993) and *Bogosian v. Gulf Oil Corp.* (1984), a nationwide class action against thirteen major oil companies. Mr. Montague was co-lead counsel for the State of Connecticut in its litigation against the tobacco industry. He is currently co-lead counsel in several pending class actions. In addition to the *Exxon Valdez Oil Spill Litigation*, he has tried several complex and protracted cases to the jury, including three class actions: *In re Master Key Antitrust Litigation* (1977), *In re Corrugated Container Antitrust Litigation* (1980) and *In re Brand Name Prescription Drugs Antitrust Litigation*, M.D.L. (1997-1998). For his work as trial counsel in the *Exxon Valdez Oil Spill Litigation*, Mr. Montague shared the Trial Lawyers for Public Justice 1995 Trial Lawyer of the Year Award.

Mr. Montague has been repeatedly singled out by *Chambers USA: America's Leading Lawyers for Business* as one of the top antitrust attorneys in the Commonwealth of Pennsylvania. He is lauded for his stewardship of the firm's antitrust department, referred to as "the dean of the Bar," stating that his peers in the legal profession hold him in the "highest regard," and explicitly praised for, among other things, his "fair minded[ness]." He also is or has been listed in *Lawdragon*, *An International Who's Who of Competition Lawyers*, and *The Legal 500: United States (Litigation)*. He has repeatedly been selected by *Philadelphia Magazine* as one of the top 100 lawyers in Pennsylvania. Mr. Montague has also been one of the only two inductees in the American Antitrust Institute's inaugural Private Antitrust Enforcement Hall of Fame.

He has been invited and made a presentation at the Organization for Economic Cooperation and Development (Paris, 2006); the European Commission and International Bar Association Seminar (Brussels, 2007); the Canadian Bar Association, Competition Section (Ottawa, 2008); and the 2010 Competition Law & Policy Forum (Ontario).

Mr. Montague is a graduate of the University of Pennsylvania (B.A. 1960) and the Dickinson School of Law (L.L.B. 1963), where he was a member of the Board of Editors of the Dickinson Law Review. He is the former Chairman of the Board of Trustees of the Dickinson School of Law of Penn State University and current Chairman of the Dickinson Law Association.

Harold Berger –Of Counsel, Executive Shareholder *Emeritus*

Judge Berger is an Executive Shareholder *Emeritus* & Of Counsel. He participated in many complex litigation matters, including the *Exxon Valdez Oil Spill Litigation*, No. A89-095, in which he served on the case management committee and as Co-Chair of the national discovery team. He also participated in the *Three Mile Island Litigation*, No. 79-0432 (M.D. Pa.), where he acted as liaison counsel, and in the nationwide school asbestos property damage class action, *In re Asbestos School Litigation*, Master File No. 83-0268 (E.D. Pa.), where the firm served as co-lead counsel.

A former Judge of the Court of Common Pleas of Philadelphia, he has long given his service to the legal community and the judiciary. He is also active in law and engineering alumni affairs at the University of Pennsylvania and in other philanthropic endeavors. He serves as a member of Penn's Board of Overseers and as Chair of the Friends of Penn's Biddle Law Library, having graduated from both the engineering and law schools at Penn. Judge Berger also serves on the Executive Board of Penn Law's Center for Ethics and Rule of Law. In 2017, he was the recipient of Penn Law's Inaugural Lifetime Commitment Award, which recognizes graduates "who through a lifetime of service and commitment to Penn Law have truly set a new standard of excellence."

He is past Chair of the Federal Bar Association's National Committee on the Federal and State Judiciary and past President of the Federal Bar Association's Eastern District Chapter. He is the author of numerous law review articles, has lectured extensively before bar associations and at universities, and has served as Chair of the International Conferences on Global Interdependence held at Princeton University. Judge Berger has served as Chair of the Aerospace Law Committees of the American, Federal and Inter-American Bar Associations and, in recognition of the importance and impact of his scholarly work, was elected to the International Academy of Astronautics in Paris.

As his biographies in *Who's Who in America*, *Who's Who in American Law* and *Who's Who in the World* outline, he is the recipient of numerous awards, including the Special Service Award of the Pennsylvania Conference of State Trial Judges, a Special American Bar Association Presidential Program Award and Medal, and a Special Federal Bar Association Award for distinguished service to the Federal and State Judiciary. He has been given the highest rating (AV Preeminent) for legal ability as well as the highest rating for ethical standards by Martindale-Hubbell. Judge Berger was also presented with a Lifetime Achievement Award in 2014 by *The Legal Intelligencer* in recognition of figures who have helped shape the law in Pennsylvania and who had a distinct impact on the legal profession in the Commonwealth.

He is a permanent member of the Judicial Conference of the United States Court of Appeals for the Third Circuit and has served as Chair of both the Judicial Liaison and International Law Committees of the Philadelphia Bar Association. He has also served as National Chair of the FBA's Alternate Dispute Resolution Committee.

Recipient of the Alumnus of the Year Award of the Thomas McKean Law Club of the University of Pennsylvania Law School, he was further honored by the University's School of Engineering

and Applied Science by the dedication of the Harold Berger Biennial Distinguished Lecture and Award given to a technical innovator who has made a lasting contribution to the quality of our lives. He was also honored by the University by the dedication of an auditorium and lobby bearing his name and by the dedication of a student award in his name for engineering excellence.

Long active in diverse, philanthropic, charitable, community and inter-faith endeavors Judge Berger serves as a Lifetime Honorary Trustee of the Federation of Jewish Charities of Greater Philadelphia, as a Director of the National Museum of Jewish History, as a National Director of the Hebrew Immigrant Aid Society (HIAS) in its endeavors to assist refugees and indigent souls of all faiths, as A Charter Fellow of the Foundation of the Federal Bar Association and as a member of the Hamilton Circle of the Philadelphia Bar Foundation.

Among other honors and awards, as listed above, Judge Berger was honored by the University of Pennsylvania Law School at its annual Benefactors' Dinner and is the recipient of the "Children of the American Dream" award of HIAS for his leadership in the civic, legal, academic and Jewish communities.

Gary E. Cantor – Of Counsel

Gary E. Cantor is Of Counsel in the Philadelphia office. He concentrates his practice on securities and commercial litigation and derivatives valuations.

Mr. Cantor served as co-lead counsel in *Steiner v. Phillips, et al. (Southmark Securities)*, Consolidated C.A. No. 3-89-1387-X (N.D. Tex.), (class settlement of \$82.5 million), and *In re Kenbee Limited Partnerships Litigation*, Civil Action No. 91-2174 (GEB), (class settlement involving 119 separate limited partnerships resulting in cash settlement, oversight of partnership governance and debt restructuring (with as much as \$100 million in wrap mortgage reductions)). Mr. Cantor also represented plaintiffs in numerous commodity cases.

In recent years, Mr. Cantor played a leadership role in *In re Oppenheimer Rochester Funds Group Securities Litigation* (\$89.5 million settlement on behalf of investors in six tax-exempt bond mutual funds managed by OppenheimerFunds, Inc.), No. 09-md-02063-JLK (D. Col.); *In re KLA-Tencor Corp. Securities Litigation*, Master File No. C-06-04065-CRB (N.D. Cal.) (\$65 million class settlement); *In re Sepracor Inc. Securities Litigation*, Civil Action no. 02-12235-MEL (D. Mass.) (\$52.5 million settlement.); *In re Sotheby's Holding, Inc. Securities Litigation*, No. 00 Civ. 1041 (DLC) (S.D.N.Y.) (\$70 million class settlement). He was also actively involved in the *Merrill Lynch Securities Litigation* (class settlement of \$475 million) and *Waste Management Securities Litigation* (class settlement of \$220 million).

For over 20 years, Mr. Cantor also has concentrated on securities valuations and the preparation of event or damage studies or the supervision of outside damage experts for many of the firm's cases involving stocks, bonds, derivatives, and commodities. Mr. Cantor's work in this regard has focused on statistical analysis of securities trading patterns and pricing for determining materiality, loss causation and damages as well as aggregate trading models to determine class-wide damages.

Mr. Cantor was a member of the Moot Court Board at University of Pennsylvania Law School where he authored a comment on computer-generated evidence in the University of Pennsylvania Law Review. He graduated from Rutgers College with the highest distinction in economics and was a member of Phi Beta Kappa.

Peter R. Kahana –Of Counsel

Peter R. Kahana is Of Counsel in the Insurance and Antitrust practice groups. He concentrates his practice in complex civil and class action litigation involving relief for insurance policyholders and consumers of other types of products or services who have been victimized by fraudulent conduct and unfair business practices.

Significant class cases vindicating the rights of insurance policyholders or consumers in which Mr. Kahana was appointed as co-class counsel have included: settlement in 2012 for \$90 million of breach of fiduciary duty and negligence claims (certified for trial in 2009) on behalf of a class of former policyholder-members of Anthem Insurance Companies, Inc. ("Anthem") alleging the class was paid insufficient cash compensation in connection with Anthem's conversion from a mutual insurance company to a publicly-owned stock insurance company (a process known as "demutualization") (*Ormond v. Anthem, Inc., et al.*, USDC, S.D. Ind., Case No. 1:05-cv-01908 (S.D. Ind. 2012)); settlement in 2010 for \$72.5 million of a nationwide civil RICO and fraud class action (certified for trial in 2009) against The Hartford and its affiliates on behalf of a class of personal injury and workers compensation claimants for the Hartford's alleged deceptive business practices in settling these injury claims for Hartford insureds with the use of structured settlements (*Spencer, et al. v. The Hartford Financial Services Group, Inc., et al.*, 256 F.R.D. 284 (D. Conn. 2009)); settlement in 2009 for \$75 million of breach of contract, Unfair Trade Practices Act and insurance bad faith tort claims on behalf of a class of West Virginia automobile policyholders (certified for trial in 2007) alleging that Nationwide Mutual Insurance Company failed to properly offer and provide them with state-required optional levels of uninsured and underinsured motorist coverage (*Nationwide Mutual Insurance Company v. O'Dell, et al.*, Circuit Court of Roane County, W. Va., Civ. Action No. 00-C-37); and, settlement in 2004 for \$20 million on behalf of a class of cancer victims alleging that their insurer refused to pay for health insurance benefits for chemotherapy and radiation treatment (*Bergonzi v. CSO, USDC, D.S.D.*, Case No. C2-4096). For his efforts in regard to the Bergonzi matter, Mr. Kahana was named as the recipient of the American Association for Justice's Steven J. Sharp Public Service Award, which is presented annually to those attorneys whose cases tell the story of American civil justice and help educate state and national policymakers and the public about the importance of consumers' rights.

Mr. Kahana has also played a leading role in major antitrust and environmental litigation, including cases such as *In re Brand Name Prescription Drugs Antitrust Litigation* (\$723 million settlement), *In re Ashland Oil Spill Litigation* (\$30 million settlement), and *In re Exxon Valdez* (\$287 million compensatory damage award and \$507.5 million punitive damage award). In connection with his work as a member of the trial team that prosecuted *In re The Exxon Valdez*, Mr. Kahana was selected in 1995 to share the Trial Lawyer of the Year Award by the Public Justice Foundation.

Maryellen Madden – Of Counsel

Maryellen Madden focuses her practice on complex litigation and commercial disputes, including securities, corporate governance, real estate, commercial contracts, health care and the sale and distribution of goods. She has handled litigation, including complex, multi-district litigation, in 22 states, as well as before domestic and international arbitration panels, administrative agencies and industry self-regulatory organizations. Prior to joining Berger Montague, she was an attorney with a national law firm.

Susan Schneider Thomas – Of Counsel

Susan Schneider Thomas concentrates her practice on *qui tam* litigation.

Ms. Thomas has substantial complex litigation experience. Before joining the firm, she practiced law at two Philadelphia area firms, Schnader, Harrison, Segal & Lewis and Greenfield & Chimicles, where she was actively involved in the litigation of complex securities fraud and derivative actions.

Upon joining the firm, Ms. Thomas concentrated her practice on complex securities and derivative actions. In 1986, she joined in establishing Zlotnick & Thomas where she was a partner with primary responsibility for the litigation of several major class actions including *Geist v. New Jersey Turnpike Authority*, C.A. No. 92-2377 (D.N.J.), a bond redemption case that settled for \$2.25 million and *Burstein v. Applied Extrusion Technologies*, C.A. No. 92-12166-PBS (D. Mass.), which settled for \$3.4 million.

Upon returning to the firm, Ms. Thomas has had major responsibilities in many securities and consumer fraud class actions, including *In re CryoLife Securities Litigation*, C.A. No. 1:02-CV-1868 BBM (N.D.Ga.), which settled in 2005 for \$23.25 million and *In re First Alliance Mortgage Co.*, Civ. No. SACV 00-964 (C.D.Cal.), a deceptive mortgage lending action which settled for over \$80 million in cooperation with the FTC. More recently, Ms. Thomas has concentrated her practice in the area of healthcare *qui tam* litigation. As co-counsel for a team of whistleblowers, she worked extensively with the U.S. Department of Justice and various State Attorney General offices in the prosecution of False Claims Act cases against pharmaceutical manufacturers that recovered more than \$2 billion for Medicare and Medicaid programs and over \$350 million for the whistleblowers. She has investigated or is litigating False Claims Act cases involving defense contractors, off-label marketing by drug and medical device companies, federal grant fraud, upcoding and other billing issues by healthcare providers, drug pricing issues and fraud in connection with for-profit colleges and student loan programs.

Tyler E. Wren – Of Counsel

Mr. Wren is a trial lawyer with over 35 years of experience in both the public and private sectors.

Mr. Wren has represented both plaintiffs and defendants in a broad spectrum of litigation matters, including class actions, environmental, civil rights, commercial disputes, personal injury, insurance coverage, election law, zoning and historical preservation matters and other

government affairs. Mr. Wren routinely appears in both state and federal courts, as well as before local administrative agencies.

Following his graduation from law school, Mr. Wren served as staff attorney to the Committee of Seventy, a local civic watchdog group. Mr. Wren then spent a decade in the Philadelphia City Solicitor's Office in various positions in which his litigation and counseling skills were developed: Chief Assistant City Solicitor for Special Litigation and Appeals, Divisional Deputy City Solicitor for the Environment, Counsel to the Philadelphia Board of Ethics and Counsel to the Philadelphia Planning Commission. After leaving government employ and before joining the Firm in 2010, Mr. Wren was in private practice, including nine years with the Sprague and Sprague firm, headed by nationally recognized litigator Richard Sprague.

EXHIBIT 2

**Class Counsel Expenses
Berger Montague PC**

DATE	DESCRIPTION	AMOUNT
10/26/2021	MICHELLE DRAKE - Airfare - Flight to San Francisco for Donato hearings 11/2021 - - DELTA AIR LINES SCOTTSDALE AZ	\$440.31
11/24/2021	MICHELLE DRAKE - 11/2021 trip for hearing - Merchant:Uber Technologies Inc. - Uber Technologies Inc.*****	\$32.81
11/24/2021	MICHELLE DRAKE - 11/2021 trip for hearing - Merchant:Uber Technologies Inc. - Uber Technologies Inc.*****	\$38.17
11/7/2023	Sophia Rios - 11/2023 Mileage - round trip mileage from home to hotel for mediation: 132 miles x2 = 264 miles total	\$167.04
	TOTAL TRAVEL:	\$678.33
11/23/2021	MICHELLE DRAKE*; 2.44196E+15; *****MICHELLE DRAKE - Breakfast - meal on trip for motion to transfer hearing - - STARBUCKS 800-782-72 SEATTLE WA*****	\$22.53
11/24/2021	MICHELLE DRAKE*; 2.44E+15_7; *****MICHELLE DRAKE - Lunch - meal on trip for hearing - Merchant:Uber Technologies Inc. - Uber Technologies Inc.*****	\$32.81
11/24/2021	MICHELLE DRAKE*; 2.44E+15_7; *****MICHELLE DRAKE - Dinner - meal on trip for hearing - Merchant:Uber Technologies Inc. - Uber Technologies Inc.*****	\$38.17
11/7/2023	Sophia M Rios; 3.43E+15_4; *****Sophia Rios - Lunch - lunch - - PHO 999 0000 VAN NUYS CA*****	\$18.89
11/7/2023	Sophia M Rios; 3.43E+15_4; *****Sophia Rios - Hotel - Breakfast - breakfast at hotel - Starbucks - - WESTIN HOTEL BONAVENTURE LOS ANGELES CA*****	\$22.39
11/7/2023	Sophia M Rios; 3.43E+15_4; *****Sophia Rios - Hotel - Dinner - dinner at hotel - - WESTIN HOTEL BONAVENTURE LOS ANGELES CA*****	\$80.00
11/7/2023	Sophia M Rios; 3.43E+15_4; *****Sophia Rios - Dinner - dinner - - BT*DD *DOORDASH TRIP SAN FRANCISCO CA*****	\$33.67
	TOTAL MEALS:	\$248.46
9/30/2022	RICOH USA, Inc.*; EDD22080311; August 2022 Monthly Hosting Charges.	\$1.11
10/27/2022	RICOH USA, Inc.*; EDD22090334; September 2022 Monthly Hosting Charges	\$1.04
11/22/2022	RICOH USA, Inc.*; EDD22100325; October 2022 Monthly Hosting Charges	\$3.06
12/9/2022	RICOH USA, Inc.*; EDD22110264; November 2022 Monthly Hosting Charges	\$2.70
1/31/2023	RICOH USA, Inc.*; EDD22120180; December 2022 Monthly Hosting Charges .	\$3.04
3/3/2023	RICOH USA, Inc.*; EDD23010298; January 2023 hosting charges.	\$3.08
3/20/2023	RICOH USA, Inc.*; EDD23020295; February 2023 Hosting Charges.	\$3.77
3/20/2023	RICOH USA, Inc.*; EDD23020295; February 2023 Hosting Charges.	\$1.00
4/26/2023	RICOH USA, Inc.*; EDD23040002; March 2023 Client Hosting.	\$3.69
4/26/2023	RICOH USA, Inc.*; EDD23040002; March 2023 Client Hosting.	\$469.39
5/26/2023	RICOH USA, Inc.*; EDD23040255; April 2023 Hosting Charges.	\$5.53
5/26/2023	RICOH USA, Inc.*; EDD23040255; April 2023 Hosting Charges.	\$540.32
6/22/2023	RICOH USA, Inc.*; EDD23050263; May 2023 Relativity Hosting.	\$6.59
6/22/2023	RICOH USA, Inc.*; EDD23050263; May 2023 Relativity Hosting.	\$155.05
8/4/2023	RICOH USA, Inc.*; EDD23060269; June 2023 Relativity Hosting.	\$6.41
8/4/2023	RICOH USA, Inc.*; EDD23060269; June 2023 Relativity Hosting.	\$432.37
8/31/2023	RICOH USA, Inc.*; EDD23070155; July 2023 Relativity Hosting.	\$9.01

**Class Counsel Expenses
Berger Montague PC**

DATE	DESCRIPTION	AMOUNT
8/31/2023	RICOH USA, Inc.*; EDD23070155; July 2023 Relativity Hosting.	\$612.67
11/1/2023	RICOH USA, Inc.*; EDD23090121; September 2023 Hosting Charges.	\$31.65
11/1/2023	RICOH USA, Inc.*; EDD23090121; September 2023 Hosting Charges.	\$769.27
11/17/2023	RICOH USA, Inc.*; EDD23080221; August 2023 Ricoh Relativity Hosting.	\$30.57
11/17/2023	RICOH USA, Inc.*; EDD23080221; August 2023 Ricoh Relativity Hosting.	\$1,853.05
11/22/2023	RICOH USA, Inc.*; EDD23100122; October 2023 Ricoh Relativity Hosting.	\$32.18
11/22/2023	RICOH USA, Inc.*; EDD23100122; October 2023 Ricoh Relativity Hosting.	\$1,220.03
12/11/2023	RICOH USA, Inc.*; EDD23110226; November 2023 Ricoh Relativity Hosting.	\$43.69
12/11/2023	RICOH USA, Inc.*; EDD23110226; November 2023 Ricoh Relativity Hosting.	\$855.39
1/30/2024	RICOH USA, Inc.*; EDD23120239; December 2023 hosting.	\$44.61
2/26/2024	RICOH USA, Inc.*; EDD24010171; January 2024 Ricoh Hosting.	\$44.61
	TOTAL E-DISCOVERY HOSTING:	\$7,184.88
3/29/2023	Nickoline M. Drury (court reporter), for hearing transcript Check 205	\$163.50
4/17/2023	Nickoline Drury (court reporter) for hearing transcript Check 206	\$31.50
8/24/2023	Deposition transcript of Stephanie Siegel - - NAEGELI DEPOSITION&T PORTLAND OR''''''	\$1,880.95
10/27/2023	LEXITAS*; 1495082; deposition transcripts	\$675.00
10/27/2023	LEXITAS*; 1495081; deposition transcripts	\$1,000.00
10/27/2023	LEXITAS*; 1495534; deposition transcripts	\$1,000.00
	TOTAL TRANSCRIPTS:	\$4,750.95
8/25/2023	FIRST LEGAL NETWORK INSURANCE SERVICES, LLC*; 50502; Branch subpoena service	\$215.37
	TOTAL SERVICE FEES:	\$215.37
9/9/2021	Pacer August 2021	\$1.80
11/11/2021	Westlaw October 2021	\$53.40
8/25/2022	Westlaw May 2022	\$11.26
8/29/2022	August 2021 Westlaw	\$21.96
8/30/2022	September 2021 Westlaw	\$43.83
8/30/2022	March 2022 Westlaw	\$14.32
8/30/2022	September 2021 Westlaw	\$35.02
8/30/2022	November 2021 Westlaw	\$9.20
4/17/2023	December 2022 Westlaw	\$15.48
6/22/2023	March 2023 Westlaw Bill	\$414.03
6/22/2023	April 2023 Westlaw Bill	\$43.13
10/20/2023	Westlaw September 2023	\$289.90
10/20/2023	Westlaw August 2023	\$8.08
10/23/2023	Westlaw July 2023	\$4.51
11/20/2023	Westlaw October 2023	\$145.77
2/5/2024	Westlaw December 2023	\$27.47
2/5/2024	Westlaw November 2023	\$49.43
	TOTAL WESTLAW CHARGES:	\$1,188.59
8/27/2021	4Discovery, LLC.*; 4569; Robinhood (21161) investigation	\$427.04
9/14/2021	4Discovery, LLC.*; 4599; Investigation	\$175.00
9/22/2021	4Discovery, LLC.*; 4589; Investigation	\$100.00
9/22/2021	4Discovery, LLC.*; 4589; Investigation	\$175.00

