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OF COUNSEL

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**MEMBER NY AND MA BARS ONLY

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+MEMBER FL BAR ONLY

January 17, 2020

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Building
402 E. State Street
Trenton, New Jersey 08608

**Re: *In Re: Allergan BIOCELL Textured Breast Implant Products Liability
Litigation, MDL NO. 2921***

Dear Judge Martinotti:

Pursuant to Case Management Order No. 2, I submit Plaintiffs' Consensus Proposal for the leadership of this important Multidistrict Litigation ("MDL"). As you aware, the MDL involves the July 2019 worldwide recall of Allergan's textured BIOCELL breast implants and tissue expanders after it became public that the products were tied to cases of breast implant-associated anaplastic large cell lymphoma ("BIA-ALCL"). The MDL is currently comprised of approximately 40 cases, 25 of which are overlapping class actions related to the recall, and 11 of which are individual cases alleging that the recalled implants led to the development of BIA-ALCL. We expect that more individual cases will be filed. As we have represented to your Honor, the issues with Allergan's implants present ongoing and time-sensitive medical issues for thousands of women.

Since the creation of the MDL, Plaintiffs' counsel have worked diligently and cooperatively, and have spent much time and energy over the past week to self-organize and reach consensus on a leadership proposal to effectively and efficiently manage and prosecute this litigation. This process has included several telephone conferences as well as an in-person meeting held on Sunday, January 12, 2020. All Plaintiffs' counsel who filed a case involved in the MDL were invited to participate in these discussions and were also invited to send me a statement whether they were interested in a leadership position, and if so, the level of participation they desired. As a result of these meet and confer efforts, I am pleased to report that Plaintiffs' counsel reached a consensus slate for the leadership of this MDL that is broadly supported. Exhibit A to this letter is a chart that shows the proposed leadership structure for the MDL, and Exhibit B is a proposed Case Management Order No. 3 appointing the structure and setting forth the duties of Liaison Counsel and Co-Lead Counsel.

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The structure consists of a Liaison Counsel, four Co-Lead Counsel, a Settlement Committee consisting of the Liaison Counsel, Co-Lead Counsel, and two additional lawyers, a seven-member Plaintiffs' Executive Committee ("PEC"), and a twelve-member Plaintiffs' Steering Committee ("PSC"). In forming this structure, care was taken to ensure that the proposed leadership slate is inclusive and diverse (gender diverse, ethnically diverse, and regionally diverse), and provides an opportunity for some younger up-and-coming lawyers to gain MDL leadership experience. Further, the attorneys in the proposed consensus leadership slate have a wide array of backgrounds and experiences. In my judgment, all the attorneys on the proposed leadership slate are highly qualified and have a proven ability to work collegially and cooperatively with other lawyers in complex litigation. The attorneys on the proposed leadership slate are also fully committed and prepared to provide the resources (both time and advancement of costs) necessary to efficiently, aggressively, and effectively litigate this matter. Abbreviated resumes of nearly all of the proposed candidates are annexed as Exhibits C-Y.

The nature of the class action and individual claims in this MDL support the leadership structure proposed in Exhibit A. The proposed leadership team at every level includes skilled attorneys with class action expertise and experience, and with mass tort/personal injury expertise and experience. For example, proposed Co-Lead Counsel Virginia Buchanan and Jennifer Lenze are experienced personal injury and mass tort practitioners, while Shanon Carson and Beth Fegan are experienced class action practitioners. The proposed leadership slate collectively has a huge amount of experience and success prosecuting defective products cases and defective medical device cases, and together bring an array of skill sets such as (a) brief-writing, (b) complex litigation management; (c) e-discovery and ESI issues; (d) discovery and depositions; (e) science and experts; and (f) trial. There are many recent precedents where similar structures were adopted and worked efficiently to prosecute similarly complex cases including, for example, in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2672; *In re Liquid Aluminum Sulfate Antitrust Litigation*, MDL No. 2687; and *In re National Prescription Opiate Litigation*, MDL 2804.

Of course, the central themes over what Allergan knew and when it knew it predominates in every case, as well as many issues related to the textured breast implants and their propensity to cause injury. While the class action and individual cases will present some different management requirements, the underlying factual and legal issues overlap and are mostly the same. The leadership in this MDL will need to work cooperatively and collaboratively to advance the common issues to trial as quickly as possible. Here, the centralized leadership structure being proposed is the best way to accomplish that, as the proposed Co-Lead Counsel will have the flexibility to draw upon the substantial qualifications and expertise of those on the PEC and PSC (and other lawyers with the Court's permission) and appoint appropriate workgroups to focus on certain issues in the case, such as written discovery, depositions, third-party discovery, brief-writing, science, and expert issues, class certification, and damages. *See Duke Class Action Best Practices* at 45-46 ("In [hybrid] cases, with the leadership structure that includes representatives of both the class and tort sides of the litigation, a premium is placed on counsel who are willing to understand and, within reason, accommodate the different norms, expectations, and styles of

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“class” and “mass tort” lawyers, especially since, as they occasionally occur, these concepts converge, whether in a class action settlement of mass tort claims, as in the recently approved *NFL Concussion Litigation*, or the “bellwether” trial of class claims or common questions on an “issue” class or statewide class basis, as a step toward an ultimate determination on multi-state or nationwide class claims.”); *see id.* at 41 (“One contemporary trend is to leave specific assignments, within the court-appointed structure, to the discretion and authorization of the Lead or Co-Lead Counsel. This discretion is accompanied, however, by the use of detailed time and costs reporting protocols, adopted by the court through a pretrial order, which all court-appointed counsel and those working for the “common benefit” are required to follow. Such time and costs are then reported regularly, either to lead counsel, to a designee, or to the court on a periodic basis, to assure that all work is authorized and conducted in accordance with these pre-set guidelines.”). With the Court’s permission, after Plaintiffs’ Counsel is appointed, Liaison Counsel and Co-Lead Counsel will submit another proposed order setting forth detailed time and cost reporting protocols intended to ensure, among other things, that tasks are effectively coordinated and work is performed in an efficient and non-redundant fashion.

In sum, the proposed consensus leadership structure in Exhibit A and in the attached proposed Case Management Order No. 3 included as Exhibit B constitutes a group of the most highly qualified class action and mass tort practitioners who will work together to provide the most effective representation to all Plaintiffs in this MDL.

I am available should the Court have any further questions.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

Enclosures

cc: All Counsel of Record (via ECF)

Exhibit A

EXHIBIT A

In Re: Allergan Biocell Textured Breast Implant Products Liability Litigation,
No. 2:19-md-02921 (BRM)(JAD), MDL NO. 2921

Plaintiffs' Proposed Leadership Structure

Liaison Counsel:

James Cecchi
Carella, Byrne, Cecchi, Olstein,
Brody & Agnello, P.C.
5 Becker Farm Road
Roseland, NJ 07068-1739

Co-Lead Counsel:

Virginia Buchanan
Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
316 S. Baylen St., Ste. 600
Pensacola, FL 32502-5996

Jennifer Lenze
Lenze Lawyers, PLC
1300 Highland Ave., Ste. 207
Manhattan Beach, CA 90266

Shanon Carson
Berger Montague
1818 Market St., Ste. 3600
Philadelphia, PA 19103

Elizabeth A. Fegan
Fegan Scott LLC
150 S. Wacker Dr., 24th Floor
Chicago, IL 60606

Plaintiffs' Executive Committee:

Julie Kane
Colson Hicks Eidson
255 Alhambra Cir. Penthouse
Coral Gables, FL 33134

Laura Fitzpatrick
Simmons Hanly Conroy
112 Madison Ave., 7th Floor
New York, NY 10016

Tina Wolfson
Ahdoot & Wolfson, P.C.
10728 Lindbrook Dr.
Los Angeles, CA 90024

Adam Polk
Girard Sharp LLP
601 California St., Ste. 1400
San Francisco, CA 94108

Peter Prieto
Podhurst Orseck P.A.
SunTrust International Center
One S.E. 3rd Ave., Ste. 2300
Miami, FL 33131

Adam Slater
Mazie Slater Katz & Freeman LLC
103 Eisenhower Pkwy.
Roseland, NJ 07068

Pete Kaufman
Panish Shea & Boyle LLP
11111 Santa Monica Blvd., Ste. 700
Los Angeles, CA 90025

Plaintiffs' Steering Committee:

Lori Kier
Sauder Schelkopf LLC
555 Lancaster Ave.
Berwyn, PA 19312

Esther Berezofsky
Motley Rice LLC
210 Lake Dr. East, Ste. 101
Cherry Hill, NJ 08002