**Class Counsel Expenses
Berger Montague PC**

DATE	DESCRIPTION	AMOUNT
9/22/2021	4Discovery, LLC.*; 4589; Investigation	\$750.00
2/1/2022	Personal Investigator - Background Reports	\$500.00
1/12/2023	4Discovery, LLC.*; 5928; forensic expert consulting fees	\$175.00
5/12/2023	Cozen O'Connor - Invoice 25104016	\$56,803.88
	TOTAL PROFESSIONAL FEES:	\$59,105.92
8/3/2023	TelSwitch, Inc.*; 2307000709; digital consultant	\$4,400.00
10/25/2023	TelSwitch, Inc.*; 2307000709; digital consultant	\$2,094.65
1/23/2024	TelSwitch, Inc.*; 2309300709; digital consultant	\$16,569.92
	TOTAL EXPERT FEES:	\$23,064.57
4/13/2022	Printing	\$0.75
4/13/2022	Color Printing	\$0.60
3/29/2023	Printing	\$0.25
4/17/2023	Printing	\$0.25
7/14/2023	Printing	\$1.50
7/14/2023	Printing	\$1.50
9/21/2023	Printing	\$0.25
2/14/2024	Scanning	\$0.20
	TOTAL PRINTING/SCANNING:	\$5.30
9/2/2021	FedEx 7-470-26549; Sent 08/10/2021	\$25.27
7/19/2023	MN Postage - 03.9.23-6.22.23	\$1.80
9/19/2023	Reg. Mail sent 7/14/2023	\$1.59
	TOTAL POSTAGE:	\$28.66
8/25/2021	Sophia M Rios; 2.35613E+15; ""Sophia Rios - Filing Fees - filing fee for complaint - - US DISTRICT COURT ND SAN FRANCISCO CA""	\$402.00
8/25/2021	Sophia M Rios; 2.35613E+15; ""Sophia Rios - Filing Fees - process server fee - - ONELEGAL CCSALE03472 800-938-8815 CA""	\$82.36
9/9/2021	MICHELLE DRAKE*; 2.36535E+15; ""MICHELLE DRAKE - Filing Fees - pro hac fee for Drake - - US DISTRICT COURT ND SAN FRANCISCO CA""	\$317.00
4/12/2023	MICHELLE DRAKE*; 3.07615E+15; ""MICHELLE DRAKE - Filing Fees - Drake cert for pro hac - - PAYPAL *SUPREMECOUR 4029357733 GA""	\$10.00
4/12/2023	MICHELLE DRAKE*; 3.07615E+15; ""MICHELLE DRAKE - Filing Fees - Drake cert for pro hac - - SUPREME CT LAWYER RE SAINT PAUL MN""	\$53.15
4/12/2023	MICHELLE DRAKE*; 3.07615E+15; ""MICHELLE DRAKE - Filing Fees - Drake pro hac - - COURTS/USDC-NY-S 000 NEW YORK NY""	\$200.00
4/12/2023	MICHELLE DRAKE*; 3.07615E+15; ""MICHELLE DRAKE - Filing Fees - Drake pro hac - - COURTS/USDC-NY-S 000 NEW YORK NY""	\$200.00
4/12/2023	MICHELLE DRAKE*; 3.07616E+15; ""MICHELLE DRAKE - Filing Fees - filing fee to start case - - COURTS/USDC-NY-S 000 NEW YORK NY""	\$49.00
4/12/2023	MICHELLE DRAKE*; 3.07616E+15; ""MICHELLE DRAKE - Filing Fees - filing fee to start case - - COURTS/USDC-NY-S 000 NEW YORK NY""	\$49.00
5/15/2023	MICHELLE DRAKE*; 3.15123E+15_3; ""MICHELLE DRAKE - Filing Fees - hearing transcription fee - - SOUTHERN DISTRICT RE NEW YORK NY""	\$294.00
	TOTAL FILING FEES:	\$1,656.51

**Class Counsel Expenses
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DATE	DESCRIPTION	AMOUNT
9/15/2022	DocuSign 8.03.2022 to 9.06.2022	\$2.48
9/22/2023	DocuSign - 8/11/2023-09/12/2023	\$2.48
8/22/2023	DocuSign - 7.14.2023-8.10.2023	\$4.96
4/18/2023	DocuSign - 3/8/2023-4/10/2023	\$9.92
12/8/2023	DocuSign - 9/13/2023-11/16/2023	\$4.96
3/7/2024	DocuSign 01/03/2024-02/22/2024	\$4.96
7/26/2023	DocuSign - 06/13/2023-07/13/2023	\$2.48
	TOTAL DOCUSIGN FEES:	\$32.24
9/8/2023	JAMS*; 6787462; mediation - plaintiff share	\$10,475.00
12/15/2023	JAMS*; 6940296; continued mediation	\$600.00
	TOTAL MEDIATION FEES:	\$11,075.00
	TOTAL:	\$110,339.97

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Rios, Sophia M	5/17/2021	1	L100	Correspond with potential client	\$710.00	\$710.00
Drake, Eleanor Michelle	5/18/2021	0.3	L100	review correspondenc re [REDACTED]	\$1,180.00	\$354.00
Rios, Sophia M	5/20/2021	1	L100	draft [REDACTED] letter and send to [REDACTED] client; correspond with vender re [REDACTED]	\$710.00	\$710.00
Rios, Sophia M	5/21/2021	0.1	L100	Correspond with [REDACTED] client re [REDACTED]	\$710.00	\$71.00
Rios, Sophia M	5/24/2021	0.2	L100	Coordinate [REDACTED] with [REDACTED]	\$710.00	\$142.00
Drake, Eleanor Michelle	5/25/2021	0.3	L100	email with S Rios re [REDACTED]	\$1,180.00	\$354.00
Rios, Sophia M	5/25/2021	0.3	L100	Find information for [REDACTED]	\$710.00	\$213.00
Rios, Sophia M	5/27/2021	0.8	L100	Correspond with [REDACTED] re [REDACTED] client; correspond with client.	\$710.00	\$568.00
Rios, Sophia M	6/1/2021	0.4	L100	Call with [REDACTED] client	\$710.00	\$284.00
Rios, Sophia M	6/3/2021	2	L100	Collect [REDACTED] client; coordinate [REDACTED]	\$710.00	\$1,420.00
Rios, Sophia M	6/7/2021	0.6	L100	Coordinate with [REDACTED] re [REDACTED]	\$710.00	\$426.00
Rios, Sophia M	7/12/2021	0.8	L100	Review [REDACTED] on [REDACTED] client.	\$710.00	\$568.00
Rios, Sophia M	7/13/2021	1.1	L100	Send [REDACTED] to clients.	\$710.00	\$781.00
Rios, Sophia M	7/15/2021	0.6	L100	Review and respond to email from clients.	\$710.00	\$426.00
Rios, Sophia M	7/20/2021	0.5	L100	Review and respond to email from clients.	\$710.00	\$355.00
Rios, Sophia M	7/23/2021	4	L100	Call w/ TM re complaint; research [REDACTED]	\$710.00	\$2,840.00
Rios, Sophia M	7/26/2021	1.5	L100	Collect [REDACTED] and send to Terrell Marshall; finalize research re [REDACTED]	\$710.00	\$1,065.00
Rios, Sophia M	7/28/2021	0.9	432	Draft and send email to client; attention to email with co-counsel; schedule call; discuss [REDACTED]	\$710.00	\$639.00
Rios, Sophia M	7/29/2021	0.7	L100	Discuss [REDACTED]; schedule call with co-counsel.	\$710.00	\$497.00
Hibray, Jean	7/28/2021	0.1	L140	Review S Rios email re [REDACTED]	\$450.00	\$45.00
Rios, Sophia M	8/2/2021	1.7	L110	Attention to [REDACTED] compliance; draft complaint.	\$710.00	\$1,207.00
Drake, Eleanor Michelle	8/2/2021	1	L210	review draft complant from cocounsel, send to S. Rios with comments	\$1,180.00	\$1,180.00
Rios, Sophia M	8/3/2021	3.2	L110	Call with co-counsel; revise complaint; correspond with clients.	\$710.00	\$2,272.00
Drake, Eleanor Michelle	8/3/2021	1	L210	meet with S Rios re draft complaint	\$1,180.00	\$1,180.00
Rios, Sophia M	8/4/2021	1.5	L110	Revise complaint.	\$710.00	\$1,065.00
Hibray, Jean	8/4/2021	0.2	L140	Move & organize [REDACTED] workspace in iManage per S Rios	\$450.00	\$90.00
Rios, Sophia M	8/5/2021	0.1	L110	Review draft complaint.	\$710.00	\$71.00
Rios, Sophia M	8/6/2021	0.1	L110	Revise complaint; correspond with clients.	\$710.00	\$71.00
Drake, Eleanor Michelle	8/6/2021	1.1	L210	review redline and revise draft complaint	\$1,180.00	\$1,298.00
Rios, Sophia M	8/7/2021	1.3	L250	Correspond with client; draft case initiating documents.	\$710.00	\$923.00
Rios, Sophia M	8/9/2021	1.6	L210	Correspond with clients; attention to filing complaint.	\$710.00	\$1,136.00
Gionnette, Julie	8/9/2021	2	L210	review complaint; civil cover sheet; proposed summons and certificate of interested entities; open case in N.D. Cal.; add case number to all documents; file documents in N.D. Cal.; download and save ECF dockets to file	\$285.00	\$570.00
Rios, Sophia M	8/10/2021	0.7	L210	Coordinate serving complaint; attention to NOA for BT.	\$710.00	\$497.00
Gionnette, Julie	8/10/2021	2	L210	download and review docket entries; calendar deadlines per scheduling order; draft notice of appearance for B. Terrell; work with Epiq to get courtesy copies of initial filing to judge; review Judge's standing orders	\$285.00	\$570.00
Rios, Sophia M	8/11/2021	1	L110	Correspnd with clients; attention to [REDACTED]	\$710.00	\$710.00
Gionnette, Julie	8/11/2021	1	L210	gather all required documents for service and arrange for process server	\$285.00	\$285.00
Rios, Sophia M	8/12/2021	1.1	L110	Call with client re [REDACTED]; attention to [REDACTED]	\$710.00	\$781.00
Gionnette, Julie	8/13/2021	0.5	L210	review and file Proof of Service of Summons and Complaint in N.D. California	\$285.00	\$142.50
Gionnette, Julie	8/17/2021	0.3	L140	download and review docket entries	\$285.00	\$85.50
Drake, Eleanor Michelle	8/17/2021	0.3	L210	Call S Rios re next steps	\$1,180.00	\$354.00
Rios, Sophia M	8/17/2021	0.3	L110	Call with EMD re next steps	\$710.00	\$213.00
Hibray, Jean	8/18/2021	0.3	L210	Prepare declination of magistrate, finalize and file same.	\$450.00	\$135.00
Hibray, Jean	8/18/2021	0.3	L210	Prepare pro hac application, finalize and file same for M Drake	\$450.00	\$135.00
Gionnette, Julie	8/18/2021	0.2	L140	download and review docket entries	\$285.00	\$57.00
Rios, Sophia M	8/18/2021	0.7	L110	Coordinate [REDACTED]; attention to [REDACTED]	\$710.00	\$497.00
Gionnette, Julie	8/19/2021	0.2	L140	download and review docket entries	\$285.00	\$57.00
Rios, Sophia M	8/19/2021	0.4	L110	Coordinate [REDACTED]; attention to [REDACTED]	\$710.00	\$284.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Rios, Sophia M	8/20/2021	0.2	L110	Coordinate [REDACTED]	\$710.00	\$142.00
Rios, Sophia M	8/23/2021	0.7	L110	Coordinate [REDACTED]; attention to draft stipulation.	\$710.00	\$497.00
Gionnette, Julie	8/23/2021	0.2	L140	download and review docket entry; calendar deadline	\$285.00	\$57.00
Drake, Eleanor Michelle	8/23/2021	2.5	L240	review [REDACTED] draft and send summary memo to team	\$1,180.00	\$2,950.00
Hibray, Jean	9/2/2021	1	L300	Draft RFPs, Interrogos for attorney edits	\$450.00	\$450.00
Drake, Eleanor Michelle	9/13/2021	0.3	L210	respond to request from oc for stay pending motion to dismiss after consultation with cocounsel	\$1,180.00	\$354.00
Rios, Sophia M	9/13/2021	1.2	L390	Research [REDACTED]	\$710.00	\$852.00
Rios, Sophia M	9/14/2021	1.8	L390	Research [REDACTED]	\$710.00	\$1,278.00
Gionnette, Julie	9/17/2021	0.3	L140	review docket entries; update calendar deadlines	\$285.00	\$85.50
Rios, Sophia M	9/17/2021	6.1	L240	Review motion to transfer and motion to dismiss; formulate response; conduct research.	\$710.00	\$4,331.00
Drake, Eleanor Michelle	9/20/2021	1.3	L240	review Robinhood motion to dismiss; research caselaw cited therein on [REDACTED] and review documents from S. Rios re same	\$1,180.00	\$1,534.00
Drake, Eleanor Michelle	9/20/2021	0.3	L240	call with co-counsel re substance of response to motion to dismiss	\$1,180.00	\$354.00
Drake, Eleanor Michelle	9/20/2021	0.3	L250	call with co-counsel re substance of response to motion to transfer	\$1,180.00	\$354.00
Drake, Eleanor Michelle	9/20/2021	1.5	L250	review Robinhood motion to transfer. Review email from S. Rios regarding transfer standard	\$1,180.00	\$1,770.00
Rios, Sophia M	9/20/2021	1.4	L250	Draft opposition to motion to transfer and motion to dismiss.	\$710.00	\$994.00
Rios, Sophia M	9/21/2021	1.5	L250	Draft opposition to motion to transfer.	\$710.00	\$1,065.00
Rios, Sophia M	9/22/2021	2.3	L250	Draft opposition to motion to transfer.	\$710.00	\$1,633.00
Rios, Sophia M	9/23/2021	3.9	L250	Draft opposition to motion to transfer.	\$710.00	\$2,769.00
Gionnette, Julie	9/24/2021	0.3	L140	download and review docket entries	\$285.00	\$85.50
Hibray, Jean	9/24/2021	0.9	L430	Begin research for request for judicial notice, start draft of same.	\$450.00	\$405.00
Rios, Sophia M	9/24/2021	8	L250	Draft opposition to motion to transfer.	\$710.00	\$5,680.00
Rios, Sophia M	9/28/2021	3.3	L250	Draft opposition to motion to transfer and motion to dismiss.	\$710.00	\$2,343.00
Drake, Eleanor Michelle	9/28/2021	4.2	L250	review redline and revise response to motion to transfer	\$1,180.00	\$4,956.00
Hibray, Jean	9/29/2021	0.3	L430	Review current transfer opposition, locate and fill in citations	\$450.00	\$135.00
Hibray, Jean	9/29/2021	1	L430	Review documents for [REDACTED], edit draft [REDACTED], research caselaw for support. Email to S Rios with notes on same.	\$450.00	\$450.00
Rios, Sophia M	9/29/2021	3.3	L250	Draft opposition to motion to transfer and motion to dismiss.	\$710.00	\$2,343.00
Drake, Eleanor Michelle	9/29/2021	1.5	L240	review redline and revise response to motion to dismiss, send to S Rios for additional edits	\$1,180.00	\$1,770.00
Drake, Eleanor Michelle	9/29/2021	1.3	L240	further review redline and revise response to motion to dismiss after S Rios edits	\$1,180.00	\$1,534.00
Drake, Eleanor Michelle	9/29/2021	1.6	L250	review redline and revise S Rios draft of response to motion to transfer and send to S Rios for further revisions	\$1,180.00	\$1,888.00
Drake, Eleanor Michelle	9/29/2021	0.8	L250	review and incorporate Beth Terrel edits to motion to transfer response	\$1,180.00	\$944.00
Hibray, Jean	9/30/2021	1.5	L430	Proof opposition to transfer, prepare tables, finalize. Finalize RJN and exhibits. Email to Terrell Marshall team for filing.	\$450.00	\$675.00
Hibray, Jean	9/30/2021	0.3	L430	Pull new copy of RJN exhibit, review dismiss opposition and excerpt exhibit accordingly, email S Rios re same.	\$450.00	\$135.00
Rios, Sophia M	9/30/2021	1.2	L250	Draft opposition to motion to transfer and motion to dismiss; prepare for filing.	\$710.00	\$852.00
Drake, Eleanor Michelle	9/30/2021	0.4	L240	call with J Murray re [REDACTED]	\$1,180.00	\$472.00
Gionnette, Julie	10/1/2021	0.3	L140	download and review docket entries	\$285.00	\$85.50
Hibray, Jean	10/5/2021	0.2	L140	Draft [REDACTED] finalize and send to client	\$450.00	\$90.00
Rios, Sophia M	10/6/2021	0.2	L190	Review and revise [REDACTED] to client.	\$710.00	\$142.00
Drake, Eleanor Michelle	10/8/2021	0.1	L100	bi-weekly team check in meeting on upcoming deadlines, case status and next steps	\$1,180.00	\$118.00
Gionnette, Julie	10/8/2021	0.2	L140	download and review docket entries	\$285.00	\$57.00
Hibray, Jean	10/8/2021	0.1	L120	Case meeting.	\$450.00	\$45.00
Gionnette, Julie	10/11/2021	0.2	L140	download and review docket entries	\$285.00	\$57.00
Rios, Sophia M	10/11/2021	0.8	L190	Review replies ISO motion to transfer and motion to dismiss.	\$710.00	\$568.00
Rios, Sophia M	10/15/2021	0.6	L190	Review filings in washington district court.	\$710.00	\$426.00
Drake, Eleanor Michelle	10/15/2021	0.3	L100	communicate with oc and cocounsel re not conducting hearing by Zoom	\$1,180.00	\$354.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Gionnette, Julie	10/18/2021	0.3	L140	download and review docket entries	\$285.00	\$85.50
Hibray, Jean	10/18/2021	0.1	L200	Update hearing appointment to include courthouse location.	\$450.00	\$45.00
Hibray, Jean	10/18/2021	0.6	L200	Prepare PDF and physical binder of motion papers for M Drake to prep for arguments.	\$450.00	\$270.00
Rios, Sophia M	10/18/2021	0.1	L240	Hearing preparation on MTD and MTT	\$710.00	\$71.00
Gionnette, Julie	10/19/2021	0.5	L140	review scheduling order and order reassigning case; update calendar deadlines	\$285.00	\$142.50
Hibray, Jean	10/19/2021	0.7	L200	Review [REDACTED], pull [REDACTED] and prepare PDF binder. Find [REDACTED] as well for hearing prep.	\$450.00	\$315.00
Rios, Sophia M	10/19/2021	0.4	L240	Hearing preparation on MTD and MTT	\$710.00	\$284.00
Drake, Eleanor Michelle	10/19/2021	0.4	L530	email with cocounsel and other attorneys in NDCal re [REDACTED]	\$1,180.00	\$472.00
Drake, Eleanor Michelle	10/19/2021	1.7	L530	review all briefs related to motion to dismiss, [REDACTED] review prior to hearing	\$1,180.00	\$2,006.00
Drake, Eleanor Michelle	10/19/2021	0.8	L530	draft memo to S Rios re [REDACTED] before hearing on motion to dismiss	\$1,180.00	\$944.00
Drake, Eleanor Michelle	10/19/2021	1.4	L530	review all briefs related to motion to transfer, [REDACTED] review prior to hearing	\$1,180.00	\$1,652.00
Drake, Eleanor Michelle	10/19/2021	0.4	L530	draft memo to co-counsel re call tomorrow to discuss hearing, [REDACTED]	\$1,180.00	\$472.00
Drake, Eleanor Michelle	10/19/2021	0.3	L530	draft memo to S Rios re [REDACTED] before hearing on motion to strike	\$1,180.00	\$354.00
Hibray, Jean	10/20/2021	0.2	L210	Email attorneys re upcoming ADR Cert deadline.	\$450.00	\$90.00
Rios, Sophia M	10/20/2021	6	L240	Hearing preparation on MTD and MTT	\$710.00	\$4,260.00
Drake, Eleanor Michelle	10/20/2021	2.3	L530	review cases cited in D memo in support of motion to dismiss and transfer	\$1,180.00	\$2,714.00
Drake, Eleanor Michelle	10/20/2021	3.5	L530	begin outline of argument on motion to transfer and motion to dismiss	\$1,180.00	\$4,130.00
Drake, Eleanor Michelle	10/20/2021	1	L530	call with cocounsel re argument on motion to dismiss	\$1,180.00	\$1,180.00
Drake, Eleanor Michelle	10/20/2021	2	L530	practice for oral argument	\$1,180.00	\$2,360.00
Hibray, Jean	10/21/2021	0.3	L210	Prepare [REDACTED] client, draft [REDACTED] email.	\$450.00	\$135.00
Hibray, Jean	10/21/2021	0.2	L200	Call with M Drake re hearing.	\$450.00	\$90.00
Rios, Sophia M	10/21/2021	0.2	L240	Attention to hearing on MTD and MTT	\$710.00	\$142.00
Drake, Eleanor Michelle	10/21/2021	1.5	L530	travel from hotel to courtroom, wait for hearing to begin, brief argument on motion to transfer	\$1,180.00	\$1,770.00
Drake, Eleanor Michelle	10/21/2021	2.3	TL	return flight to Minnesota from hearing	\$1,180.00	\$2,714.00
Drake, Eleanor Michelle	10/21/2021	0.3	L120	email to cocounsel describing [REDACTED]	\$1,180.00	\$354.00
Hibray, Jean	10/22/2021	0.9	L210	Review court procedures to order hearing transcripts, prepare form, email with M Drake re costs. Finalize & file request. Email court reporter to arrange payment.	\$450.00	\$405.00
Hibray, Jean	10/25/2021	0.1	L140	Email re hearing transcript	\$450.00	\$45.00
Drake, Eleanor Michelle	11/1/2021	0.1	L100	team meeting re next steps on cases	\$1,180.00	\$118.00
Hibray, Jean	11/2/2021	0.1	L140	Email re invoice	\$450.00	\$45.00
Hibray, Jean	11/3/2021	0.1	L210	Finalize transcript transaction	\$450.00	\$45.00
Gionnette, Julie	11/17/2021	0.1	L140	download and review docket entries	\$285.00	\$28.50
Hibray, Jean	11/17/2021	0.3	L210	Review transcript received, review ECF notices of transfer	\$450.00	\$135.00
Gionnette, Julie	11/19/2021	0.1	L140	download and review docket entry	\$285.00	\$28.50
Hibray, Jean	11/22/2021	0.5	L210	Prepare pro hacs for M Drake and S Rios in transfer district	\$450.00	\$225.00
Hibray, Jean	11/24/2021	0.2	L210	Emails re pro hacs	\$450.00	\$90.00
Rios, Sophia M	11/24/2021	0.3	L100	Review PHVs and approve for filing.	\$710.00	\$213.00
Gionnette, Julie	11/29/2021	0.3	L140	download and review docket entries	\$285.00	\$85.50
Gionnette, Julie	12/2/2021	0.2	L140	download and review docket entry	\$285.00	\$57.00
Drake, Eleanor Michelle	12/2/2021	0.1	L100	team meeting to discuss case status, deadlines, and next steps in litigation	\$1,180.00	\$118.00
Hibray, Jean	12/3/2021	0.4	L210	Review new judge's standing order, email team re Rule 23 deadline	\$450.00	\$180.00
Gionnette, Julie	12/6/2021	0.2	L140	download and review docket entries	\$285.00	\$57.00
Gionnette, Julie	12/10/2021	0.4	L140	download and review Order re Initial Disclosures and calendar deadlines	\$285.00	\$114.00
Hibray, Jean	12/10/2021	0.1	L210	Review docketing and email with J Gionnette re same	\$450.00	\$45.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Rios, Sophia M	12/15/2021	0.4	L100	Email co-counsel re [REDACTED].	\$710.00	\$284.00
Drake, Eleanor Michelle	12/16/2021	0.4	L250	review correspondence from oc re scheduling; email with cocounsel re response to same	\$1,180.00	\$472.00
Rios, Sophia M	12/30/2021	2	L300	Review and revise draft discovery requests.	\$710.00	\$1,420.00
Rios, Sophia M	1/3/2022	0.5	L300	Draft amended complaint.	\$710.00	\$355.00
Drake, Eleanor Michelle	1/3/2022	0.3	L100	call with opposing counsel re request to amend/delay 26f conference	\$1,180.00	\$354.00
Drake, Eleanor Michelle	1/3/2022	0.5	L100	call with J. Murray re [REDACTED]	\$1,180.00	\$590.00
Drake, Eleanor Michelle	1/3/2022	0.3	L100	review and respond to J. Murray correspondence re [REDACTED]	\$1,180.00	\$354.00
Drake, Eleanor Michelle	1/4/2022	0.1	L120	team meeting to discuss next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	1/4/2022	1.5	L300	Draft amended complaint; meeting re same.	\$710.00	\$1,065.00
Hibray, Jean	1/5/2022	0.5	L210	Review M Drake email re stipulated schedule, docket initial dates and email with J Gionnette re same	\$450.00	\$225.00
Rios, Sophia M	1/5/2022	6.1	L300	Draft amended complaint.	\$710.00	\$4,331.00
Hibray, Jean	1/10/2022	0.1	L140	Draft [REDACTED] for attorney review.	\$450.00	\$45.00
Rios, Sophia M	1/10/2022	0.9	L100	Draft amended complaint.	\$710.00	\$639.00
Drake, Eleanor Michelle	1/10/2022	0.8	L210	review redline and revise draft amended complaint	\$1,180.00	\$944.00
Hibray, Jean	1/11/2022	0.1	L140	Emails re calendar appointments	\$450.00	\$45.00
Rios, Sophia M	1/11/2022	1.3	L100	email client; discuss [REDACTED] with co-counsel; contact [REDACTED]	\$710.00	\$923.00
Rios, Sophia M	1/12/2022	1.3	L100	Review [REDACTED]; revise amended complaint; talk with client.	\$710.00	\$923.00
Rios, Sophia M	1/13/2022	2.4	L100	Discuss amended complaint with co-counsel; revise amended complaint	\$710.00	\$1,704.00
Drake, Eleanor Michelle	1/13/2022	0.2	L210	revise amended complaint	\$1,180.00	\$236.00
Drake, Eleanor Michelle	1/13/2022	0.7	L120	call with S. Rios, B Terrell, J. Murray re amended complaint	\$1,180.00	\$826.00
Drake, Eleanor Michelle	1/13/2022	0.3	L120	review research on [REDACTED]	\$1,180.00	\$354.00
Drake, Eleanor Michelle	1/13/2022	0.6	L210	review revised pleading prior to call with co-counsel	\$1,180.00	\$708.00
Rios, Sophia M	1/14/2022	2.3	L100	Review [REDACTED]; correspond with [REDACTED] talk with client; send email to the team.	\$710.00	\$1,633.00
Drake, Eleanor Michelle	1/14/2022	0.8	L210	review and redline proposed amended complaint	\$1,180.00	\$944.00
Rios, Sophia M	1/17/2022	0.4	L100	Finalize amended complaint and provide redline to EMD.	\$710.00	\$284.00
Rios, Sophia M	1/17/2022	0.4	L100	Finalize amended complaint and provide redline to EMD.	\$710.00	\$284.00
Drake, Eleanor Michelle	1/17/2022	0.3	L210	review redline and clean complaint, transmit to OC per agreement	\$1,180.00	\$354.00
Rios, Sophia M	1/19/2022	0.3	L100	Draft [REDACTED] client.	\$710.00	\$213.00
Rios, Sophia M	1/20/2022	0.6	L100	Call with client.	\$710.00	\$426.00
Drake, Eleanor Michelle	1/26/2022	0.2	L210	review, redline and revise proposed stipulation re filing amended complaint	\$1,180.00	\$236.00
Rios, Sophia M	2/1/2022	0.1	L100	Review edits to joint stipulation re amended complaint.	\$710.00	\$71.00
Gionnette, Julie	2/1/2022	0.1	L140	download and review docket entries	\$285.00	\$28.50
Hibray, Jean	2/8/2022	0.2	L210	Review stipulated deadlines, calendar same	\$450.00	\$90.00
Gionnette, Julie	2/8/2022	0.2	L140	download and review stipulated motion and order	\$285.00	\$57.00
Rios, Sophia M	2/8/2022	0.1	L100	Review schedule for briefing motion to dismiss.	\$710.00	\$71.00
Gionnette, Julie	2/9/2022	0.1	L140	download and review docket entry	\$285.00	\$28.50
Drake, Eleanor Michelle	2/9/2022	0.1	L120	team meeting to discuss next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	2/17/2022	0.5	L100	Attend meet and confer re motion to dismiss; draft email re same to team.	\$710.00	\$355.00
Drake, Eleanor Michelle	2/17/2022	0.5	L240	emails with cocounsel re [REDACTED]	\$1,180.00	\$590.00
Gionnette, Julie	2/23/2022	0.2	L140	download and review motion to dismiss	\$285.00	\$57.00
Rios, Sophia M	3/2/2022	0.8	L240	Draft opposition to motions to dismiss.	\$710.00	\$568.00
Rios, Sophia M	3/3/2022	3.3	L240	Draft opposition to motions to dismiss.	\$710.00	\$2,343.00
Rios, Sophia M	3/4/2022	4.4	L240	Draft opposition to motions to dismiss.	\$710.00	\$3,124.00
Rios, Sophia M	3/7/2022	2.8	L240	Draft opposition to motion to dismiss.	\$710.00	\$1,988.00