Dena Young
Ross Feller Casey
One Liberty Place
1650 Market St., 34th Flr.
Philadelphia, PA 19103

Rachel Soffin
Greg Coleman Law
800 S. Gay St., Ste. 1100

Knoxville, TN 37929

Jean Martin
Morgan & Morgan
201 N Franklin St., 7 th Flr.
Tampa, FL 33602

Tiasha Palikovic
Wittels Law
295 Madison Avenue
New York, NY 10017

David Randolph Smith
David Randolph Smith & Associates
1913 21st Ave. S
Nashville, TN 37212

Nathan Bess
Aylstock, Witkin, Kreis &
Overholtz, PLLC
17 East Main St., Ste. 200
Pensacola, FL 32502

C. Moze Cowper
Cowper Law LLP
10880 Wilshire Blvd., Ste. 1840
Los Angeles, CA 90024

Matthew Dameron
Williams Dirks Dameron LLC
1100 Main St., Ste. 2600
Kansas City, MO 64105

Jonathan Shub
Kohn Swift & Graf, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103

Christopher C. Gold
Robbins Geller Rudman & Dowd LLP
120 East Palmetto Park Road
Suite 500
Boca Raton, FL 33432

Settlement Committee includes: The four Co-Leads and Liaison Counsel plus:

Christopher Seeger
Seeger Weiss LLP
55 Challenger Rd., 6th Floor
Ridgefield Park, NJ 07660

Mark Robinson
Robinson Calcagnie, Inc.
19 Corporate Plaza Dr.
Newport Beach, CA 92660

Exhibit B

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: ALLERGAN BIOCELL TEXTURED BREAST IMPLANT PRODUCTS LIABILITY LITIGATION	: Case No. 2:19-md-02921 (BRM)(JAD) : MDL NO. 2921 : : JUDGE BRIAN R. MARTINOTTI : JUDGE JOSEPH A. DICKSON
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THIS DOCUMENT RELATES TO: ALLCASES

[PROPOSED] CASE MANAGEMENT ORDER #3

The Court, having reviewed all applications for Plaintiffs’ leadership positions, and after consideration of such applications and the consensus recommendations of interested counsel, hereby establishes and formally appoints the following individuals to the following leadership positions:

James Cecchi (Liaison Counsel)
Carella, Byrne, Cecchi, Olstein, Brody &
Agnello, P.C.
5 Becker Farm Road
Roseland, NJ 07068-1739

Virginia Buchanan (Co-Lead Counsel)
Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
316 S. Baylen St., Ste. 600
Pensacola, FL 32502-5996

Jennifer Lenze (Co-Lead Counsel)
Lenze Lawyers, PLC
1300 Highland Ave., Ste. 207
Manhattan Beach, CA 90266

Shanon Carson (Co-Lead Counsel)
Berger Montague PC
1818 Market St., Suite 3600
Philadelphia, PA 19103

Elizabeth A. Fegan (Co-Lead Counsel)
Fegan Scott LLC
150 S. Wacker Dr., 24th Floor
Chicago, IL 60606

Julie Kane (Executive Committee)
Colson Hicks Eidson
255 Alhambra Cir. Penthouse
Coral Gables, FL 33134

Laura Fitzpatrick (Executive Committee)
Simmons Hanly Conroy
112 Madison Ave., 7th Floor
New York, NY 10016

Tina Wolfson (Executive Committee)
Ahdoot & Wolfson, P.C.
10728 Lindbrook Dr.
Los Angeles, CA 90024

Adam Polk (Executive Committee)
Girard Sharp LLP

Peter Prieto (Executive Committee)
Podhurst Orseck P.A.

601 California St., Ste. 1400
San Francisco, CA 94108

SunTrust International Center
One S.E. 3rd Ave., Ste. 2300
Miami, FL 33131

Adam Slater (Executive Committee)
Mazie Slater Katz & Freeman LLC
103 Eisenhower Pkwy.
Roseland, NJ 07068

Pete Kaufman (Executive Committee)
Panish Shea & Boyle LLP
11111 Santa Monica Blvd., Ste. 700
Los Angeles, CA 90025

Lori Kier (Steering Committee)
Sauder Schelkopf LLC
555 Lancaster Ave.
Berwyn, PA 19312

Esther Berezofsky (Steering Committee)
Motley Rice LLC
210 Lake Dr. East, Ste. 101
Cherry Hill, NJ 08002

Dena Young (Steering Committee)
Ross Feller Casey
One Liberty Place
1650 Market St., 34th Flr.
Philadelphia, PA 19103

Rachel Soffin (Steering Committee)
Greg Coleman Law
800 S. Gay St., Ste. 1100
Knoxville, TN 37929

Jean Martin (Steering Committee)
Morgan & Morgan
201 N Franklin St., 7 th Flr.
Tampa, FL 33602

Tiasha Palikovic (Steering Committee)
Wittels Law
295 Madison Avenue
New York, NY 10017

David Randolph Smith (Steering Committee)
David Randolph Smith & Associates
1913 21st Ave. S
Nashville, TN 37212

Nathan Bess (Steering Committee)
Aylstock, Witkin, Kreis &
Overholtz, PLLC
17 East Main St., Ste. 200
Pensacola, FL 32502

C. Moze Cowper (Steering Committee)
Cowper Law LLP
10880 Wilshire Blvd., Ste. 1840
Los Angeles, CA 90024

Matthew Dameron (Steering Committee)
Williams Dirks Dameron LLC
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Kansas City, MO 64105

Jonathan Shub (Steering Committee)
Kohn Swift & Graf, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103

Christopher C. Gold (Steering Committee)
Robbins Geller Rudman & Dowd LLP
120 East Palmetto Park Road
Suite 500
Boca Raton, FL 33432

Mark Robinson (Settlement Committee)
Robinson Calcagnie, Inc.
19 Corporate Plaza Dr.
Newport Beach, CA 92660

Christopher Seeger (Settlement Committee)
Seeger Weiss LLP
55 Challenger Rd., 6th Floor
Ridgefield Park, NJ 07660

Further, the Court appoints as Co-Lead Counsel, Shanon Carson, Elizabeth Fegan, Jennifer Lenze, and Virginia Buchanan and as Liaison Counsel, James Cecchi. Together, and along with Julie Kane, Laura Fitzgerald, Tina Wolfson, Adam Polk, Peter Prieto, Adam Slater, and Pete Kaufman, they shall comprise the Plaintiffs' Executive Committee. The Settlement Committee shall consist of Liaison Counsel, Co-Lead Counsel, Christopher Seeger, and Mark Robinson. It shall be the Co-Lead Counsel's duty to coordinate, supervise, and direct the responsibilities of the Executive Committee and Steering Committee, schedule meetings of those committees, keep minutes or transcripts of these meetings, appear at periodic court noticed status conferences and other hearings, perform other necessary administrative or logistic functions of the Executive Committee and Steering Committee, and carry out any other duties as the Court may order. All appointments stated herein are of a personal nature. Accordingly, the above appointees cannot be substituted by other attorneys, including members of the appointee's law firm, to perform their duties, such as attending committee meetings and court appearances, except with prior approval of the Court. Although no permanent substitutions can be made without leave of court, temporary or occasional substitutions are permitted with approval of one or more of the Co-Lead Counsel due to scheduling conflicts or illness.

Co-Lead Counsel will have the following responsibilities and may delegate tasks to others appointed in this Order as they deem appropriate:

Discovery

(1) Initiate, coordinate, and conduct all pretrial fact and expert discovery on behalf of Plaintiffs in all actions that are consolidated in this MDL.

(2) Develop and propose to the Court schedules for the commencement, execution, and completion of all discovery on behalf of all Plaintiffs.

(3) Cause to be issued in the name of all Plaintiffs the necessary discovery requests, motions, and subpoenas pertaining to any witnesses and documents needed to properly prepare for the pretrial of relevant issues found in the pleadings of this litigation. Similar requests, notices, and subpoenas may

attorney in order to assist him/her in the preparation of the pretrial stages of his/her client's particular claims.

(4) Conduct all discovery in a coordinated and consolidated manner on behalf and for the benefit of all Plaintiffs.

Hearings and Meetings

(1) Call meetings of counsel for Plaintiffs for any appropriate purpose, including coordinating responses to questions of other parties or of the Court. Initiate proposals, suggestions, schedules, or joint briefs, and any other appropriate matter(s) pertaining to pretrial proceedings.