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Rios, Sophia M	3/8/2022	2.6	L240	Draft opposition to motion to dismiss.	\$710.00	\$1,846.00
Rios, Sophia M	3/9/2022	1.5	L240	Draft opposition to motion to dismiss.	\$710.00	\$1,065.00
Rios, Sophia M	3/10/2022	1.2	L240	Draft opposition to motion to dismiss.	\$710.00	\$852.00
Rios, Sophia M	3/11/2022	0.6	L240	Draft opposition to motion to dismiss.	\$710.00	\$426.00
Drake, Eleanor Michelle	3/11/2022	3.6	L240	review redline and revise response to motion to dismiss	\$1,180.00	\$4,248.00
Drake, Eleanor Michelle	3/14/2022	1	L240	call with J Murray and S Rios re [REDACTED]	\$1,180.00	\$1,180.00
Drake, Eleanor Michelle	3/14/2022	1.2	L240	review redline and revise motion to dismiss response	\$1,180.00	\$1,416.00
Rios, Sophia M	3/14/2022	3.7	L240	Draft opposition to motion to dismiss and call with cocounsel re [REDACTED].	\$710.00	\$2,627.00
Rios, Sophia M	3/15/2022	0.5	L240	Draft opposition to motion to dismiss.	\$710.00	\$355.00
Drake, Eleanor Michelle	3/17/2022	0.1	L100	check in meeting with team re upcoming deadlines and next steps	\$1,180.00	\$118.00
Gionnette, Julie	3/30/2022	0.2	L140	download and review MTD reply	\$285.00	\$57.00
Rios, Sophia M	3/30/2022	0.2	L240	Review reply ISO MTD	\$710.00	\$142.00
Rios, Sophia M	4/5/2022	0.6	L300	Review and revise joint CMC statement; schedule CMC	\$710.00	\$426.00
Rios, Sophia M	4/6/2022	1	L300	Rule 26(f) conference.	\$710.00	\$710.00
Drake, Eleanor Michelle	4/6/2022	0.1	L120	team meeting to discuss next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	4/7/2022	0.2	L300	Discuss discovery schedule with team	\$710.00	\$142.00
Rios, Sophia M	4/8/2022	0.6	L300	Discuss discovery schedule with team and response to defendant	\$710.00	\$426.00
Hibray, Jean	4/8/2022	0.3	L210	Draft initial disclosures	\$450.00	\$135.00
Rios, Sophia M	4/12/2022	0.4	L300	Draft initial disclosures	\$710.00	\$284.00
Rios, Sophia M	4/13/2022	3.5	L300	Draft discovery for defendant; finalize and send initial disclosures.	\$710.00	\$2,485.00
Hibray, Jean	4/13/2022	0.2	L300	Finalize initial disclosures, review rules on POS, prepare same, e-serve.	\$450.00	\$90.00
Hibray, Jean	4/13/2022	0.1	L300	Email with R Brooks re mailing copy of initial disclosures	\$450.00	\$45.00
Hibray, Jean	4/13/2022	0.2	L210	Review and docket notices of appearance for new opposing	\$450.00	\$90.00
Rios, Sophia M	4/14/2022	0.2	L300	Review filings in WA state court.	\$710.00	\$142.00
Rios, Sophia M	4/19/2022	0.4	L250	Review edits from opposing counsel to Rule 26(f) report and propose edits to the team.	\$710.00	\$284.00
Rios, Sophia M	4/20/2022	0.3	L250	Attention to finalizing Rule 26(f) report.	\$710.00	\$213.00
Hibray, Jean	4/20/2022	0.2	L140	Draft update letters, finalize and email same	\$450.00	\$90.00
Rios, Sophia M	4/27/2022	0.2	L250	Share draft discovery with Terrell Marshall	\$710.00	\$142.00
Rios, Sophia M	4/28/2022	1.4	L250	Revise draft discovery requests	\$710.00	\$994.00
Rios, Sophia M	4/29/2022	0.2	L250	Revise draft discovery requests and serve.	\$710.00	\$142.00
Hibray, Jean	4/29/2022	0.4	L300	Finalize discovery requests, e-serve, docket responses	\$450.00	\$180.00
Drake, Eleanor Michelle	5/3/2022	0.1	L120	team meeting re next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	5/5/2022	0.6	L250	Research [REDACTED].	\$710.00	\$426.00
Rios, Sophia M	5/9/2022	0.6	L300	Attention to demand for supplemental intitial disclosures.	\$710.00	\$426.00
Rios, Sophia M	5/10/2022	1.7	L300	Research [REDACTED].	\$710.00	\$1,207.00
Drake, Eleanor Michelle	5/10/2022	0.3	L310	review and respond re initial disclosures	\$1,180.00	\$354.00
Rios, Sophia M	5/11/2022	0.4	L300	Draft supplemental initial disclosures; call with client.	\$710.00	\$284.00
Rios, Sophia M	5/13/2022	0.4	L300	Draft supplemental initial disclosures; call with client.	\$710.00	\$284.00
Rios, Sophia M	5/16/2022	0.4	L300	Follow up with client re [REDACTED] attention to hearing on MTS	\$710.00	\$284.00
Rios, Sophia M	5/18/2022	1.4	L300	Draft supplemental intitial disclosures; call with team.	\$710.00	\$994.00
Drake, Eleanor Michelle	5/18/2022	1	L310	call with cocounsel re initial disclosures and telephonic hearing on motion to stay discovery	\$1,180.00	\$1,180.00
Hibray, Jean	5/19/2022	0.1	L300	Finalize & e-serve supplemental disclosures	\$450.00	\$45.00
Rios, Sophia M	5/19/2022	0.2	L300	Attention to serving supplemental intitial disclosures.	\$710.00	\$142.00
Rios, Sophia M	5/23/2022	0.5	L300	Review [REDACTED].	\$710.00	\$355.00
Hibray, Jean	5/23/2022	0.8	L300	Review [REDACTED], email M Drake re same	\$450.00	\$360.00
Drake, Eleanor Michelle	5/23/2022	1.4	L350	prepare for hearing on D request to stay discovery	\$1,180.00	\$1,652.00
Drake, Eleanor Michelle	5/23/2022	0.3	L350	review White v Skagit, send to oc as authority we will cite at hearing, request reciprocal sharing	\$1,180.00	\$354.00
Drake, Eleanor Michelle	5/24/2022	1.4	L250	prepare for hearing on D request to stay discovery	\$1,180.00	\$1,652.00
Drake, Eleanor Michelle	5/24/2022	0.9	L250	attend and argue at hearing on D request to stay discovery, follow up call with cocounsel after	\$1,180.00	\$1,062.00

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Hibray, Jean	6/3/2022	0.2	L320	Prep [REDACTED], email re same	\$450.00	\$90.00
Drake, Eleanor Michelle	6/3/2022	0.1	L120	call with entire litigation team re case status, upcoming deadlines and next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	6/6/2022	1.3	L300	Review and revise draft protective order	\$710.00	\$923.00
Rios, Sophia M	6/7/2022	0.4	L300	Review and revise draft protective order	\$710.00	\$284.00
Rios, Sophia M	6/8/2022	0.2	L300	Send revised protective order to defendant	\$710.00	\$142.00
Rios, Sophia M	6/29/2022	0.2	L300	Email defendant re protective order	\$710.00	\$142.00
Rios, Sophia M	7/7/2022	0.1	L120	team meeting re next steps	\$710.00	\$71.00
Drake, Eleanor Michelle	7/7/2022	0.1	L120	team meeting re case status, upcoming deadlines, and next steps in litigation	\$1,180.00	\$118.00
Drake, Eleanor Michelle	7/11/2022	0.5	L250	review redline and revise proposed protective order	\$1,180.00	\$590.00
Gionnette, Julie	7/20/2022	0.2	L140	download and review docket entries	\$285.00	\$57.00
Hibray, Jean	7/29/2022	0.2	L320	Email re docs, download same	\$450.00	\$90.00
Gionnette, Julie	7/29/2022	0.1	L140	download and review protective order	\$285.00	\$28.50
Rios, Sophia M	8/2/2022	0.1	L120	team meeting re next steps	\$710.00	\$71.00
Drake, Eleanor Michelle	8/2/2022	0.1	L120	team meeting to discuss next steps in litigation and upcoming deadlines	\$1,180.00	\$118.00
Hibray, Jean	8/3/2022	0.1	L320	Emails re [REDACTED]	\$450.00	\$45.00
Gionnette, Julie	8/3/2022	0.1	L140	download and review docket entry	\$285.00	\$28.50
Rios, Sophia M	8/3/2022	0.4	L240	Review order on Motion to Dismiss	\$710.00	\$284.00
Drake, Eleanor Michelle	8/3/2022	0.5	L240	review opinion on motion to dismiss, email team re next steps	\$1,180.00	\$590.00
Hibray, Jean	8/4/2022	0.3	L320	Transfer prod, set up intake [REDACTED]	\$450.00	\$135.00
Gionnette, Julie	8/5/2022	0.2	L140	review ECF 60 post ruling on MTD; calendar deadlines	\$285.00	\$57.00
Rios, Sophia M	8/5/2022	1	L300	Review upcoming deadlines and discovery requests; coordinate call with co-counsel	\$710.00	\$710.00
Rios, Sophia M	8/10/2022	0.5	L120	Call re next steps w/ co counsel	\$710.00	\$355.00
Rios, Sophia M	8/10/2022	1.3	L300	Review documents produced by Defendant	\$710.00	\$923.00
Drake, Eleanor Michelle	8/10/2022	0.7	L120	call with cocounsel to discuss [REDACTED]	\$1,180.00	\$826.00
Drake, Eleanor Michelle	8/10/2022	1.3	L310	begin reviewing [REDACTED]	\$1,180.00	\$1,534.00
Rios, Sophia M	8/15/2022	0.3	L300	Respond to co-counsel re [REDACTED]	\$710.00	\$213.00
Rios, Sophia M	8/16/2022	0.3	L300	Review and revise proposed schedule	\$710.00	\$213.00
Gionnette, Julie	8/17/2022	0.1	L140	download and review answer to complaint	\$285.00	\$28.50
Rios, Sophia M	8/29/2022	0.6	L300	Edit joint discovery plan.	\$710.00	\$426.00
Rios, Sophia M	8/31/2022	0.7	L300	Edit joint discovery plan.	\$710.00	\$497.00
Gionnette, Julie	9/2/2022	0.1	L140	download and review docket entry	\$285.00	\$28.50
Rios, Sophia M	9/2/2022	0.1	L300	Attention to filing joint discovery plan	\$710.00	\$71.00
Rios, Sophia M	9/6/2022	0.1	L300	Attention to Defendant's discovery deadlines	\$710.00	\$71.00
Drake, Eleanor Michelle	9/12/2022	0.1	L120	team meeting re next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	9/13/2022	0.2	L300	Email Defendant re late discovery responses	\$710.00	\$142.00
Rios, Sophia M	9/14/2022	0.2	L300	Email co-counsel re late discovery responses	\$710.00	\$142.00
Rios, Sophia M	9/15/2022	0.2	L300	Review email from defense counsel re discovery	\$710.00	\$142.00
Rios, Sophia M	9/16/2022	0.2	L300	Attention to Defendant's discovery deadlines	\$710.00	\$142.00
Gionnette, Julie	9/20/2022	0.1	L140	update calendar deadline for def discovery responses per email	\$285.00	\$28.50
Hibray, Jean	9/30/2022	0.3	L320	Emails with opposing re production downloads, retrieve same, submit to Ricoh	\$450.00	\$135.00
Rios, Sophia M	10/6/2022	0.4	L300	Review production and defendant discovery responses.	\$710.00	\$284.00
Drake, Eleanor Michelle	10/6/2022	0.1	L120	team meeting re next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	10/7/2022	4.7	L300	Draft letter to OC re defendant discovery responses.	\$710.00	\$3,337.00
Rios, Sophia M	10/10/2022	1	L300	Meet with co-counsel re defendant discovery responses.	\$710.00	\$710.00
Drake, Eleanor Michelle	10/10/2022	1	L300	call with cocounsel re [REDACTED]	\$1,180.00	\$1,180.00
Rios, Sophia M	10/11/2022	5.7	L300	Draft letter to OC re defendant discovery responses; [REDACTED].	\$710.00	\$4,047.00
Rios, Sophia M	10/12/2022	5.9	L300	Draft letter to OC re defendant discovery responses; [REDACTED].	\$710.00	\$4,189.00
Drake, Eleanor Michelle	10/12/2022	0.8	L110	review S Rios memo [REDACTED] begin drafting supplement and response	\$1,180.00	\$944.00