(2) Examine witnesses and introduce evidence at hearings on behalf of Plaintiffs.

(3) Act as spokesperson for all Plaintiffs at pretrial proceedings and in response to any inquiries by the Court, subject of course to the right of any Plaintiff's counsel to present nonrepetitive individual or different positions.

Miscellaneous

(1) Prepare, submit, and argue any verbal or written motions presented to the Court or Magistrate on behalf of Plaintiffs (or delegate same to another person appointed in this Order) as well as oppose when necessary any motions submitted by the Defendants or other parties that involve matters within the sphere of the responsibilities of Co-Lead Counsel.

(2) Negotiate and enter into stipulations with Defendants regarding this litigation. All stipulations, except for strictly administrative details such as scheduling, must be submitted for Court approval and will not be binding until the Court has ratified the stipulation. Any attorney not in agreement with a non-administrative stipulation shall file with the Court a written objection thereto within five (5) days after he/she knows or should have reasonably become aware of the stipulation. Failure to object within the term allowed shall be deemed a waiver and the stipulation will automatically be binding on that party.

(3) Explore, develop, and pursue all settlement and alternative dispute resolution options pertaining to any claim or portion thereof of any case filed in this litigation.

(4) Maintain adequate files of all pretrial matters, including establishing and maintaining a document or exhibit depository, in either real or virtual format, and having those documents available, under reasonable terms and conditions, for examination by all MDL Plaintiffs or their attorneys.

(5) Perform any task necessary and proper to accomplish their responsibilities as defined by the Court's orders, including organizing subcommittees comprised of Plaintiffs' attorneys not on the PSC and assigning them tasks consistent with the duties of the PSC members.

(6) Keep counsel of all Plaintiffs advised of all pertinent developments in the MDL.

(7) Perform such other functions as may be expressly authorized by further orders of this Court.

Dated: January ___, 2020

BRIAN R. MARTINOTTI
UNITED STATES DISTRICT JUDGE

Exhibit C

VIRGINIA M. BUCHANAN

Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.

Virginia Buchanan graduated Summa Cum Laude from the University of Florida College of Journalism, Department of Telecommunication, and thereafter graduated with Honors from the University of Florida Fredric G. Levin College of Law. Upon graduation, Ms. Buchanan joined the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor (“Levin Papantonio”), at which she now is an equity senior Shareholder.

Ms. Buchanan has an extensive trial background, having served as lead or co-lead of more than 50 civil and administrative trials. She chairs her firm’s Medical Negligence Department and has long represented victims of breast cancer. Ms. Buchanan is rated "A-V Preeminent" by the prestigious Martindale-Hubbell lawyer peer-rating service. She has repeatedly been designated a Florida Super Lawyer and chosen by Florida Trend Magazine as a member of the “Legal Elite.” She received the Florida Bar President’s Award for Pro Bono service in the 1st Judicial Circuit. In 2019, she was selected by her peers and leadership as a Distinguished Fellow of the Florida Justice Association and is a Fellow of the American Bar Association. She has won a number of Telly and Aegis Awards for video productions depicting the damages sustained by clients she represented. Ms. Buchanan has been a regular contributor and member of professional committees and organizations at the local, state and national level. She has written numerous articles and co-authored book chapters, including a highly respected anesthesia text reviewed in the Journal of the American Medical Association. She coordinates a medical conference each year in conjunction with Harvard Medical School and Brigham and Womens Health, often lectures on medical and legal issues, and regularly grades the Florida Bar Examinations.

Ms. Buchanan has played an important role in hundreds personal injury, wrongful death and mass tort claims. She was appointed Co-Chair of Class Certification Committee in the *In re Blue Cross Blue Shield Antitrust Litigation*, MDL No. 2406 and supervised a large team of lawyers in privilege log challenges in that litigation in which over a million documents were identified on logs from the various Blues organizations. She was co-lead counsel in the class action *Perrine v. E.I. Du Pont De Nemours & Co., et al*, 225 W. Va. 482 (W.Va. 2010), which resulted in a jury verdict common fund award of \$381 Million and served post-trial on the finance and medical monitoring committees for the community of Spelter, West Virginia. Ms.

Buchanan is admitted to practice in Florida and Alabama. She also has been admitted pro hac vice in a number of venues and handled cases in Florida, Georgia, Alabama, Mississippi, Tennessee, Nebraska, Arkansas, Ohio, West Virginia and New Jersey.