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Rios, Sophia M	10/14/2022	1.1	L300	Investigate ██████████; revise letter to opposing counsel re data	\$710.00	\$781.00
Hibray, Jean	10/17/2022	0.1	L300	Finalize RFPs II with Ex A, e-serve same; docket response	\$450.00	\$45.00
Rios, Sophia M	10/17/2022	2.5	L300	Revise letter to opposing counsel re data and send.	\$710.00	\$1,775.00
Rios, Sophia M	10/21/2022	0.6	L300	Revise letter re non-data discovery responses and send to team.	\$710.00	\$426.00
Drake, Eleanor Michelle	10/24/2022	0.6	L300	review redline and revise drfat letter to oc re non-data discovery	\$1,180.00	\$708.00
Rios, Sophia M	10/26/2022	1.1	L300	Meet and confer with opposing counsel re data requests	\$710.00	\$781.00
Rios, Sophia M	10/27/2022	0.5	L300	Revise letter re non-data discovery responses and send to defendant.	\$710.00	\$355.00
Hibray, Jean	10/28/2022	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Drake, Eleanor Michelle	11/2/2022	0.1	L120	team meeting re next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	11/8/2022	1.1	L300	Meet and confer with opposing counsel.	\$710.00	\$781.00
Rios, Sophia M	11/18/2022	0.3	L300	Draft email to opposing counsel re outstanding discovery requests.	\$710.00	\$213.00
Hibray, Jean	11/21/2022	0.1	L140	Draft ████████ letter	\$450.00	\$45.00
Hibray, Jean	11/23/2022	0.2	L140	Prepare and send ████████ letters	\$450.00	\$90.00
Rios, Sophia M	12/1/2022	1	L300	Draft email to opposing counsel re outstanding discovery requests.	\$710.00	\$710.00
Rios, Sophia M	12/5/2022	1.5	L300	Draft email to opposing counsel re outstanding discovery requests.	\$710.00	\$1,065.00
Gionnette, Julie	12/7/2022	0.1	L140	download and review docket entries	\$285.00	\$28.50
Rios, Sophia M	12/9/2022	1.5	L300	Review schedule and upcoming tasks	\$710.00	\$1,065.00
Drake, Eleanor Michelle	12/12/2022	0.2	L120	team meeting to discuss upcoming deadlines and approach	\$1,180.00	\$236.00
Rios, Sophia M	12/13/2022	0.6	L300	Attention to discovery requests from Defendant to Plaintiffs; revise draft letter to defendant and proposed joint motion	\$710.00	\$426.00
Gionnette, Julie	12/13/2022	0.3	L140	review and save to iManage defendants ROGS and RFPs on plaintiffs; calendar response deadlines	\$285.00	\$85.50
Rios, Sophia M	12/14/2022	0.4	L300	review and revise joint motion	\$710.00	\$284.00
Hibray, Jean	12/16/2022	0.5	L300	Begin drafting objections to discovery requests	\$450.00	\$225.00
Hibray, Jean	12/19/2022	0.5	L300	Prepare objections to written discovery for Moore	\$450.00	\$225.00
Hibray, Jean	12/20/2022	0.1	L140	Prepare ████████	\$450.00	\$45.00
Rios, Sophia M	12/20/2022	2.1	L300	Draft discovery responses.	\$710.00	\$1,491.00
Hibray, Jean	12/21/2022	0.3	L300	Prepare Gillette version of response/objections	\$450.00	\$135.00
Rios, Sophia M	12/21/2022	2.3	L300	Call with client; draft discovery responses; follow up with ESI vendor	\$710.00	\$1,633.00
Hibray, Jean	12/22/2022	0.2	L320	Review ████████, submit docs ████████	\$450.00	\$90.00
Rios, Sophia M	12/22/2022	2.8	L300	Call with client; draft discovery responses; follow up with ESI vendor	\$710.00	\$1,988.00
Rios, Sophia M	12/27/2022	4.4	L300	Draft discovery responses; ████████ with clients	\$710.00	\$3,124.00
Rios, Sophia M	1/3/2023	0.7	L300	Revise joint amendment to proposed schedule and send to OC; follow up with clients re discovery responses.	\$710.00	\$497.00
Hibray, Jean	1/5/2023	0.2	L320	Transfer ████████ for potential production	\$450.00	\$90.00
Rios, Sophia M	1/5/2023	2.9	L300	Draft discovery responses; ████████ with clients; prepare production of documents.	\$710.00	\$2,059.00
Rios, Sophia M	1/6/2023	0.9	L300	Draft discovery responses; prepare production of documents.	\$710.00	\$639.00
Hibray, Jean	1/6/2023	0.2	L320	Transfer ████████ for potential production	\$450.00	\$90.00
Drake, Eleanor Michelle	1/6/2023	0.1	L120	team meeting to review upcoming deadlines and next steps in litigation	\$1,180.00	\$118.00
Hibray, Jean	1/9/2023	0.2	L320	Review saved searches, prep production request for today	\$450.00	\$90.00
Hibray, Jean	1/9/2023	0.2	L300	PDF and send ██████████	\$450.00	\$90.00
Hibray, Jean	1/9/2023	0.2	L320	Review prods of ████████ docs	\$450.00	\$90.00
Hibray, Jean	1/9/2023	0.1	L300	Email S Rios re ██████████	\$450.00	\$45.00
Hibray, Jean	1/9/2023	0.3	L300	Finalize discovery responses, e-serve with production.	\$450.00	\$135.00
Rios, Sophia M	1/9/2023	0.1	L300	Attention to scheduling stipulation	\$710.00	\$71.00
Rios, Sophia M	1/12/2023	0.5	L300	draft scheduling stipulation; call with OC	\$710.00	\$355.00
Rios, Sophia M	1/13/2023	0.5	L300	Draft scheduling stipulation; schedule call with OC	\$710.00	\$355.00
Drake, Eleanor Michelle	1/13/2023	0.6	L210	call re ██████████	\$1,180.00	\$708.00
Rios, Sophia M	1/16/2023	0.5	L300	Draft scheduling stipulation.	\$710.00	\$355.00
Rios, Sophia M	1/18/2023	2.5	L300	Review meet and confer history and letter from opposing counsel re Plaintiffs' RFPs; draft ██████████	\$710.00	\$1,775.00
Rios, Sophia M	1/19/2023	0.6	L300	Attention to draft scheduling stipulation; review research ██████████	\$710.00	\$426.00
Gionnette, Julie	1/20/2023	0.1	L140	download and review docket entries	\$285.00	\$28.50
Rios, Sophia M	1/20/2023	0.3	L300	Email client re ██████████; finalize stipulation	\$710.00	\$213.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Rios, Sophia M	1/23/2023	1.4	L300	Discuss ██████████; draft meet and confer letter and correspond with co-counsel re discovery	\$710.00	\$994.00
Drake, Eleanor Michelle	1/23/2023	0.5	L100	call with J. Davis and S Rios re ██████████	\$1,180.00	\$590.00
Rios, Sophia M	1/25/2023	1.2	L300	Draft email to co-counsel re ██████████; email clients ██████████	\$710.00	\$852.00
Gionnette, Julie	1/26/2023	0.5	L140	download and review scheduling order; calendar all deadlines	\$285.00	\$142.50
Rios, Sophia M	1/27/2023	0.5	L300	Attention to production of documents; review court order re schedule; set up call with co-counsel re ██████████	\$710.00	\$355.00
Hibray, Jean	1/30/2023	0.3	L320	Troubleshoot retrieving new def prod, review and submit ██████████	\$450.00	\$135.00
Drake, Eleanor Michelle	1/31/2023	1	L120	call with team re next steps in litigation and upcoming deadline	\$1,180.00	\$1,180.00
Drake, Eleanor Michelle	1/31/2023	0.8	L120	review recent law re ██████████; circulate to team	\$1,180.00	\$944.00
Rios, Sophia M	1/31/2023	5.2	L300	Call with client re ██████████; schedule meet and confer with opposing counsel; review Defendant's production of documents	\$710.00	\$3,692.00
Rios, Sophia M	1/31/2023	1	L300	call with team re next steps in litigation and upcoming deadline	\$710.00	\$710.00
Rios, Sophia M	2/1/2023	1.2	L300	Finalize letter and send to opposing counsel.	\$710.00	\$852.00
Drake, Eleanor Michelle	2/2/2023	0.6	L130	cal with ██████████ and circulate memo outlining ██████████	\$1,180.00	\$708.00
Rios, Sophia M	2/2/2023	1.4	L300	Call with client re ██████████ send update to team re ██████████	\$710.00	\$994.00
Rios, Sophia M	2/2/2023	0.6	L300	call with ██████████	\$710.00	\$426.00
Rios, Sophia M	2/3/2023	0.1	L300	Schedule meet and confer with opposing counsel	\$710.00	\$71.00
Rios, Sophia M	2/8/2023	1.4	L300	Prepare for meet and confer re discovery requests; meet and confer; discuss next steps with co-counsel	\$710.00	\$994.00
Rios, Sophia M	2/10/2023	1.2	L300	Draft outline for MTC; review data production	\$710.00	\$852.00
Hibray, Jean	2/10/2023	0.2	L320	Submit new def prod ██████████	\$450.00	\$90.00
Rios, Sophia M	2/13/2023	3	L300	Draft outline for MTC and email to opposing counsel re discovery disputes; send email.	\$710.00	\$2,130.00
Rios, Sophia M	2/15/2023	0.2	L300	Review email and letter from opposing counsel.	\$710.00	\$142.00
Rios, Sophia M	2/22/2023	0.7	L300	Review email and letter from opposing counsel.	\$710.00	\$497.00
Rios, Sophia M	2/24/2023	0.5	L300	Draft response re discovery to OC	\$710.00	\$355.00
Hibray, Jean	2/27/2023	0.3	L320	Review new def prod, submit ██████████; troubleshoot access	\$450.00	\$135.00
Rios, Sophia M	2/28/2023	1.8	L300	Draft response re discovery to OC	\$710.00	\$1,278.00
Drake, Eleanor Michelle	3/4/2023	0.7	L310	emails to ██████████ re subpoena forthcoming to Season 4	\$1,180.00	\$826.00
Rios, Sophia M	3/9/2023	2.9	L300	Review subpoenas from Defendant to senders; formulate response with co-counsel; contact clients ██████████	\$710.00	\$2,059.00
Drake, Eleanor Michelle	3/9/2023	0.8	L310	call with S Rios, J Murray and J Davis re ██████████	\$1,180.00	\$944.00
Drake, Eleanor Michelle	3/9/2023	0.8	L310	call with S Rios, J Murray and J Davis re ██████████	\$1,180.00	\$944.00
Hibray, Jean	3/10/2023	0.2	L300	Review defendant's subpoenas, docket same	\$450.00	\$90.00
Drake, Eleanor Michelle	3/10/2023	0.7	L310	call with ██████████	\$1,180.00	\$826.00
Drake, Eleanor Michelle	3/10/2023	0.7	L310	call with ██████████	\$1,180.00	\$826.00
Rios, Sophia M	3/13/2023	2.5	L300	Draft letter to OC re Plaintiffs' discovery responses; send email to OC re discovery issues; discuss ██████████	\$710.00	\$1,775.00
Hibray, Jean	3/14/2023	0.2	L210	Review subpoena to Season4, docketing re same	\$450.00	\$90.00
Drake, Eleanor Michelle	3/14/2023	4.8	L310	research and begin drafting plaintiffs' motion to quash for filing in SDNY	\$1,180.00	\$5,664.00
Drake, Eleanor Michelle	3/15/2023	1.3	L350	work on motion to quash on behalf of plaintiffs	\$1,180.00	\$1,534.00
Drake, Eleanor Michelle	3/15/2023	1.7	L350	research ██████████; circulate research and draft memos to ██████████	\$1,180.00	\$2,006.00
Hibray, Jean	3/15/2023	0.1	L210	Review notes on motion to quash, email re SDNY	\$450.00	\$45.00
Hibray, Jean	3/15/2023	0.2	L320	Review def prod, submit to Ricoh	\$450.00	\$90.00
Hibray, Jean	3/15/2023	0.2	L210	Draft ██████████	\$450.00	\$90.00
Rios, Sophia M	3/15/2023	3.3	L300	Draft ██████████; send to ██████████ clients and ██████████ meet and confer with OC re discovery requests to Plaintiffs	\$710.00	\$2,343.00
Drake, Eleanor Michelle	3/16/2023	1.2	L350	review redline and revise ██████████ motion to quash	\$1,180.00	\$1,416.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Hibray, Jean	3/16/2023	0.3	L210	Finalize and send [REDACTED]	\$450.00	\$135.00
Rios, Sophia M	3/16/2023	0.8	L300	Call with client; correspond with client re [REDACTED]	\$710.00	\$568.00
Hibray, Jean	3/17/2023	0.1	L210	Update [REDACTED] with exhibit	\$450.00	\$45.00
Hibray, Jean	3/17/2023	0.1	L210	Emails re motion to quash	\$450.00	\$45.00
Gionnette, Julie	3/17/2023	0.1	L140	review emails re hearing on discovery dispute; calendar same	\$285.00	\$28.50
Rios, Sophia M	3/17/2023	5.4	L300	Draft motion to quash Season4 subpoena; correspond with Plaintiffs re [REDACTED]	\$710.00	\$3,834.00
Rios, Sophia M	3/19/2023	2.4	L300	Prepare for discovery hearing	\$710.00	\$1,704.00
Hibray, Jean	3/20/2023	0.4	L320	Review new def prods, submit to Ricoh	\$450.00	\$180.00
Hibray, Jean	3/20/2023	0.6	L210	Submit requests for certs of good standing, draft pro hac papers	\$450.00	\$270.00
Rios, Sophia M	3/20/2023	2.5	L300	Draft motions to quash Season4 subpoena	\$710.00	\$1,775.00
Drake, Eleanor Michelle	3/20/2023	2.6	L310	review redline and final revision of Plaintiffs and BMPC motions to quash	\$1,180.00	\$3,068.00
Hibray, Jean	3/21/2023	0.5	L210	Emails re local rules, procedures, check up on same	\$450.00	\$225.00
Hibray, Jean	3/21/2023	1.5	L210	Proof, format memos ISO motions to quash (2)	\$450.00	\$675.00
Hibray, Jean	3/21/2023	0.5	L210	Draft Drake Decl, pull exhibits, draft prop order, motions	\$450.00	\$225.00
Hibray, Jean	3/21/2023	0.3	L210	Emails with team re today's filings	\$450.00	\$135.00
Hibray, Jean	3/21/2023	0.8	L210	Input tables in both briefs, finalize all motion papers	\$450.00	\$360.00
Hibray, Jean	3/21/2023	0.7	L210	Initiate two motion to quash dockets, docket papers, finalize and docket pro hacs, prep cover sheets and file same	\$450.00	\$315.00
Hibray, Jean	3/21/2023	0.2	L210	E-serve opposing counsel with motions to quash	\$450.00	\$90.00
Rios, Sophia M	3/21/2023	2.5	L300	Review and revise motions to quash Season4 subpoena; prepare for filing; prepare for court hearing	\$710.00	\$1,775.00
Drake, Eleanor Michelle	3/21/2023	2.3	L310	final review redline and revise Season 4 motion to quash, emails with S4 counsel re [REDACTED]	\$1,180.00	\$2,714.00
Hibray, Jean	3/22/2023	0.5	L210	Review SDNY remarks, emails with team, call with M Drake	\$450.00	\$225.00
Hibray, Jean	3/22/2023	0.8	L210	Re-file motions to quash (2) in separate pieces	\$450.00	\$360.00
Hibray, Jean	3/22/2023	0.5	L210	Update pro hac papers, re file on both dockets	\$450.00	\$225.00
Hibray, Jean	3/22/2023	0.3	L210	Review judge assignments and their procedures	\$450.00	\$135.00
Hibray, Jean	3/22/2023	0.3	L210	Draft letter re related cases, file on both dockets	\$450.00	\$135.00
Hibray, Jean	3/22/2023	0.3	L210	E-serve opposing with all filings, prepare and file certs re same	\$450.00	\$135.00
Hibray, Jean	3/22/2023	0.1	L210	Docketing of deadlines	\$450.00	\$45.00
Gionnette, Julie	3/22/2023	0.4	L140	download and review docket entries re motions to quash in SDNY	\$285.00	\$114.00
Rios, Sophia M	3/22/2023	3.9	L300	Prepare for court hearing re plaintiffs' motion to compel; appear at court hearing; prepare follow up letter to OC	\$710.00	\$2,769.00
Hibray, Jean	3/23/2023	0.5	L210	Review WD Wash rules for transcripts, emails re same; prepare and file order form	\$450.00	\$225.00
Hibray, Jean	3/23/2023	0.6	L210	Research caselaw on [REDACTED]	\$450.00	\$270.00
Hibray, Jean	3/23/2023	0.2	L210	Draft letter motion for replies/briefing reset	\$450.00	\$90.00
Gionnette, Julie	3/23/2023	0.3	L140	download and review docket entry; download and review order re Plaintiffs Mtn to Quash; calendar hearing and deadline	\$285.00	\$85.50
Rios, Sophia M	3/23/2023	2.7	L300	Draft letter to OC re proposed data sample requests; review productions	\$710.00	\$1,917.00
Gionnette, Julie	3/24/2023	0.6	L210	finalize letter motion re briefing schedule; file in SDNY in both Plaintiffs and BMPC cases; download and save same to iManage; email letter to judge and all counsel	\$285.00	\$171.00
Rios, Sophia M	3/24/2023	1.8	L300	Draft letter to OC re proposed data sample requests; review productions; send to co-counsel	\$710.00	\$1,278.00
Rios, Sophia M	3/24/2023	1	L300	Draft letter to court re corrinating MTQs (SDNY); communicate with counsel for Season4 and Robinhood; prepare for filing	\$710.00	\$710.00
Hibray, Jean	3/24/2023	0.3	L210	Emails re letter filing coverage	\$450.00	\$135.00
Gionnette, Julie	3/27/2023	0.4	L140	download and review order re consolidation; calendar deadlines	\$285.00	\$114.00
Rios, Sophia M	3/27/2023	1.3	L300	Calls with clients re [REDACTED]; send follow up emails	\$710.00	\$923.00
Rios, Sophia M	3/27/2023	4	L300	Draft supplemental discovery responses; draft letter to OC re plaintiffs' discovery responses; review [REDACTED]; revise letter regarding Plaintiffs' data requests and proposed search terms.	\$710.00	\$2,840.00
Rios, Sophia M	3/28/2023	2.6	L300	Draft supplemental discovery responses; draft letter to OC re plaintiffs' discovery responses; review and revise subpoena to Verizon; draft proposed search terms and include in letter to OC re data requests; review [REDACTED]	\$710.00	\$1,846.00
Hibray, Jean	3/29/2023	0.3	L210	Review order on consolidation, calendaring	\$450.00	\$135.00
Hibray, Jean	3/29/2023	0.6	L300	Emails and calls with R Gebo, S Rios, IT re [REDACTED]	\$450.00	\$270.00

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Hibray, Jean	3/29/2023	0.5	L300	Searches of [REDACTED].	\$450.00	\$225.00
Hibray, Jean	3/29/2023	0.3	L300	Begin draft of privilege log	\$450.00	\$135.00
Hibray, Jean	3/29/2023	0.4	L300	Proof supplemental responses, email clients re [REDACTED], send same.	\$450.00	\$180.00
Hibray, Jean	3/29/2023	0.3	L320	Review exports, submit [REDACTED] for processing	\$450.00	\$135.00
Rios, Sophia M	3/29/2023	0.5	L300	review documents [REDACTED]; prepare production of documents; coordinate paralegal help	\$710.00	\$355.00
Hibray, Jean	3/30/2023	0.2	L320	Review new def prod, submit [REDACTED]	\$450.00	\$90.00
Rios, Sophia M	3/30/2023	0.5	L300	Meet and confer with opposing counsel re discovery and schedule	\$710.00	\$355.00
Rios, Sophia M	3/30/2023	1	L300	Prepare production of documents; review [REDACTED]	\$710.00	\$710.00
Hibray, Jean	3/31/2023	0.4	L300	Finalize supplemental responses, e-serve same	\$450.00	\$180.00
Hibray, Jean	3/31/2023	0.2	L320	Load [REDACTED] to Rel.	\$450.00	\$90.00
Hibray, Jean	3/31/2023	0.8	L320	Begin review docs for privilege log, set up searches, troubleshoot same	\$450.00	\$360.00
Rios, Sophia M	3/31/2023	0.8	L300	[REDACTED] with clients; review documents [REDACTED]; prepare production of documents	\$710.00	\$568.00
Hibray, Jean	4/3/2023	0.9	L300	Finish [REDACTED] priv review, prepare log draft, prepare [REDACTED] for S Rios review	\$450.00	\$405.00
Hibray, Jean	4/3/2023	0.3	L320	Review and submit production request; respond to confirmation request	\$450.00	\$135.00
Hibray, Jean	4/3/2023	0.3	L320	Spot check prod, e-serve on opposing	\$450.00	\$135.00
Rios, Sophia M	4/3/2023	0.2	L300	Prepare production of documents	\$710.00	\$142.00
Rios, Sophia M	4/5/2023	0.3	L300	Review third party documents	\$710.00	\$213.00
Hibray, Jean	4/6/2023	0.3	L320	Review def prods, submit to Rel	\$450.00	\$135.00
Rios, Sophia M	4/6/2023	0.8	L300	Review third party documents	\$710.00	\$568.00
Rios, Sophia M	4/10/2023	0.9	L300	Draft scheduling proposal re discovery extension	\$710.00	\$639.00
Hibray, Jean	4/12/2023	0.2	L210	Docket def's mtn to quash opposition	\$450.00	\$90.00
Gionnette, Julie	4/13/2023	0.2	L140	download and review docket entries; review calendar deadlines per S. Rios	\$285.00	\$57.00
Hibray, Jean	4/13/2023	0.5	L210	Review procedures, draft stipulated extension request	\$450.00	\$225.00
Rios, Sophia M	4/13/2023	1	L300	Draft stipulation re proposal re discovery extension	\$710.00	\$710.00
Rios, Sophia M	4/13/2023	1.5	L350	Draft reply ISO motion to quash	\$710.00	\$1,065.00
Hibray, Jean	4/14/2023	0.4	L210	Emails re transcript from hearing	\$450.00	\$180.00
Rios, Sophia M	4/14/2023	6.4	L350	Draft reply ISO motion to quash	\$710.00	\$4,544.00
Rios, Sophia M	4/15/2023	1.5	L350	Draft reply ISO motion to quash	\$710.00	\$1,065.00
Gionnette, Julie	4/17/2023	0.1	L140	download and review docket entry in SDNY case; download and review docket entry in WA case	\$285.00	\$28.50
Rios, Sophia M	4/17/2023	2.8	L350	Draft reply ISO motion to quash	\$710.00	\$1,988.00
Drake, Eleanor Michelle	4/17/2023	0.6	L120	meet with Z Vaughan re [REDACTED]	\$1,180.00	\$708.00
Drake, Eleanor Michelle	4/17/2023	2.3	L350	review redline and revise BMPC reply on motion to quash	\$1,180.00	\$2,714.00
Gionnette, Julie	4/18/2023	0.4	L140	download and review scheduling order; update all calendar deadlines	\$285.00	\$114.00
Gionnette, Julie	4/18/2023	0.1	L140	download and review docket entry	\$285.00	\$28.50
Rios, Sophia M	4/18/2023	2.7	L350	review and revise replies ISO motion to quash	\$710.00	\$1,917.00
Hibray, Jean	4/18/2023	0.4	L210	Draft Z Vaughan pro hac, emails re requested edits and input same	\$450.00	\$180.00
Hibray, Jean	4/18/2023	0.3	L210	Email re final pro hac; complete ECF registration	\$450.00	\$135.00
Hibray, Jean	4/18/2023	0.3	L140	Update all calendar appointments to accommodate Z Vaughan	\$450.00	\$135.00
Gionnette, Julie	4/19/2023	0.2	L140	download and review docket entries	\$285.00	\$57.00
Rios, Sophia M	4/19/2023	1.5	L350	review and revise replies ISO motion to quash; prepare court filing	\$710.00	\$1,065.00
Hibray, Jean	4/19/2023	2	L210	Proof, format replies (2) in support of motions to quash. Input tables. Finalize and file. Email courtesy copies	\$450.00	\$900.00
Drake, Eleanor Michelle	4/19/2023	1.3	L350	review redline and revise BMPC reply in support of motion to quash	\$1,180.00	\$1,534.00
Drake, Eleanor Michelle	4/19/2023	1.3	L350	comment and revise Season 4 reply in support of motion to quash	\$1,180.00	\$1,534.00
Gionnette, Julie	4/20/2023	0.2	L140	download and review docket entries in SDNY cases	\$285.00	\$57.00
Drake, Eleanor Michelle	4/24/2023	3.4	L350	prepare for hearing re motions to quash	\$1,180.00	\$4,012.00
Drake, Eleanor Michelle	4/24/2023	1	L350	argue at hearing on motions to quash-[REDACTED]	\$1,180.00	\$1,180.00
Vaughan, Zachary M	4/24/2023	1.7	L230	Attend telephonic hearing re motions to quash	\$740.00	\$1,258.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Hibray, Jean	4/24/2023	0.1	L210	Check docket for hearing info, email team	\$450.00	\$45.00
Hibray, Jean	4/24/2023	0.2	L210	Emails re hearing transcript, dockets	\$450.00	\$90.00
Rios, Sophia M	4/24/2023	2.1	L350	Attend hearing on motions to quash; discuss next steps with EMD	\$710.00	\$1,491.00
Rios, Sophia M	4/25/2023	1.5	L300	Draft privilege log	\$710.00	\$1,065.00
Gionnette, Julie	4/26/2023	0.1	L140	download and review docket entries	\$285.00	\$28.50
Hibray, Jean	4/26/2023	0.7	L100	Call with chambers re hearing; review transcript ordering procedures, submit order	\$450.00	\$315.00
Hibray, Jean	4/26/2023	0.2	L300	Review texts, update priv log	\$450.00	\$90.00
Rios, Sophia M	4/27/2023	0.3	L300	finalize draft privilege log and send to co-counsel	\$710.00	\$213.00
Rios, Sophia M	4/28/2023	1.1	L310	Review defendant's discovery responses	\$710.00	\$781.00
Hibray, Jean	5/1/2023	0.1	L210	Email re transcript	\$450.00	\$45.00
Hibray, Jean	5/5/2023	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Gionnette, Julie	5/8/2023	0.1	L140	download and review docket entry	\$285.00	\$28.50
Hibray, Jean	5/8/2023	0.2	L300	Format priv logs for production, email with S Rios re same	\$450.00	\$90.00
Hibray, Jean	5/8/2023	0.2	L300	Finalize priv logs, e-serve on opposing	\$450.00	\$90.00
Rios, Sophia M	5/8/2023	4.7	L310	Analyze defendant's discovery responses and prepare for meet and confer; conduct meet and confer with Defendant; draft summary to team; draft additional diccovery requests	\$710.00	\$3,337.00
Gionnette, Julie	5/9/2023	0.1	L140	download and review docket entry	\$285.00	\$28.50
Rios, Sophia M	5/9/2023	0.6	L310	Review documents ██████████ confer with co counsel re same	\$710.00	\$426.00
Rios, Sophia M	5/12/2023	0.9	L300	Email with opposing counsel re search terms for Plaintiffs' devices; review and analyze data production proposal from Defendant	\$710.00	\$639.00
Rios, Sophia M	5/15/2023	0.7	L300	Meet and confer with OC re data pull	\$710.00	\$497.00
Rios, Sophia M	5/16/2023	0.2	L300	Review search term hit report from opposing counsel	\$710.00	\$142.00
Rios, Sophia M	5/16/2023	0.1	L300	team meeting re schedule and next steps	\$710.00	\$71.00
Drake, Eleanor Michelle	5/16/2023	0.1	L120	team meeting re schedule and next steps	\$1,180.00	\$118.00
Hibray, Jean	5/19/2023	0.2	L210	Prep M DeSanto pro hac, email with local re same	\$450.00	\$90.00
Hibray, Jean	5/19/2023	0.9	L300	Proof, finalize and eserve RFP, Irogs	\$450.00	\$405.00
Gionnette, Julie	5/19/2023	0.1	L140	download and review docket entries	\$285.00	\$28.50
Rios, Sophia M	5/19/2023	1.4	L300	Review search term hit report from opposing counsel	\$710.00	\$994.00
Rios, Sophia M	5/23/2023	0.3	L120	Discuss updates and next steps with EMD and MD	\$710.00	\$213.00
Rios, Sophia M	5/23/2023	1.7	L300	Review search term hit report from opposing counsel and draft response	\$710.00	\$1,207.00
Drake, Eleanor Michelle	5/23/2023	0.4	L120	meet with S Rios and M. DeSanto re status of case and next steps in litigation	\$1,180.00	\$472.00
Hibray, Jean	5/25/2023	0.2	L320	Review new def prod, submit to Rel	\$450.00	\$90.00
Rios, Sophia M	5/25/2023	0.2	L300	Review search term hit report and email opposing counsel	\$710.00	\$142.00
Rios, Sophia M	6/1/2023	3.5	L300	Reseach ██████████ draft responsive email; prepare for third party deposition	\$710.00	\$2,485.00
Rios, Sophia M	6/2/2023	0.5	L300	Prepare for third party deposition	\$710.00	\$355.00
Drake, Eleanor Michelle	6/2/2023	0.6	L330	call with S Rios and J Murray re ██████████	\$1,180.00	\$708.00
Rios, Sophia M	6/4/2023	0.5	L300	Prepare for third party deposition	\$710.00	\$355.00
Rios, Sophia M	6/5/2023	2.4	L300	Attend third party deposition	\$710.00	\$1,704.00
Rios, Sophia M	6/12/2023	1.9	L300	Call with ██████████; draft and send email to opposing counsel re discovery issues	\$710.00	\$1,349.00
Gionnette, Julie	6/13/2023	0.2	L140	review and save to iManage notice and subpoena of Siegel deposition; calendar same	\$285.00	\$57.00
Hibray, Jean	6/16/2023	0.3	L320	Review new prod, submit to Rel	\$450.00	\$135.00
Rios, Sophia M	6/20/2023	0.4	L300	Develop ██████████	\$710.00	\$284.00
Hibray, Jean	6/21/2023	0.2	L320	Submit ██████████ to Rel for loading	\$450.00	\$90.00
Rios, Sophia M	6/21/2023	2.2	L330	Draft 30(b)(6) Notice to Defendant	\$710.00	\$1,562.00
Rios, Sophia M	6/21/2023	1	L300	Draft and send email to Defendant re production and discovery cut off	\$710.00	\$710.00
Hibray, Jean	6/22/2023	0.2	L320	Emails re new load, re numbering	\$450.00	\$90.00
Rios, Sophia M	6/22/2023	1.4	L330	Draft 30(b)(6) Notice to Defendant	\$710.00	\$994.00
Rios, Sophia M	6/22/2023	1.3	L330	Attend Siegel deposition	\$710.00	\$923.00
Rios, Sophia M	6/23/2023	0.5	L340	Review and revise ██████████	\$710.00	\$355.00
Rios, Sophia M	6/23/2023	1.3	L300	Review letter from opposing counsel re plaintiffs' discovery responses; propose next steps to co counsel	\$710.00	\$923.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Rios, Sophia M	6/26/2023	1.8	L300	Meet and confer with OC re Plaintiff's discovery responses; review responses and consider next steps with co counsel	\$710.00	\$1,278.00
Drake, Eleanor Michelle	6/26/2023	0.1	L120	team meeting to touch base on case status	\$1,180.00	\$118.00
Drake, Eleanor Michelle	6/26/2023	1.4	L310	review redline and revise draft 30b6 deposition notice	\$1,180.00	\$1,652.00
Gionnette, Julie	6/27/2023	0.1	L140	review second amended depo notice for Siegel; update calendar	\$285.00	\$28.50
Rios, Sophia M	6/27/2023	0.5	L300	Request [REDACTED]; review correspondence from OC	\$710.00	\$355.00
Drake, Eleanor Michelle	6/28/2023	0.1	L330	correspondence related to 30b6 notice revised topics	\$1,180.00	\$118.00
Rios, Sophia M	6/28/2023	0.9	L300	Review discovery requests; email clients	\$710.00	\$639.00
Rios, Sophia M	6/28/2023	1.1	L300	Draft 30(b)(6) Notice to Defendant	\$710.00	\$781.00
Hibray, Jean	6/29/2023	0.4	L330	Finalize and e-serve 30b6 NOD; send to Lexitas to schedule	\$450.00	\$180.00
Rios, Sophia M	6/29/2023	0.4	L300	Draft 30(b)(6) Notice to Defendant	\$710.00	\$284.00
Rios, Sophia M	6/29/2023	3.6	L300	Appear at Siegel deposition.	\$710.00	\$2,556.00
Rios, Sophia M	6/29/2023	1	L300	Draft responses to discovery requests; review data [REDACTED]	\$710.00	\$710.00
Rios, Sophia M	6/29/2023	0.4	L340	Gather documents for [REDACTED]	\$710.00	\$284.00
Rios, Sophia M	6/30/2023	0.2	L300	email with clients re [REDACTED]	\$710.00	\$142.00
Rios, Sophia M	7/5/2023	1	L300	Call with client re [REDACTED]	\$710.00	\$710.00
Rios, Sophia M	7/5/2023	0.1	L340	Schedule call with [REDACTED]	\$710.00	\$71.00
Rios, Sophia M	7/6/2023	0.2	L300	Schedule call with client re [REDACTED]	\$710.00	\$142.00
Rios, Sophia M	7/6/2023	0.9	L340	Call with [REDACTED]	\$710.00	\$639.00
Hibray, Jean	7/10/2023	0.1	L320	Email with S Rios re invoices	\$450.00	\$45.00
Rios, Sophia M	7/10/2023	1	L300	Call with client re [REDACTED]; call with co-counsel re [REDACTED] responding to requests; gather documents	\$710.00	\$710.00
Gionnette, Julie	7/10/2023	1.1	L310	convert Robinhood's first set of RFAs to Cooper and Moore to Word and draft response shells	\$285.00	\$313.50
Hibray, Jean	7/11/2023	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Hibray, Jean	7/11/2023	0.1	L320	Emails re password needed	\$450.00	\$45.00
Rios, Sophia M	7/11/2023	4	L300	Call with client re [REDACTED] email with client re [REDACTED] gather [REDACTED] for production; draft records request for [REDACTED]	\$710.00	\$2,840.00
Rios, Sophia M	7/11/2023	0.2	L300	Review edits from OC to stipulation re case schedule	\$710.00	\$142.00
Gionnette, Julie	7/11/2023	0.1	L140	download and review docket entry	\$285.00	\$28.50
Gionnette, Julie	7/11/2023	0.3	L140	complete [REDACTED] send same to S. Rios	\$285.00	\$85.50
Gionnette, Julie	7/12/2023	0.7	L310	draft shell RFP and Irog responses for client's Moore and Gillette	\$285.00	\$199.50
Rios, Sophia M	7/13/2023	0.8	L300	Gather documents for production; submit records request for LNI files	\$710.00	\$568.00
Rios, Sophia M	7/13/2023	0.3	L300	review schedule for 30(b)(6); email opposing requesting dates for rescheduled deposition	\$710.00	\$213.00
Gionnette, Julie	7/13/2023	0.5	L140	download and review order granting extension of deadlines; update calendar deadlines; finalize and assemble [REDACTED] forms and send to client [REDACTED]	\$285.00	\$142.50
Hibray, Jean	7/14/2023	0.3	L320	Review pre prod loads, submit [REDACTED] with instructions	\$450.00	\$135.00
Rios, Sophia M	7/14/2023	0.3	L160	Initiate conferral re scheduling mediation	\$710.00	\$213.00
Drake, Eleanor Michelle	7/14/2023	0.5	L160	review and respond to various emails re mediator selection	\$1,180.00	\$590.00
Hibray, Jean	7/16/2023	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Hibray, Jean	7/17/2023	0.2	L330	Docket Siegel transcript	\$450.00	\$90.00
Rios, Sophia M	7/17/2023	0.3	L300	Draft responses to discovery requests	\$710.00	\$213.00
Hibray, Jean	7/18/2023	0.2	L330	Emails re Behunin transcript	\$450.00	\$90.00
Hibray, Jean	7/18/2023	0.7	L330	Begin confidentiality review of Siegel transcript	\$450.00	\$315.00
Gionnette, Julie	7/18/2023	0.8	L310	edits and formatting to RFA responses	\$285.00	\$228.00
Rios, Sophia M	7/18/2023	1.5	L300	Draft responses to discovery requests	\$710.00	\$1,065.00
Hibray, Jean	7/19/2023	0.2	L330	Docket Behunin transcript	\$450.00	\$90.00
Hibray, Jean	7/19/2023	0.4	L330	Finish confidentiality review of Siegel transcript, email to S Rios	\$450.00	\$180.00
Hibray, Jean	7/19/2023	1	L330	Confidentiality review of Behunin transcript, email S Rios re same	\$450.00	\$450.00
Rios, Sophia M	7/19/2023	1.3	L160	Research [REDACTED]	\$710.00	\$923.00
Rios, Sophia M	7/19/2023	1.9	L300	Draft responses to discovery requests and prepare production of documents	\$710.00	\$1,349.00
Drake, Eleanor Michelle	7/19/2023	0.3	L310	emails with cocounsel re [REDACTED]	\$1,180.00	\$354.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Drake, Eleanor Michelle	7/20/2023	0.5	L120	correspondence with cocounsel re [REDACTED]	\$1,180.00	\$590.00
Hibray, Jean	7/20/2023	0.2	L320	Review new [REDACTED], submit [REDACTED]	\$450.00	\$90.00
Hibray, Jean	7/20/2023	0.2	L330	Email with S Rios re confidentiality designations	\$450.00	\$90.00
Hibray, Jean	7/20/2023	0.2	L320	Load doc to Rel, email with S Rios	\$450.00	\$90.00
Hibray, Jean	7/20/2023	0.2	L320	Review [REDACTED] from S Rios, submit prod request	\$450.00	\$90.00
Hibray, Jean	7/20/2023	0.2	L330	Draft Siegel confidential designations letter, email S Rios	\$450.00	\$90.00
Hibray, Jean	7/20/2023	0.2	L320	Review new [REDACTED] load, submit [REDACTED]	\$450.00	\$90.00
Rios, Sophia M	7/20/2023	2.5	L330	Review sender deposition transcripts for confidentiality designations; draft letters	\$710.00	\$1,775.00
Rios, Sophia M	7/20/2023	2.5	L300	Correspond with clients re [REDACTED] and review and prepare production of documents	\$710.00	\$1,775.00
Rios, Sophia M	7/20/2023	0.6	L300	Draft interrogatories	\$710.00	\$426.00
Hibray, Jean	7/21/2023	0.1	L320	Email re [REDACTED]	\$450.00	\$45.00
Hibray, Jean	7/21/2023	0.4	L330	Prepare confidentiality designations letter for Behunin, email co counsel re [REDACTED]	\$450.00	\$180.00
Hibray, Jean	7/21/2023	0.4	L320	Review prod files, e-serve same	\$450.00	\$180.00
Rios, Sophia M	7/21/2023	0.4	L300	Prepare production of documents	\$710.00	\$284.00
Rios, Sophia M	7/21/2023	0.3	L300	Correspond with clients re [REDACTED]	\$710.00	\$213.00
Hibray, Jean	7/24/2023	0.2	L300	Email to prep [REDACTED] doc prod	\$450.00	\$90.00
Hibray, Jean	7/25/2023	0.2	L320	Email re Bates for docs; coverage for service	\$450.00	\$90.00
Hibray, Jean	7/26/2023	0.1	L300	Email S rios re [REDACTED]	\$450.00	\$45.00
Hibray, Jean	7/26/2023	0.1	L300	Email A Gillette re [REDACTED]	\$450.00	\$45.00
Hibray, Jean	7/26/2023	0.2	L300	Finalize and [REDACTED] re responses	\$450.00	\$90.00
Hibray, Jean	7/26/2023	0.1	L300	Text with A Gillette	\$450.00	\$45.00
Hibray, Jean	7/26/2023	0.6	L330	Finalize and submit confidential designation letters for 3d party transcripts, track down reporter contacts for same	\$450.00	\$270.00
Hibray, Jean	7/26/2023	0.2	L320	Split up [REDACTED], submit to Relativity.	\$450.00	\$90.00
Rios, Sophia M	7/26/2023	1	L300	Correspond with clients re [REDACTED]	\$710.00	\$710.00
Hibray, Jean	7/27/2023	0.1	L300	Email Terrell Marshall re [REDACTED]	\$450.00	\$45.00
Hibray, Jean	7/31/2023	0.2	L300	Docket discovery responses	\$450.00	\$90.00
Hibray, Jean	7/31/2023	0.1	L300	Send [REDACTED] client [REDACTED]	\$450.00	\$45.00
Rios, Sophia M	7/31/2023	3.1	L340	Call with co-counsel re [REDACTED]; review [REDACTED] draft plan for [REDACTED]	\$710.00	\$2,201.00
Rios, Sophia M	7/31/2023	1	L300	Review documents produced by Defendant	\$710.00	\$710.00
Hibray, Jean	8/1/2023	0.2	L320	Emails re [REDACTED] produce	\$450.00	\$90.00
Hibray, Jean	8/1/2023	0.2	L300	Finalize and e-serve prod, verification	\$450.00	\$90.00
Hibray, Jean	8/1/2023	0.1	L140	Review emails, docket mediation	\$450.00	\$45.00
Rios, Sophia M	8/1/2023	2.2	L300	Review documents produced by Defendant	\$710.00	\$1,562.00
Rios, Sophia M	8/1/2023	2.8	L300	Review and revise interrogatories to Defendant	\$710.00	\$1,988.00
Hibray, Jean	8/2/2023	0.2	L300	Docket subpoenas	\$450.00	\$90.00
Hibray, Jean	8/2/2023	0.1	L300	Finalize and eserve next requests	\$450.00	\$45.00
Rios, Sophia M	8/2/2023	0.2	L340	schedule call with [REDACTED]	\$710.00	\$142.00
Rios, Sophia M	8/2/2023	1.5	L300	Review documents produced by Defendant	\$710.00	\$1,065.00
Hibray, Jean	8/3/2023	0.5	L300	Draft Branch exhibit A	\$450.00	\$225.00
Rios, Sophia M	8/3/2023	1	L340	call with [REDACTED]	\$710.00	\$710.00
Rios, Sophia M	8/3/2023	3.3	L300	Review documents produced by Defendant	\$710.00	\$2,343.00
Rios, Sophia M	8/3/2023	1	L300	Draft subpoena to Branch Metrics and discuss with co-counsel	\$710.00	\$710.00
Hibray, Jean	8/4/2023	0.3	L300	Call with S Rios	\$450.00	\$135.00
Hibray, Jean	8/4/2023	0.4	L300	prep subpoena form, finalize with ex A. E-serve opposing, send to First Legal	\$450.00	\$180.00
Rios, Sophia M	8/4/2023	0.1	L300	Attention to serving subpoena to Branch Metrics	\$710.00	\$71.00
Rios, Sophia M	8/4/2023	0.3	L300	Draft and send email to client re [REDACTED]	\$710.00	\$213.00
Rios, Sophia M	8/4/2023	3.2	L300	Review documents produced by Defendant	\$710.00	\$2,272.00
Rios, Sophia M	8/7/2023	1.7	L300	Prepare for and meet and confer with Defendant re 30(b)(6) notice; confer with co counsel	\$710.00	\$1,207.00
Hibray, Jean	8/7/2023	0.3	L320	Review new def prod, submit [REDACTED]	\$450.00	\$135.00
Hibray, Jean	8/7/2023	0.3	L320	Email with S Rios re [REDACTED] upload; prepare and send request [REDACTED]	\$450.00	\$135.00
Hibray, Jean	8/7/2023	0.1	L300	Call with S Rios	\$450.00	\$45.00
Drake, Eleanor Michelle	8/7/2023	0.1	L120	team meeting re case status and moving forward	\$1,180.00	\$118.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Vaughan, Zachary M	8/7/2023	0.5	L300	TC and emails with S. Rios re [REDACTED]	\$740.00	\$370.00
Vaughan, Zachary M	8/7/2023	1.2	L300	Review and analyze documents produced by Defendant	\$740.00	\$888.00
Rios, Sophia M	8/7/2023	2.5	L300	Review documents produced by Defendant	\$710.00	\$1,775.00
Vaughan, Zachary M	8/8/2023	0.6	L300	Review and analyze documents produced by Defendant	\$740.00	\$444.00
Rios, Sophia M	8/8/2023	4.9	L300	Review documents produced by Defendant	\$710.00	\$3,479.00
Rios, Sophia M	8/8/2023	1.6	L300	Review documents collected [REDACTED] prepare for production	\$710.00	\$1,136.00
Hibray, Jean	8/9/2023	0.2	L320	Email re claw back	\$450.00	\$90.00
Hibray, Jean	8/9/2023	0.4	L320	Review privilege log, compare with [REDACTED], email S Rios re same	\$450.00	\$180.00
Vaughan, Zachary M	8/9/2023	3.1	L300	Review and analyze documents produced by Defendant	\$740.00	\$2,294.00
Rios, Sophia M	8/9/2023	4.7	L300	Review documents produced by Defendant	\$710.00	\$3,337.00
Rios, Sophia M	8/9/2023	1	L300	Meet and confer with defendant re subpoena to Branch Metrics; discuss response with co-counsel	\$710.00	\$710.00
Rios, Sophia M	8/9/2023	0.8	L300	Draft outline for 30(b)(6) deposition	\$710.00	\$568.00
Hibray, Jean	8/10/2023	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Hibray, Jean	8/10/2023	0.6	L320	Update prod set, set up imaging, email with S Rios; submit prod request	\$450.00	\$270.00
Hibray, Jean	8/10/2023	0.2	L300	Set up supplemental priv log	\$450.00	\$90.00
Vaughan, Zachary M	8/10/2023	4.2	L300	Review and analyze documents produced by Defendant	\$740.00	\$3,108.00
Rios, Sophia M	8/10/2023	0.9	L300	Finalize document production and draft supplemental priv log	\$710.00	\$639.00
Rios, Sophia M	8/10/2023	0.6	L300	Draft outline for 30(b)(6) deposition	\$710.00	\$426.00
Rios, Sophia M	8/11/2023	2.7	L300	Review documents produced by Defendant	\$710.00	\$1,917.00
Rios, Sophia M	8/11/2023	0.6	L120	Call with EMD and ZV re [REDACTED]	\$710.00	\$426.00
Hibray, Jean	8/11/2023	0.5	L300	Finalize suppl priv log, production; eserve	\$450.00	\$225.00
Hibray, Jean	8/11/2023	0.1	L300	Docket mediation	\$450.00	\$45.00
Drake, Eleanor Michelle	8/11/2023	0.6	L120	call with S Rios and Z Vaughan re [REDACTED]	\$1,180.00	\$708.00
Vaughan, Zachary M	8/11/2023	1.7	L300	Review and analyze documents produced by Defendant	\$740.00	\$1,258.00
Vaughan, Zachary M	8/11/2023	0.7	L120	TC and emails with M. Drake and S. Rios re [REDACTED]	\$740.00	\$518.00
Rios, Sophia M	8/11/2023	1.3	L300	Draft email to OC re schedule extension; discuss with co-counsel; send to Defendant	\$710.00	\$923.00
Hibray, Jean	8/14/2023	0.3	L320	Review new def prods, submit with instructions	\$450.00	\$135.00
Hibray, Jean	8/14/2023	0.2	L320	Emails re passwords	\$450.00	\$90.00
Rios, Sophia M	8/14/2023	4.2	L300	Review documents produced by Defendant	\$710.00	\$2,982.00
Vaughan, Zachary M	8/14/2023	4.3	L300	Review and analyze documents produced by Defendant	\$740.00	\$3,182.00
Hibray, Jean	8/15/2023	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Rios, Sophia M	8/15/2023	2.4	L300	Review documents produced by Defendant	\$710.00	\$1,704.00
Rios, Sophia M	8/15/2023	0.4	L300	Meet and confer with Branch Metrics attorney re subpoena	\$710.00	\$284.00
Rios, Sophia M	8/15/2023	0.5	L300	Draft joint motion for case extension	\$710.00	\$355.00
Vaughan, Zachary M	8/15/2023	3.6	L300	Review and analyze documents produced by Defendant	\$740.00	\$2,664.00
Vaughan, Zachary M	8/15/2023	0.7	L300	TC with S. Rios and counsel for Branch re third-party subpoena; TC with S. Rios re [REDACTED]	\$740.00	\$518.00
Drake, Eleanor Michelle	8/16/2023	0.2	L310	review correspondence from oc, email team with potential response	\$1,180.00	\$236.00
Rios, Sophia M	8/16/2023	0.3	L300	Draft outline for 30(b)(6) deposition	\$710.00	\$213.00
Rios, Sophia M	8/16/2023	2.7	L300	Review documents produced by Defendant	\$710.00	\$1,917.00
Rios, Sophia M	8/16/2023	0.6	L300	Review email from OC re case extension and respond; revise draft joint motion	\$710.00	\$426.00
Vaughan, Zachary M	8/16/2023	0.4	L300	Review response from Defendant re request for extension of time; emails with case team re [REDACTED]	\$740.00	\$296.00
Vaughan, Zachary M	8/16/2023	1.3	L300	Review and analyze documents produced by Defendant	\$740.00	\$962.00
Gionnette, Julie	8/17/2023	0.1	L140	download and review docket entry (ECF 81)	\$285.00	\$28.50
Rios, Sophia M	8/17/2023	0.2	L300	Prepare joint motion re case extension for filing	\$710.00	\$142.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Vaughan, Zachary M	8/17/2023	2.4	L300	Review and analyze documents produced by Defendant	\$740.00	\$1,776.00
Vaughan, Zachary M	8/17/2023	0.2	L300	Emails with opposing counsel re stipulated motion for extension of discovery deadlines	\$740.00	\$148.00
Rios, Sophia M	8/18/2023	4.1	L300	Draft outline for 30(b)(6) deposition	\$710.00	\$2,911.00
Vaughan, Zachary M	8/18/2023	1.3	L300	Review and analyze documents produced by Defendant	\$740.00	\$962.00
Drake, Eleanor Michelle	8/21/2023	0.3	L120	call with S Rios re [REDACTED]	\$1,180.00	\$354.00
Rios, Sophia M	8/21/2023	1	L300	Draft outline for 30(b)(6) deposition; email with OC re scheduling; call with EMD re [REDACTED]	\$710.00	\$710.00
Hibray, Jean	8/21/2023	0.3	L330	Emails re scheduling 30b6	\$450.00	\$135.00
Vaughan, Zachary M	8/21/2023	0.3	L250	Emails with court clerk and opposing counsel re stipulated motion to extend deadlines	\$740.00	\$222.00
Vaughan, Zachary M	8/21/2023	0.3	L330	Emails with S. Rios and opposing counsel re 30(b)(6) deposition scheduling issues	\$740.00	\$222.00
Gionnette, Julie	8/21/2023	0.3	L140	download and review docket entry (ECF 82) and rescheduling order (ECF 83); update all calendar deadlines	\$285.00	\$85.50
Rios, Sophia M	8/21/2023	0.3	L300	Draft and send email to clients re [REDACTED]	\$710.00	\$213.00
Rios, Sophia M	8/21/2023	2.9	L300	Review documents produced by Defendant	\$710.00	\$2,059.00
Rios, Sophia M	8/22/2023	2.3	L300	Review documents produced by Defendant	\$710.00	\$1,633.00
Rios, Sophia M	8/22/2023	0.3	L120	Draft [REDACTED]	\$710.00	\$213.00
Rios, Sophia M	8/23/2023	0.5	L300	Meet and confer with Branch Metrics attorney re subpoena	\$710.00	\$355.00
Rios, Sophia M	8/23/2023	0.5	L120	Draft [REDACTED]	\$710.00	\$355.00
Rios, Sophia M	8/23/2023	3.4	L300	Review documents produced by Defendant	\$710.00	\$2,414.00
Vaughan, Zachary M	8/24/2023	0.3	L330	Emails with S. Rios and opposing counsel re 30(b)(6) deposition scheduling issues	\$740.00	\$222.00
Rios, Sophia M	8/24/2023	1	L300	Review documents produced by Defendant	\$710.00	\$710.00
Vaughan, Zachary M	8/25/2023	0.2	L330	Emails with S. Rios and opposing counsel re 30(b)(6) deposition scheduling issues	\$740.00	\$148.00
Rios, Sophia M	8/25/2023	0.3	L300	Call clients re [REDACTED]	\$710.00	\$213.00
Rios, Sophia M	8/25/2023	3.1	L300	Review documents produced by Defendant	\$710.00	\$2,201.00
Vaughan, Zachary M	8/28/2023	0.3	L300	Emails with S. Rios and J. Murray re [REDACTED]	\$740.00	\$222.00
Vaughan, Zachary M	8/28/2023	1.8	L300	Review and analyze documents produced by Defendant	\$740.00	\$1,332.00
Rios, Sophia M	8/28/2023	0.6	L120	Draft [REDACTED] and distribute to team	\$710.00	\$426.00
Rios, Sophia M	8/28/2023	4.7	L300	Review documents produced by Defendant	\$710.00	\$3,337.00
Vaughan, Zachary M	8/29/2023	4.7	L300	Review and analyze documents produced by Defendant; review and analyze subpoena to Branch and notes from recent meet-and-confer calls; review and analyze [REDACTED]	\$740.00	\$3,478.00
Hibray, Jean	8/29/2023	0.3	L320	Review new prods, submit to Ricoh	\$450.00	\$135.00
Rios, Sophia M	8/29/2023	3.7	L300	Review documents produced by Defendant	\$710.00	\$2,627.00
Vaughan, Zachary M	8/30/2023	4.7	L300	Review and analyze documents produced by Defendant; TC and emails with S. Rios re [REDACTED]	\$740.00	\$3,478.00
Vaughan, Zachary M	8/30/2023	0.7	L300	Prepare discovery correspondence to Robinhood	\$740.00	\$518.00
Vaughan, Zachary M	8/30/2023	0.8	L300	TC with S. Rios re Robinhood declarations; emails with case team re [REDACTED]	\$740.00	\$592.00
Vaughan, Zachary M	8/30/2023	1.3	L300	Emails with counsel for Branch re subpoena productions; emails with case team re [REDACTED]; review and analyze produced documents; review and analyze [REDACTED]	\$740.00	\$962.00
Hibray, Jean	8/30/2023	0.2	L320	Review Branch production, split, submit [REDACTED]	\$450.00	\$90.00
Rios, Sophia M	8/30/2023	2.3	L300	Review documents produced by Defendant	\$710.00	\$1,633.00
Rios, Sophia M	8/30/2023	1	L300	Review declarations produced by defendant and discuss response	\$710.00	\$710.00
Rios, Sophia M	8/30/2023	2.1	L300	Draft letter to Def re production deficiencies	\$710.00	\$1,491.00
Drake, Eleanor Michelle	8/31/2023	1	L120	meet with team re next steps	\$1,180.00	\$1,180.00
Vaughan, Zachary M	8/31/2023	1	L300	TC with M. Drake, S. Rios, B. Terrell, and J. Murray re [REDACTED]	\$740.00	\$740.00
Vaughan, Zachary M	8/31/2023	3.5	L300	Review and analyze documents produced by Defendant	\$740.00	\$2,590.00
Hibray, Jean	8/31/2023	0.4	L300	Draft DWT subpoena form and exhibit requests	\$450.00	\$180.00
Hibray, Jean	8/31/2023	0.1	L330	Emails re depositions	\$450.00	\$45.00

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Rios, Sophia M	8/31/2023	3.6	L300	Draft discovery requests to defendant; draft subpoena to DWT; draft amended 30(b)(6) notice	\$710.00	\$2,556.00
Rios, Sophia M	8/31/2023	1	L120	██████████ call with co-counsel re ██████████	\$710.00	\$710.00
Vaughan, Zachary M	9/1/2023	0.6	L300	Review and analyze draft discovery requests; emails with case team re ██████████	\$740.00	\$444.00
Vaughan, Zachary M	9/1/2023	0.7	L300	Review and analyze interrogatory responses, documents referenced therein, and related documents; emails with case team re ██████████	\$740.00	\$518.00
Vaughan, Zachary M	9/1/2023	2.1	L300	Review and revise draft letters to Robinhood; emails with case team re ██████████	\$740.00	\$1,554.00
Rios, Sophia M	9/1/2023	0.5	L300	Discuss letter to def ██████████ with co-counsel; review and revise draft letter	\$710.00	\$355.00
Rios, Sophia M	9/5/2023	2.4	L300	Email OC re deposition scheduling; review email from OC re discovery; draft response; review data	\$710.00	\$1,704.00
Rios, Sophia M	9/5/2023	0.4	L120	Draft and send ██████████ to co-counsel	\$710.00	\$284.00
Vaughan, Zachary M	9/5/2023	3.2	L300	Review and analyze discovery requests and R&Os; review and analyze ██████████ ██████████; prepare discovery correspondence to Robinhood	\$740.00	\$2,368.00
Vaughan, Zachary M	9/5/2023	1.7	L300	Review and analyze ██████████ transcript	\$740.00	\$1,258.00
Vaughan, Zachary M	9/5/2023	0.3	L300	Emails with opposing counsel re discovery issues	\$740.00	\$222.00
Rios, Sophia M	9/6/2023	3.1	L300	draft outline for 30(b)(6) deposition	\$710.00	\$2,201.00
Vaughan, Zachary M	9/6/2023	2.9	L300	Emails with counsel for Branch re subpoena productions; review and analyze data produced by Branch; emails with case team re ██████████	\$740.00	\$2,146.00
Vaughan, Zachary M	9/6/2023	1.7	L300	Review, revise, and finalize discovery correspondence; emails with S. Rios and J. Murray re ██████████	\$740.00	\$1,258.00
Vaughan, Zachary M	9/6/2023	1.6	L300	Emails and TCs with S. Rios and J. Murray re ██████████	\$740.00	\$1,184.00
Rios, Sophia M	9/7/2023	1.1	L300	Call ██████████; send summary to team	\$710.00	\$781.00
Vaughan, Zachary M	9/7/2023	3.2	L300	Review and analyze ██████████ transcript	\$740.00	\$2,368.00
Vaughan, Zachary M	9/7/2023	3.1	L300	Review and analyze data produced by Branch; TC with S. Rios re ██████████	\$740.00	\$2,294.00
Vaughan, Zachary M	9/7/2023	0.5	L340	Review and analyze materials from ██████████	\$740.00	\$370.00
Drake, Eleanor Michelle	9/8/2023	1	L310	attend meet and confer re: outstanding data, subpoenas to oc, and newly issued discovery requests	\$1,180.00	\$1,180.00
Rios, Sophia M	9/8/2023	1	L340	Discuss ██████████ with co-counsel; review draft declaration	\$710.00	\$710.00
Rios, Sophia M	9/8/2023	2.2	L300	Prepare for meet and confer re discovery requests; meet and confer	\$710.00	\$1,562.00
Rios, Sophia M	9/8/2023	0.4	L160	Rule 408 discussion with opposing counsel	\$710.00	\$284.00
Vaughan, Zachary M	9/8/2023	0.7	L340	Emails with S. Rios and J. Murray re ██████████; review ██████████	\$740.00	\$518.00
Hibray, Jean	9/8/2023	0.2	L330	Emails re 30b6 depos	\$450.00	\$90.00
Hibray, Jean	9/8/2023	0.2	L300	Docket discovery deadlines for recent services	\$450.00	\$90.00
Hibray, Jean	9/8/2023	0.3	L320	Emails re Branch productions	\$450.00	\$135.00
Hibray, Jean	9/8/2023	0.2	L320	Review T Mobile production, submit to Ricoh	\$450.00	\$90.00
Vaughan, Zachary M	9/11/2023	0.7	L340	Review ██████████	\$740.00	\$518.00
Rios, Sophia M	9/11/2023	1.4	L300	draft outline for 30(b)(6) deposition	\$710.00	\$994.00
Vaughan, Zachary M	9/12/2023	0.8	L340	Review ██████████	\$740.00	\$592.00
Vaughan, Zachary M	9/12/2023	3.7	L300	TC with S. Rios re discovery issues; review and analyze data excerpts and other documents produced by Defendant	\$740.00	\$2,738.00
Rios, Sophia M	9/12/2023	1.5	L300	draft outline for 30(b)(6) deposition	\$710.00	\$1,065.00
Vaughan, Zachary M	9/13/2023	0.7	L300	Review and analyze data excerpts and other documents produced by Defendant	\$740.00	\$518.00
Vaughan, Zachary M	9/13/2023	2.6	L300	Review and analyze ██████████ transcript and exhibits	\$740.00	\$1,924.00
Rios, Sophia M	9/13/2023	3.3	L300	draft outline for 30(b)(6) deposition	\$710.00	\$2,343.00
Vaughan, Zachary M	9/14/2023	3.6	L300	Prepare for meet-and-confer call with counsel for Branch; attend meet-and-confer call; TC with co-counsel re ██████████; review and revise discovery letter to Defendant	\$740.00	\$2,664.00

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Vaughan, Zachary M	9/14/2023	0.4	L300	Prepare for meet and confer re discovery responses; call with co-counsel re same; attend meet and confer	\$740.00	\$296.00
Hibray, Jean	9/14/2023	0.1	L320	Submit native [REDACTED]	\$450.00	\$45.00
Rios, Sophia M	9/14/2023	4.8	L300	draft outline for 30(b)(6) deposition	\$710.00	\$3,408.00
Rios, Sophia M	9/14/2023	0.8	L300	Meet and confer with Branch re subpoena	\$710.00	\$568.00
Vaughan, Zachary M	9/15/2023	3.8	L300	Review and analyze [REDACTED] transcript and exhibits; prepare memorandum re same	\$740.00	\$2,812.00
Hibray, Jean	9/15/2023	0.3	L330	Email clients re [REDACTED] update calendar as well	\$450.00	\$135.00
Rios, Sophia M	9/15/2023	5	L300	draft outline for 30(b)(6) deposition	\$710.00	\$3,550.00
Vaughan, Zachary M	9/18/2023	0.3	L340	Emails with case team re [REDACTED]	\$740.00	\$222.00
Vaughan, Zachary M	9/18/2023	0.3	L300	Emails with S. Rios and opposing counsel re discovery issues	\$740.00	\$222.00
Vaughan, Zachary M	9/18/2023	0.8	L300	Review and analyze Defendant responses to discovery requests re customer declarations; emails with M. Drake, S. Rios, B. Terrell, and J. Murray re [REDACTED]; research re [REDACTED]	\$740.00	\$592.00
Rios, Sophia M	9/18/2023	2.5	L300	draft outline for 30(b)(6) deposition	\$710.00	\$1,775.00
Hibray, Jean	9/19/2023	0.1	L210	Email re invoice	\$450.00	\$45.00
Vaughan, Zachary M	9/19/2023	1.7	L300	Review and analyze Branch documentation to develop [REDACTED]	\$740.00	\$1,258.00
Vaughan, Zachary M	9/19/2023	3.4	L300	Prepare for and attend meet-and-confer call with opposing counsel; TCs with S. Rios re [REDACTED]; prepare follow-up correspondence	\$740.00	\$2,516.00
Rios, Sophia M	9/19/2023	0.4	L300	draft outline for 30(b)(6) deposition	\$710.00	\$284.00
Rios, Sophia M	9/19/2023	3	L300	Review documents produced by Robinhood; identify issues for followup	\$710.00	\$2,130.00
Rios, Sophia M	9/19/2023	0.6	L300	Review draft email re Branch; review data	\$710.00	\$426.00
Hibray, Jean	9/20/2023	0.2	L320	Review new def prod, submit to Relativity	\$450.00	\$90.00
Hibray, Jean	9/20/2023	0.2	L330	Email with S Rios re logistics	\$450.00	\$90.00
Hibray, Jean	9/20/2023	0.2	L330	Email opposing re depo logistics	\$450.00	\$90.00
Vaughan, Zachary M	9/20/2023	1.7	L300	Prepare M&C follow-up correspondence; emails with S. Rios and J. Murray re [REDACTED]	\$740.00	\$1,258.00
Vaughan, Zachary M	9/20/2023	0.7	L300	Review and analyze Branch documentation to develop [REDACTED]	\$740.00	\$518.00
Vaughan, Zachary M	9/20/2023	0.4	L300	Review discovery correspondence from Defendant	\$740.00	\$296.00
Vaughan, Zachary M	9/20/2023	0.4	L300	Review and analyze Defendant's amended initial disclosures and R&Os to 30(b)(6) notice; emails with case team re same	\$740.00	\$296.00
Rios, Sophia M	9/20/2023	6	L300	draft outline for 30(b)(6) deposition	\$710.00	\$4,260.00
Rios, Sophia M	9/20/2023	1.4	L300	Draft and send email re declarations discovery to defense counsel; review letter and set meet and confer time.	\$710.00	\$994.00
Hibray, Jean	9/21/2023	1	L330	Prepare tablet for use at depo, prepare instructions, FedEx packets, travel to/from drop off of same	\$450.00	\$450.00
Hibray, Jean	9/21/2023	0.2	L330	Emails with S Rios re exhibit prep	\$450.00	\$90.00
Hibray, Jean	9/21/2023	0.8	L330	Pull native files for exhibit use, troubleshoot how to open on tablet, email instructions to S Rios	\$450.00	\$360.00
Hibray, Jean	9/21/2023	0.5	L330	Review outline for additional exhibits, pull and upload in AgileLaw	\$450.00	\$225.00
Vaughan, Zachary M	9/21/2023	1.3	L300	Review, revise, and send M&C follow-up correspondence; emails with S. Rios and J. Murray re [REDACTED]	\$740.00	\$962.00
Vaughan, Zachary M	9/21/2023	1.7	L340	TC with S. Rios, J. Murray, and [REDACTED]	\$740.00	\$1,258.00
Rios, Sophia M	9/21/2023	0.6	L300	Review email from defense counsel on documents requests; draft and send response	\$710.00	\$426.00
Rios, Sophia M	9/21/2023	1.5	L340	Call with [REDACTED] re [REDACTED]	\$710.00	\$1,065.00
Hibray, Jean	9/22/2023	0.2	L320	Review new def prod, submit to Relativity	\$450.00	\$90.00
Vaughan, Zachary M	9/22/2023	2.3	L300	Review and analyze Branch documentation to develop [REDACTED]; [REDACTED] prepare list [REDACTED]; emails with Branch counsel re same	\$740.00	\$1,702.00
Vaughan, Zachary M	9/22/2023	2.4	L120	Research re [REDACTED]; emails with M. Drake, S. Rios, B. Terrell, and J. Murray re same	\$740.00	\$1,776.00
Vaughan, Zachary M	9/22/2023	1.8	L300	Prepare for and attend meet-and-confer call with opposing counsel; TC with S. Rios and J. Murray re same	\$740.00	\$1,332.00
Vaughan, Zachary M	9/22/2023	0.4	L160	Prepare initial demand letter	\$740.00	\$296.00
Rios, Sophia M	9/22/2023	3.8	L300	draft outline for 30(b)(6) deposition	\$710.00	\$2,698.00

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Rios, Sophia M	9/22/2023	2	L300	Prepare for meet and confer re discovery responses; attend meet and confer	\$710.00	\$1,420.00
Rios, Sophia M	9/25/2023	3.1	L300	draft outline for 30(b)(6) deposition	\$710.00	\$2,201.00
Hibray, Jean	9/25/2023	0.3	L320	Review re-prod for depo docs, pull and load to AgileLaw accordingly.	\$450.00	\$135.00
Vaughan, Zachary M	9/25/2023	3.8	L160	Review and analyze order denying MTD; research re [REDACTED]; prepare initial demand letter	\$740.00	\$2,812.00
Vaughan, Zachary M	9/25/2023	0.9	L340	Review and analyze draft expert report	\$740.00	\$666.00
Rios, Sophia M	9/26/2023	8.1	L300	draft outline for 30(b)(6) deposition part I	\$710.00	\$5,751.00
Hibray, Jean	9/26/2023	0.4	L330	Emails re confirming depo	\$450.00	\$180.00
Hibray, Jean	9/26/2023	0.2	L320	Review new def prod, submit to Ricoh	\$450.00	\$90.00
Hibray, Jean	9/26/2023	0.3	L330	Emails with S Rios re exhibits	\$450.00	\$135.00
Hibray, Jean	9/26/2023	0.1	L330	Pull additional copy of exhibit into AgileLaw	\$450.00	\$45.00
Vaughan, Zachary M	9/26/2023	3.7	L300	Review and analyze draft 30(b)(6) deposition outline; TC with S. Rios re [REDACTED]; review and analyze data produced by Robinhood	\$740.00	\$2,738.00
Vaughan, Zachary M	9/26/2023	1.2	L160	Research re [REDACTED]; TC and emails with S. Rios re [REDACTED]; prepare initial demand letter	\$740.00	\$888.00
Vaughan, Zachary M	9/26/2023	1.1	L340	Review and analyze draft expert report	\$740.00	\$814.00
Rios, Sophia M	9/27/2023	9.8	L300	Take 30(b)(6) deposition part I	\$710.00	\$6,958.00
Hibray, Jean	9/27/2023	0.1	L330	Email S Rios re today's depo	\$450.00	\$45.00
Vaughan, Zachary M	9/27/2023	7.6	L330	Attend 30(b)(6) deposition (part 1 of 2); emails and TCs with S. Rios, J. Murray, J. Nuss, [REDACTED] re [REDACTED]	\$740.00	\$5,624.00
Rios, Sophia M	9/28/2023	3.3	L300	draft outline for 30(b)(6) deposition part II	\$710.00	\$2,343.00
Hibray, Jean	9/28/2023	0.3	L330	Emails re confirming depo	\$450.00	\$135.00
Hibray, Jean	9/28/2023	0.1	L330	Email with S Rios re videos	\$450.00	\$45.00
Vaughan, Zachary M	9/28/2023	0.4	L330	Review and analyze rough transcript of 30(b)(6) deposition	\$740.00	\$296.00
Vaughan, Zachary M	9/28/2023	0.4	L300	Emails with counsel for Branch re subpoena productions; emails with counsel for Defendant re outstanding discovery issues	\$740.00	\$296.00
Rios, Sophia M	9/29/2023	9.4	L300	Take 30(b)(6) deposition part II	\$710.00	\$6,674.00
Hibray, Jean	9/29/2023	0.1	L320	Emails re clawback	\$450.00	\$45.00
Vaughan, Zachary M	9/29/2023	7.3	L330	Attend 30(b)(6) deposition (part 2 of 2); emails and TCs with S. Rios and J. Murray re [REDACTED]	\$740.00	\$5,402.00
Vaughan, Zachary M	10/2/2023	0.4	L330	Review rough transcripts from 30(b)(6) deposition	\$740.00	\$296.00
Vaughan, Zachary M	10/3/2023	0.4	L300	Emails with M. Drake, S. Rios, B. Terrell, and J. Murray re [REDACTED]	\$740.00	\$296.00
Vaughan, Zachary M	10/3/2023	0.2	L300	Emails with counsel for Branch re subpoena productions	\$740.00	\$148.00
Rios, Sophia M	10/3/2023	0.9	L300	draft and send email to opposing counsel re discovery issues	\$710.00	\$639.00
Rios, Sophia M	10/3/2023	0.7	L330	Correspond with Plaintiffs re [REDACTED]	\$710.00	\$497.00
Hibray, Jean	10/3/2023	0.3	L320	Email with co-counsel re documents, review and submit [REDACTED]	\$450.00	\$135.00
Hibray, Jean	10/4/2023	0.2	L320	Review overlay, submit [REDACTED]	\$450.00	\$90.00
Rios, Sophia M	10/4/2023	0.2	L300	draft and send email to opposing counsel re discovery issues	\$710.00	\$142.00
Rios, Sophia M	10/4/2023	1.8	L340	review and revise draft declaration	\$710.00	\$1,278.00
Vaughan, Zachary M	10/4/2023	2.7	L160	Review and analyze order denying MTD; research re [REDACTED]; prepare initial demand letter; emails with S. Rios and J. Murray re same	\$740.00	\$1,998.00
Hibray, Jean	10/4/2023	0.1	L330	Email reporter re videos requested	\$450.00	\$45.00
Hibray, Jean	10/4/2023	0.7	L320	Review def's redaction log, [REDACTED] Email S Rios re same.	\$450.00	\$315.00
Hibray, Jean	10/5/2023	0.4	L320	Review third party docs for production, update; submit prod request to Ricoh.	\$450.00	\$180.00
Drake, Eleanor Michelle	10/5/2023	0.1	L120	team meeting to discuss case status	\$1,180.00	\$118.00
Rios, Sophia M	10/5/2023	1	L340	review and revise draft declaration	\$710.00	\$710.00
Rios, Sophia M	10/5/2023	1.1	L300	draft and send email to opposing counsel re requested supp responses to 2d set of rogs	\$710.00	\$781.00
Rios, Sophia M	10/5/2023	0.4	L160	review and revise draft demand letter	\$710.00	\$284.00
Hibray, Jean	10/6/2023	0.2	L320	E-serve production of cell provider subpoena responses.	\$450.00	\$90.00
Hibray, Jean	10/7/2023	0.2	L320	Review new def prod, submit [REDACTED]	\$450.00	\$90.00
Vaughan, Zachary M	10/9/2023	1	L120	TC with M. Drake, S. Rios, B. Terrell, and J. Murray re [REDACTED]	\$740.00	\$740.00

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Rios, Sophia M	10/9/2023	2.3	L330	prepare for Plaintiffs' depositions	\$710.00	\$1,633.00
Rios, Sophia M	10/9/2023	1.4	L120	confer with co-counsel re [REDACTED]	\$710.00	\$994.00
Drake, Eleanor Michelle	10/9/2023	0.6	L120	call re next steps in [REDACTED]	\$1,180.00	\$708.00
Vaughan, Zachary M	10/10/2023	0.6	L300	Review and analyze data produced by Branch; emails with S. Rios and J. Murray re [REDACTED]	\$740.00	\$444.00
Rios, Sophia M	10/10/2023	0.7	L330	prepare for Plaintiffs' depositions	\$710.00	\$497.00
Vaughan, Zachary M	10/11/2023	1.1	L300	Prepare response to Robinhood re Branch data	\$740.00	\$814.00
Vaughan, Zachary M	10/11/2023	1.9	L300	Review and analyze data productions from Robinhood and Branch	\$740.00	\$1,406.00
Vaughan, Zachary M	10/11/2023	0.5	L160	Prepare mediation statement; TC with S. Rios re [REDACTED]	\$740.00	\$370.00
Hibray, Jean	10/11/2023	0.2	L330	Docket Deng transcript files	\$450.00	\$90.00
Hibray, Jean	10/11/2023	0.2	L330	Docket Ali transcript files	\$450.00	\$90.00
Hibray, Jean	10/11/2023	0.1	L330	Email co counsel re transcripts	\$450.00	\$45.00
Hibray, Jean	10/11/2023	0.1	L300	Email J Nuss re re-prod	\$450.00	\$45.00
Rios, Sophia M	10/11/2023	2.1	L300	confer with opposing counsel re plaintiffs discovery requests	\$710.00	\$1,491.00
Rios, Sophia M	10/11/2023	2.5	L330	prepare for Plaintiffs' depositions	\$710.00	\$1,775.00
Rios, Sophia M	10/11/2023	0.9	L160	Call with co counsel re [REDACTED]	\$710.00	\$639.00
Vaughan, Zachary M	10/12/2023	2.2	L300	Prepare response to Robinhood re Branch data; emails and TCs with S. Rios re [REDACTED]	\$740.00	\$1,628.00
Vaughan, Zachary M	10/12/2023	2.3	L300	Review and analyze data productions from Robinhood and Branch	\$740.00	\$1,702.00
Vaughan, Zachary M	10/12/2023	0.3	L300	Review correspondence to/from Robinhood re interrogatory responses	\$740.00	\$222.00
Rios, Sophia M	10/12/2023	1	L300	Consider additional data from Branch and response	\$710.00	\$710.00
Rios, Sophia M	10/12/2023	0.3	L300	confer with opposing counsel re plaintiffs discovery requests	\$710.00	\$213.00
Vaughan, Zachary M	10/13/2023	0.6	L160	Prepare mediation statement	\$740.00	\$444.00
Hibray, Jean	10/13/2023	0.1	L330	Set up exhibit access for Lexitas	\$450.00	\$45.00
Hibray, Jean	10/13/2023	0.3	L330	Docket additional transcript files, email to co counsel	\$450.00	\$135.00
Rios, Sophia M	10/13/2023	0.7	L160	Draft mediation brief	\$710.00	\$497.00
Rios, Sophia M	10/13/2023	1.2	L330	prepare for Plaintiffs' depositions	\$710.00	\$852.00
Vaughan, Zachary M	10/16/2023	0.6	L160	TC with mediator and opposing counsel; emails with case team re same	\$740.00	\$444.00
Vaughan, Zachary M	10/16/2023	4.4	L160	Prepare mediation statement; TC with S. Rios and J. Murray re [REDACTED]; emails with S. Rios re same	\$740.00	\$3,256.00
Rios, Sophia M	10/16/2023	1.4	L160	Draft mediation brief	\$710.00	\$994.00
Rios, Sophia M	10/16/2023	2.5	L330	prepare for Plaintiffs' depositions	\$710.00	\$1,775.00
Rios, Sophia M	10/16/2023	0.6	L340	draft [REDACTED]	\$710.00	\$426.00
Rios, Sophia M	10/16/2023	0.2	L300	confer with opposing counsel re plaintiffs discovery requests	\$710.00	\$142.00
Vaughan, Zachary M	10/17/2023	2.3	L160	Prepare mediation statement; TC with S. Rios and J. Murray re same	\$740.00	\$1,702.00
Vaughan, Zachary M	10/17/2023	0.2	L300	Review correspondence from Defendant re supplementation of interrogatory responses	\$740.00	\$148.00
Hibray, Jean	10/17/2023	0.4	L300	Gather additional 3d party docs, submit to Relativity	\$450.00	\$180.00
Hibray, Jean	10/17/2023	0.4	L320	Prepare production request, emails re same	\$450.00	\$180.00
Rios, Sophia M	10/17/2023	1.8	L330	prepare for Plaintiffs' depositions	\$710.00	\$1,278.00
Rios, Sophia M	10/17/2023	1.2	L160	Draft mediation brief	\$710.00	\$852.00
Vaughan, Zachary M	10/18/2023	0.2	L300	Review correspondence from Defendant re discovery issues	\$740.00	\$148.00
Hibray, Jean	10/18/2023	0.2	L320	Serve additional 3d party docs on opposing	\$450.00	\$90.00
Hibray, Jean	10/18/2023	0.1	L160	Docket mediation location	\$450.00	\$45.00
Rios, Sophia M	10/18/2023	3.8	L160	Draft mediation brief	\$710.00	\$2,698.00
Rios, Sophia M	10/18/2023	2	L330	prepare for Plaintiffs' depositions	\$710.00	\$1,420.00
Rios, Sophia M	10/19/2023	4	L160	Draft mediation brief	\$710.00	\$2,840.00
Rios, Sophia M	10/19/2023	2	L330	Observe Moore deposition	\$710.00	\$1,420.00
Vaughan, Zachary M	10/20/2023	0.3	L300	Review memorandum re [REDACTED] emails with case team re same	\$740.00	\$222.00
Vaughan, Zachary M	10/20/2023	1.7	L120	Research re [REDACTED]; emails with case team re same	\$740.00	\$1,258.00
Rios, Sophia M	10/20/2023	2	L330	Observe Gillette deposition	\$710.00	\$1,420.00

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empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Rios, Sophia M	10/20/2023	0.3	L330	Discuss [REDACTED] with co-counsel and next setps	\$710.00	\$213.00
Drake, Eleanor Michelle	10/20/2023	1.4	L120	review and respond to emails and memo from J. Murray re [REDACTED]	\$1,180.00	\$1,652.00
Rios, Sophia M	10/21/2023	0.7	L160	Draft mediation brief	\$710.00	\$497.00
Rios, Sophia M	10/23/2023	1	L160	Review and revise mediation brief	\$710.00	\$710.00
Rios, Sophia M	10/23/2023	2.5	L340	Review and revise draft [REDACTED]	\$710.00	\$1,775.00
Rios, Sophia M	10/23/2023	1.5	L300	confer with opposing counsel re plaintiffs discovery requests	\$710.00	\$1,065.00
Vaughan, Zachary M	10/23/2023	0.3	L300	Emails with case team re [REDACTED]	\$740.00	\$222.00
Vaughan, Zachary M	10/23/2023	0.7	L340	Review and revise [REDACTED]	\$740.00	\$518.00
Hibray, Jean	10/23/2023	1	L330	Review 30b6 transcripts [REDACTED], prep designation letter	\$450.00	\$450.00
Hibray, Jean	10/23/2023	0.5	L160	Proof mediation statement, compile exhibits	\$450.00	\$225.00
Hibray, Jean	10/23/2023	0.2	L160	Finalize and submit mediaiton statement and exhibits	\$450.00	\$90.00
Rios, Sophia M	10/24/2023	1.1	L160	Review and analyze defendant's mediation brief	\$710.00	\$781.00
Rios, Sophia M	10/24/2023	0.5	L300	Review subpoena responses from third parties and draft additional request	\$710.00	\$355.00
Hibray, Jean	10/24/2023	0.1	L300	Finalize and submit Deng confidential designation letter	\$450.00	\$45.00
Rios, Sophia M	10/25/2023	1.7	L340	Review and revise [REDACTED]	\$710.00	\$1,207.00
Rios, Sophia M	10/25/2023	1	L160	call with co-counsel re [REDACTED]	\$710.00	\$710.00
Vaughan, Zachary M	10/25/2023	1.2	L120	TC with M. Drake, S. Rios, and J. Murray re [REDACTED]	\$740.00	\$888.00
Vaughan, Zachary M	10/25/2023	1	L340	TC with S. Rios, J. Murray, J. Nuss, and [REDACTED]	\$740.00	\$740.00
Drake, Eleanor Michelle	10/25/2023	1	L160	call with cocounsel re [REDACTED]	\$1,180.00	\$1,180.00
Rios, Sophia M	10/26/2023	8	L340	Review and revise [REDACTED]	\$710.00	\$5,680.00
Rios, Sophia M	10/27/2023	2.1	L160	Plan travel for mediation; prepare for mediation	\$710.00	\$1,491.00
Rios, Sophia M	10/27/2023	0.2	L300	confer with opposing counsel re plaintiffs deposition scheduling	\$710.00	\$142.00
Rios, Sophia M	10/27/2023	6.6	L340	Review and revise draft [REDACTED]	\$710.00	\$4,686.00
Rios, Sophia M	10/29/2023	2.5	L160	Travel to LA for mediation	\$710.00	\$1,775.00
Vaughan, Zachary M	10/30/2023	5.9	L160	Prepare for and attend mediation	\$740.00	\$4,366.00
Hibray, Jean	10/30/2023	0.1	L340	Docket service copy of expert report	\$450.00	\$45.00
Rios, Sophia M	10/30/2023	6.3	L160	attend mediation	\$710.00	\$4,473.00
Rios, Sophia M	10/30/2023	2.5	L160	travel home from mediation	\$710.00	\$1,775.00
Drake, Eleanor Michelle	10/30/2023	6	L160	attend mediation	\$1,180.00	\$7,080.00
Gionnette, Julie	10/31/2023	0.2	L140	review calendar deadlines and last order extending deadlines; update calendar deadlines as needed	\$285.00	\$57.00
Hibray, Jean	10/31/2023	0.6	L330	Draft 30b1 NODs, subpoena form for witnesses, check [REDACTED]	\$450.00	\$270.00
Rios, Sophia M	10/31/2023	2.1	L120	Draft [REDACTED] distribute to co-counsel	\$710.00	\$1,491.00
Hibray, Jean	11/1/2023	0.2	L330	Research [REDACTED] for S Rios	\$450.00	\$90.00
Vaughan, Zachary M	11/2/2023	0.7	L300	Prepare for and attend meet-and-confer call with opposing counsel; emails and TC with S. Rios re same	\$740.00	\$518.00
Hibray, Jean	11/2/2023	0.4	L330	Emails re transcript files; docket upon receipt	\$450.00	\$180.00
Hibray, Jean	11/2/2023	2.3	L330	Review Moore transcript for errata & Confidential designations	\$450.00	\$1,035.00
Rios, Sophia M	11/2/2023	1	L300	confer with opposing counsel re plaintiffs request for 30B6 and D's request for retainers; draft and send summary to co-counsel	\$710.00	\$710.00
Rios, Sophia M	11/2/2023	1	L300	Draft interrogatories to defendant	\$710.00	\$710.00
Vaughan, Zachary M	11/3/2023	0.9	L300	Review correspondence from Defendant re Branch data; prepare and send response	\$740.00	\$666.00
Rios, Sophia M	11/3/2023	1.5	L300	Draft [REDACTED]	\$710.00	\$1,065.00
Vaughan, Zachary M	11/6/2023	0.4	L340	Review correspondence from Defendant re expert-focused discovery requests; emails with M. Drake and S. Rios re [REDACTED]	\$740.00	\$296.00
Hibray, Jean	11/6/2023	0.1	L330	Email with team re transcript review	\$450.00	\$45.00
Hibray, Jean	11/6/2023	1.5	L330	Review Gillette transcript for confidential and errata designations	\$450.00	\$675.00
Rios, Sophia M	11/6/2023	0.8	L300	Confer with defendant regarding discovery issues	\$710.00	\$568.00
Hibray, Jean	11/7/2023	1	L330	Review Gillette transcript for confidential and errata designations	\$450.00	\$450.00

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Hibray, Jean	11/7/2023	0.4	L320	Load ██████████ to Rel, code and set up saved searches for S Rios	\$450.00	\$180.00
Rios, Sophia M	11/7/2023	0.5	L300	Confer with defendant regarding discovery issues	\$710.00	\$355.00
Vaughan, Zachary M	11/8/2023	2.4	L340	Review and analyze discovery requests from Defendant re expert disclosures; prepare ██████████; TC with S. Rios re same	\$740.00	\$1,776.00
Vaughan, Zachary M	11/8/2023	0.6	L300	Review correspondence from Defendant re Branch data; prepare response	\$740.00	\$444.00
Hibray, Jean	11/8/2023	0.2	L330	Update notices, email re same	\$450.00	\$90.00
Rios, Sophia M	11/8/2023	0.4	L300	Confer with defendant regarding deposition scheduling	\$710.00	\$284.00
Rios, Sophia M	11/8/2023	0.2	L120	Draft ██████████	\$710.00	\$142.00
Rios, Sophia M	11/8/2023	1	L300	Prepare ██████████	\$710.00	\$710.00
Vaughan, Zachary M	11/9/2023	3.2	L340	Review and analyze discovery requests from Defendant re expert disclosures; prepare ██████████ re same; emails with ██████████ and case team re same	\$740.00	\$2,368.00
Hibray, Jean	11/9/2023	0.3	L330	Finalize and e-serve NODs, send to Lexitas and docket same	\$450.00	\$135.00
Hibray, Jean	11/9/2023	0.4	L320	Review PO, update confidential stamps in Rel, set up production request	\$450.00	\$180.00
Drake, Eleanor Michelle	11/9/2023	0.1	L120	call with team to discuss deadlines and next steps	\$1,180.00	\$118.00
Vaughan, Zachary M	11/10/2023	3.7	L340	Review and analyze discovery requests from Defendant re expert disclosures; prepare ██████████ re same; emails with ██████████ and case team re same; TC with ██████████ and J. Nuss re same; review and analyze documents for potential production	\$740.00	\$2,738.00
Hibray, Jean	11/10/2023	0.2	L320	Review ██████████ docs, submit to Rel	\$450.00	\$90.00
Hibray, Jean	11/10/2023	0.3	L320	Check prod, e-serve on opposing	\$450.00	\$135.00
Vaughan, Zachary M	11/13/2023	4.6	L340	Review and analyze discovery requests from Defendant re expert disclosures; emails and TC with ██████████ and J. Nuss re ██████████; review and analyze documents for potential production; TCs with S. Rios re ██████████ emails with J. Hibray re same	\$740.00	\$3,404.00
Hibray, Jean	11/13/2023	0.6	L340	Review new docs ██████████, submissions ██████████	\$450.00	\$270.00
Rios, Sophia M	11/13/2023	0.4	L300	Review plaintiffs deposition transcripts for confidentiality designations and errata	\$710.00	\$284.00
Vaughan, Zachary M	11/14/2023	1	L120	TC with M. Drake, S. Rios, and J. Murray re ██████████	\$740.00	\$740.00
Vaughan, Zachary M	11/14/2023	5.2	L340	Review and analyze discovery requests from Defendant re expert disclosures; review and analyze documents for potential production; emails with J. Nuss and ██████████ re ██████████; TC and emails with J. Hibray re same	\$740.00	\$3,848.00
Rios, Sophia M	11/14/2023	2.1	L300	Review plaintiffs deposition transcripts for confidentiality designations and errata	\$710.00	\$1,491.00
Rios, Sophia M	11/14/2023	1	L120	Call with co-counsel re ██████████	\$710.00	\$710.00
Rios, Sophia M	11/14/2023	0.8	L160	Draft correspondence to mediator re ██████████	\$710.00	\$568.00
Rios, Sophia M	11/14/2023	0.7	L300	draft and send email to opposing counsel re plaintiffs request for 30B6 and missing verifications	\$710.00	\$497.00
Drake, Eleanor Michelle	11/14/2023	1	L120	call re ██████████	\$1,180.00	\$1,180.00
Vaughan, Zachary M	11/15/2023	0.7	L340	Prepare responses and objections to interrogatories and RFPs	\$740.00	\$518.00
Vaughan, Zachary M	11/15/2023	3.7	L340	Review and analyze documents for potential production; emails with J. Nuss and ██████████ re ██████████; TCs with J. Nuss re ██████████; TC and emails with J. Hibray re same	\$740.00	\$2,738.00
Vaughan, Zachary M	11/15/2023	1.2	L160	Emails with case team ██████████; review and revise same	\$740.00	\$888.00
Hibray, Jean	11/15/2023	0.2	L330	Email clients re ██████████	\$450.00	\$90.00
Hibray, Jean	11/15/2023	0.4	L330	Prepare errata sheets for Moore and Gillette, send ██████████	\$450.00	\$180.00
Hibray, Jean	11/15/2023	0.3	L330	Prepare confidential designation letters for client transcripts, send to opposing and court reporter.	\$450.00	\$135.00
Hibray, Jean	11/15/2023	0.4	L340	Call and email with Z Vaughan re ██████████	\$450.00	\$180.00
Hibray, Jean	11/15/2023	0.2	L340	Review new ██████████ docs and submit to Ricoh	\$450.00	\$90.00
Drake, Eleanor Michelle	11/15/2023	1	L160	review redline and revise letter to mediator re settlement	\$1,180.00	\$1,180.00
Vaughan, Zachary M	11/16/2023	1.2	L340	Review and analyze documents for potential production; emails with J. Nuss and ██████████ re same; emails with J. Hibray re ██████████	\$740.00	\$888.00
Vaughan, Zachary M	11/16/2023	1.1	L340	Prepare responses and objections to Woolfson subpoena	\$740.00	\$814.00

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Vaughan, Zachary M	11/16/2023	0.5	L340	Review and revise responses and objections to interrogatories and RFPs	\$740.00	\$370.00
Vaughan, Zachary M	11/16/2023	0.4	L160	Emails with case team and mediator re [REDACTED]	\$740.00	\$296.00
Hibray, Jean	11/16/2023	0.2	L340	Load additional doc [REDACTED] email Z Vaughan re review ready	\$450.00	\$90.00
Drake, Eleanor Michelle	11/16/2023	0.4	L160	communications with cocounsel re [REDACTED]	\$1,180.00	\$472.00
Vaughan, Zachary M	11/17/2023	0.6	L340	Review, revise, and finalize responses and objections to interrogatories and RFPs; emails with J. Hibray re same	\$740.00	\$444.00
Vaughan, Zachary M	11/17/2023	0.7	L340	Review, revise, and finalize responses and objections to Woolfson subpoena; emails with J. Hibray re same	\$740.00	\$518.00
Vaughan, Zachary M	11/17/2023	2.1	L340	Review and analyze documents for potential production; emails and TCs with J. Hibray re same	\$740.00	\$1,554.00
Hibray, Jean	11/17/2023	0.3	L340	Call and email with Z Vaughan re [REDACTED]	\$450.00	\$135.00
Hibray, Jean	11/17/2023	0.2	L340	Set up production request for [REDACTED] emails with [REDACTED] re same	\$450.00	\$90.00
Hibray, Jean	11/17/2023	0.2	L340	QC prod, email with Z Vaughan re same	\$450.00	\$90.00
Hibray, Jean	11/17/2023	0.6	L340	Proof and finalize Woolfson, Moore and Gillette objections/responses. E-serve with prod.	\$450.00	\$270.00
Vaughan, Zachary M	11/20/2023	0.5	L160	TC with case team and mediator re [REDACTED]	\$740.00	\$370.00
Drake, Eleanor Michelle	11/20/2023	0.5	L160	call with mediator Bob Meyer	\$1,180.00	\$590.00
Hibray, Jean	11/21/2023	0.1	L300	Email re errata additions	\$450.00	\$45.00
Vaughan, Zachary M	11/22/2023	0.3	L160	Emails with case team and mediator re [REDACTED]	\$740.00	\$222.00
Vaughan, Zachary M	11/22/2023	0.4	L340	Emails with opposing counsel re [REDACTED] document production; TC with M. Drake re same; emails with [REDACTED] re same	\$740.00	\$296.00
Rios, Sophia M	11/22/2023	0.4	L160	Review correspondence to mediator re [REDACTED]; review emails re mediator's proposal	\$710.00	\$284.00
Hibray, Jean	11/22/2023	0.3	L320	Review new def prod, submit to Rel	\$450.00	\$135.00
Hibray, Jean	11/22/2023	0.2	L300	Edit errata, resend [REDACTED]	\$450.00	\$90.00
Drake, Eleanor Michelle	11/22/2023	0.6	L160	calls and emails with cocounsel and mediator re [REDACTED]	\$1,180.00	\$708.00
Drake, Eleanor Michelle	11/22/2023	0.4	L130	review correspondence with [REDACTED] re additional discovery	\$1,180.00	\$472.00
Vaughan, Zachary M	11/27/2023	0.4	L340	Emails with [REDACTED] re subpoena document production	\$740.00	\$296.00
Vaughan, Zachary M	11/27/2023	1.3	L160	Emails with case team and mediator re [REDACTED]; review and revise draft term sheet; emails with case team re same	\$740.00	\$962.00
Rios, Sophia M	11/27/2023	0.8	L160	Review correspondence from mediator re [REDACTED]; draft terms sheet	\$710.00	\$568.00
Vaughan, Zachary M	11/28/2023	0.6	L160	Review and revise draft term sheet; emails with case team re same	\$740.00	\$444.00
Vaughan, Zachary M	11/29/2023	0.4	L160	Emails with case team and opposing counsel re draft term sheet	\$740.00	\$296.00
Drake, Eleanor Michelle	11/29/2023	0.7	L160	review and comment on term sheet	\$1,180.00	\$826.00
Rios, Sophia M	11/29/2023	0.4	L160	draft terms sheet	\$710.00	\$284.00
Hibray, Jean	11/30/2023	0.1	L300	Email S Rios re upcoming deadlines	\$450.00	\$45.00
Rios, Sophia M	11/30/2023	0.8	L160	draft terms sheet	\$710.00	\$568.00
Gionnette, Julie	12/1/2023	0.2	L140	download and review docket entries (ECF 84-85); calendar deadline	\$285.00	\$57.00
Hibray, Jean	12/1/2023	0.2	L330	Finalize and e-serve clients' erratas	\$450.00	\$90.00
Hibray, Jean	12/1/2023	0.2	L330	Emails re cancelling depositions	\$450.00	\$90.00
Rios, Sophia M	12/4/2023	4	L160	Draft settlement agreement	\$710.00	\$2,840.00
Rios, Sophia M	12/5/2023	1.4	L160	Draft settlement agreement	\$710.00	\$994.00
Hibray, Jean	12/6/2023	0.3	L140	Review [REDACTED] history, email re same	\$450.00	\$135.00
Rios, Sophia M	12/6/2023	0.3	L160	review and revise draft settlement agreement	\$710.00	\$213.00
Rios, Sophia M	12/7/2023	0.8	L160	review and revise draft settlement agreement	\$710.00	\$568.00
Rios, Sophia M	12/8/2023	4	L160	draft settlement agreement and exhibits	\$710.00	\$2,840.00
Rios, Sophia M	12/11/2023	8.1	L160	draft exhibits to settlement agreement	\$710.00	\$5,751.00
Rios, Sophia M	12/12/2023	1.4	L160	review and revise exhibits to settlement agreement; send drafts to opposing counsel	\$710.00	\$994.00
Rios, Sophia M	12/13/2023	2	L160	review and revise exhibits to settlement agreement	\$710.00	\$1,420.00
Rios, Sophia M	12/14/2023	0.7	L160	Draft RFP for settlement admins	\$710.00	\$497.00

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Drake, Eleanor Michelle	12/14/2023	0.1	L120	meet with team re next steps	\$1,180.00	\$118.00
Hibray, Jean	12/19/2023	3	L100	Drafting of preliminary approval memorandum	\$450.00	\$1,350.00
Rios, Sophia M	12/19/2023	0.1	L160	Confer with Defendant re settlement agreement and RFP	\$710.00	\$71.00
Hibray, Jean	12/20/2023	3.5	L100	Drafting prelim approval, citecheck of caselaw utilized	\$450.00	\$1,575.00
Rios, Sophia M	12/20/2023	0.4	L160	Confer with Defendant re settlement agreement and RFP	\$710.00	\$284.00
Rios, Sophia M	12/21/2023	5.1	L160	Draft and send emails to admins re PO; draft motion for preliminary approval	\$710.00	\$3,621.00
Rios, Sophia M	1/2/2024	2.1	L160	Review edits to Settlement Agreement from opposing counsel; discuss with co-counsel	\$710.00	\$1,491.00
Rios, Sophia M	1/3/2024	0.3	L160	Schedule callw ith opposing counsel; update settlement admins	\$710.00	\$213.00
Vaughan, Zachary M	1/4/2024	0.5	L160	TC with S. Rios, J. Murray, and opposing counsel re settlement issues	\$740.00	\$370.00
Rios, Sophia M	1/4/2024	2.5	L160	prepare for and lead call with opposing counsel re revisions to settlement agreement; consider counter proposals; update settlement admins	\$710.00	\$1,775.00
Rios, Sophia M	1/5/2024	0.7	L160	revise draft motion for preliminary approval based on revisions to settlement agreement	\$710.00	\$497.00
Gionnette, Julie	1/5/2024	0.2	L140	review joint status report (ECF 86); update calendar deadlines	\$285.00	\$57.00
Rios, Sophia M	1/8/2024	0.5	L160	revise draft motion for preliminary approval based on revisions to settlement agreement	\$710.00	\$355.00
Rios, Sophia M	1/9/2024	1.6	L160	revise settlement agreement and RFP based on email from opposing counsel	\$710.00	\$1,136.00
Rios, Sophia M	1/10/2024	0.8	L160	discuss ██████████ with co-counsel; revise settlement agreement and RFP; send to opposing counsel	\$710.00	\$568.00
Gionnette, Julie	1/16/2024	0.2	L140	review order vacating upcoming deadlines and delete those deadlines from the calendar	\$285.00	\$57.00
Rios, Sophia M	1/16/2024	0.6	L160	Review edits to Settlement Agreement from opposing counsel; discuss with co-counsel	\$710.00	\$426.00
Rios, Sophia M	1/17/2024	0.5	L160	Draft status report for court; mail RFP to settlement admins	\$710.00	\$355.00
Rios, Sophia M	1/18/2024	0.8	L160	Answer questions from settlement admins; draft joint status update to court	\$710.00	\$568.00
Rios, Sophia M	1/19/2024	0.7	L160	discuss ██████████ with co-counsel; revise settlement agreement and RFP; send to opposing counsel	\$710.00	\$497.00
Gionnette, Julie	1/22/2024	0.1	L140	review joint status report (ECF 87); calendar deadline	\$285.00	\$28.50
Rios, Sophia M	1/22/2024	3.1	L160	Review estimates from settlement admins; revise settlement exhibits; attention to filing joint status report;	\$710.00	\$2,201.00
Rios, Sophia M	1/23/2024	2.1	L160	Discuss ██████████ with co-counsel and next steps; revise settlement exhibits	\$710.00	\$1,491.00
Rios, Sophia M	1/24/2024	1.5	L160	Prepare for call with settlement admin; revise exhibits	\$710.00	\$1,065.00
Hibray, Jean	1/24/2024	0.1	L160	Circulate ██████████	\$450.00	\$45.00
Rios, Sophia M	1/26/2024	3	L160	Draft motion for preliminary approval; revise settlement exhibits	\$710.00	\$2,130.00
Hibray, Jean	1/26/2024	0.2	L160	Emails re ██████████, pull and update re same	\$450.00	\$90.00
Rios, Sophia M	1/29/2024	1.8	L160	Revise settlement agreement and exhibits	\$710.00	\$1,278.00
Rios, Sophia M	1/30/2024	0.2	L160	Check in with settlement admin re next steps	\$710.00	\$142.00
Hibray, Jean	1/30/2024	0.3	L210	Review draft pa memo, prepare Drake Declaration	\$450.00	\$135.00
Drake, Eleanor Michelle	1/30/2024	0.1	L120	team call to touch base on next steps in litigation	\$1,180.00	\$118.00
Rios, Sophia M	2/1/2024	0.8	L160	Draft motion for preliminary approval; revise settlement exhibits	\$710.00	\$568.00
Rios, Sophia M	2/2/2024	2.7	L160	Draft motion for preliminary approval; revise settlement exhibits and confer with opposing counsel	\$710.00	\$1,917.00
Hibray, Jean	2/2/2024	2	L210	Proof, cite check, verify and update dec/agreement cites, in prelim approval memo.	\$450.00	\$900.00
Gionnette, Julie	2/5/2024	0.5	L160	assemble exhibits to settlement agreement and compile agreement and exhibits into a single PDF; send ██████████ to clients ██████████	\$285.00	\$142.50
Rios, Sophia M	2/5/2024	1.9	L160	Correspond with defense counsel; finalize settlement agreement and all exhibits and send execution copy; review and revise joint status update	\$710.00	\$1,349.00
Gionnette, Julie	2/6/2024	0.1	L140	download and review docket entries (ECF 88-89); calendar deadline	\$285.00	\$28.50
Rios, Sophia M	2/6/2024	1.8	L160	Draft motion for preliminary approval; correspond with plaintiffs re ██████████	\$710.00	\$1,278.00
Drake, Eleanor Michelle	2/6/2024	0.4	L160	review redline and revise declaration in support of settlement approval	\$1,180.00	\$472.00

Berger Montague PC

empname	entrydate	hrs	Task Code	narrative	Lodestar Rate	Lodestar Amount
Gionnette, Julie	2/7/2024	0.1	L140	send settlement agreement to E. Drake and B. Terrell for signatures via DocuSign	\$285.00	\$28.50
Rios, Sophia M	2/7/2024	1.3	L160	Draft motion for preliminary approval and supporting declarations; attention to executing settlement agreement	\$710.00	\$923.00
Hibray, Jean	2/8/2024	0.1	L160	Prepare dec exhibits, circulate	\$450.00	\$45.00
Gionnette, Julie	2/8/2024	0.2	L140	review docket entries (ECF 91-94)	\$285.00	\$57.00
Rios, Sophia M	2/8/2024	0.7	L160	Finalize all documents for preliminary approval motion	\$710.00	\$497.00
Gionnette, Julie	2/13/2024	0.5	L140	review docket entry (ECF 95); calendar all settlement deadlines	\$285.00	\$142.50
Rios, Sophia M	2/13/2024	0.6	L160	Review preliminary approval order and provide to admin; review timeline	\$710.00	\$426.00
Rios, Sophia M	2/13/2024	0.5	L160	Draft motion for fees	\$710.00	\$355.00
Gionnette, Julie	2/14/2024	0.3	L140	review timeline of deadlines received from S. Rios; calendar remaining settlement deadlines	\$285.00	\$85.50
Gionnette, Julie	2/20/2024	0.1	L140	review [REDACTED]	\$285.00	\$28.50
Gionnette, Julie	2/21/2024	0.1	L140	review [REDACTED]; update calendar deadlines	\$285.00	\$28.50
Rios, Sophia M	2/22/2024	0.5	L160	Review notices formatted by settlement admin	\$710.00	\$355.00
Drake, Eleanor Michelle	2/22/2024	0.3	L160	emails with w/ S Rios re [REDACTED]	\$1,180.00	\$354.00
Rios, Sophia M	2/25/2024	0.3	L160	Review notices formatted by settlement admin	\$710.00	\$213.00
Rios, Sophia M	3/1/2024	0.2	L160	Review notices formatted by settlement admin	\$710.00	\$142.00
Hibray, Jean	3/4/2024	0.3	L140	Transfer retention files [REDACTED] to our file.	\$450.00	\$135.00
Rios, Sophia M	3/5/2024	0.2	L160	Review notices formatted by settlement admin	\$710.00	\$142.00
Rios, Sophia M	3/11/2024	0.8	L160	Draft plaintiff declarations	\$710.00	\$568.00
Gionnette, Julie	3/12/2024	0.3	L210	edit and formatting to Cooper Moore declaration	\$285.00	\$85.50
Rios, Sophia M	3/12/2024	1.3	L160	Draft plaintiff declarations; draft and send [REDACTED]	\$710.00	\$923.00
Rios, Sophia M	3/13/2024	2.2	L160	Review time entries for fee motion	\$710.00	\$1,562.00
Rios, Sophia M	3/14/2024	0.5	L160	Review time entries for fee motion	\$710.00	\$355.00
Gionnette, Julie	3/15/2024	1.3	L160	prepare total case expenses spreadsheet	\$285.00	\$370.50
Rios, Sophia M	3/15/2024	1.8	L160	Review time entries for fee motion	\$710.00	\$1,278.00
Rios, Sophia M	3/16/2024	0.4	L160	Review time entries for fee motion	\$710.00	\$284.00
Gionnette, Julie	3/18/2024	0.3	L210	draft notice of change of address for San Diego office	\$285.00	\$85.50
Rios, Sophia M	3/18/2024	1.3	L160	Review time entries and expenses for fee motion	\$710.00	\$923.00
Gionnette, Julie	3/19/2024	0.3	L210	update notice of change of address; finalize and file in WD Wash	\$285.00	\$85.50
Gionnette, Julie	3/19/2024	0.6	L160	edit [REDACTED] report	\$285.00	\$171.00
Rios, Sophia M	3/19/2024	1	L160	Review and revise client declarations; [REDACTED]	\$710.00	\$710.00
Gionnette, Julie	3/20/2024	0.3	L160	run [REDACTED] report and format accordingly	\$285.00	\$85.50
Rios, Sophia M	3/20/2024	1.5	L160	Email co-counsel re [REDACTED]; review and revise motion for fees	\$710.00	\$1,065.00
Rios, Sophia M	3/25/2024	0.2	L160	draft motion for fees	\$710.00	\$142.00
Rios, Sophia M	3/28/2024	2.4	L160	draft motion for fees; [REDACTED]	\$710.00	\$1,704.00
Rios, Sophia M	3/29/2024	0.7	L160	draft motion for fees; [REDACTED]	\$710.00	\$497.00
Rios, Sophia M	4/1/2024	1.8	L160	draft motion for fees	\$710.00	\$1,278.00
Rios, Sophia M	4/4/2024	1.6	L160	draft declaration ISO fees	\$710.00	\$1,136.00
Rios, Sophia M	4/5/2024	1.4	L160	draft declaration ISO fees	\$710.00	\$994.00
	TOTAL	1132.00			TOTAL	\$828,255.00