Levin Papantonio was founded in 1955, and began focusing on mass torts plaintiffs' personal injury law in the late 1980s and, more recently, class actions. The firm has earned a reputation as one of the most successful personal injury law firms in the nation, accumulating jury verdicts and settlements exceeding \$4 Billion. The firm owns the national seminar company, Mass Torts Made Perfect, which hosts two major conferences each year which has continued to grow, with more than 1000 attendees per conference. The firm currently employs more than 40 attorneys and more than 100 non-attorney staff. The firm's commitment to outstanding work has resulted in a number of awards and accomplishments, including:

Leadership appointments in more than 50 Multi-District Litigations

Selected Best Law Firms – US News & World Report

Best Lawyers in America

National Law Journal – America's Elite Trial Lawyers & Hall of Fame

President of the National Trial Lawyers

President of the Florida Justice Association (4 past presidents)

President of the Public Investors Arbitration Bar Association

Public Justice Association – Trial Lawyer of the Year Finalist

The firm also contributes to the local community. Levin Papantonio lawyers and employees have donated more than \$35 Million and thousands of volunteer hours to charity. Levin Papantonio lawyers also conduct a semi-annual "People's Law School" to educate local citizens regarding their civil and criminal rights.

Exhibit D



JENNIFER LENZE

Lenze Lawyers, PLC, Owner

Jennifer Lenze is the founding partner and owner of Lenze Lawyers, PLC.

She grew up as an army brat, living around the world with her family, including Germany and Saudi Arabia. She eventually followed them to San Diego, California where she attended the University of San Diego for both college and law school.

She began her legal career at the Los Angeles based Plaintiff firm of Girardi & Keese. Under their direction, she worked on some of the most significant mass tort cases in the country and found her love of being a trial lawyer.

In 2009 she helped begin Sizemore Taylor, LLP with a focus on pharmaceutical mass torts and offices in both Alabama and California. Eventually, she formed her own firm, Lenze Law, PLC out of Manhattan Beach, California.

Following the death of her significant other, Paul Sizemore, in June of 2014, Jennifer became Practice Administrator of the Sizemore Law Firm- a position she maintains to this day. At Sizemore Law Firm, Jennifer assumed Paul's leadership positions in the Zolof, Granuflo and Crestor California Coordinated Proceedings.

In 2016, Jennifer started Lenze Lawyers, PLC with an office in Manhattan Beach, California. She became co-liaison counsel of the Paxil JCCP, and a member of the PSC in the Talc JCCP, Essure JCCP and Onglyza MDL.

Jennifer has been honored to be named one of the Top 40 Under 40 by the National Trial Lawyers. She is proud to hold the distinction of being an all women law firm continuing work in pharmaceutical and medical devices cases, as well as, personal injury, employment law and medical malpractice cases.

She currently resides in Rolling Hills, California with two of her three boys. Her oldest son resides in New York City, where he attends the Tisch School of the Arts at NYU.

Exhibit E

SHANON J. CARSON
BERGER MONTAGUE PC

Biography

Shanon J. Carson is a principal and Managing Shareholder of Berger Montague, and Co-Chair of its Consumer Protection and Employment Law 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 each year since 2015, Mr. Carson has been 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.”

Berger Montague is a national class action and complex litigation law firm headquartered in Philadelphia with offices in Minneapolis, San Diego, and Washington, DC. The Firm, which currently has approximately 70 attorneys and a large support team, litigates complex civil cases and class actions in federal and state courts throughout the United States, and is known for its roles in serving private and governmental clients in the consumer, antitrust, securities, employment, environmental, civil and human rights, whistleblower, and insurance fields. In its over 50 years of operation, Berger Montague has pioneered the use of class actions in America and recovered over \$30 billion for its clients and the classes they have represented.

Known for being able to lead teams and accomplish results, Mr. Carson is regularly appointed by federal courts to serve in lead counsel roles in class actions and is frequently asked to speak at CLEs and other engagements. Mr. Carson serves on the Board of Directors of the Philadelphia Trial Lawyers Association and as a Co-Chair of its Class Action/Mass Tort Committee. Mr. Carson is also a member of the American Association for Justice and other professional organizations.

A proud graduate of the Dickinson School of Law of the Pennsylvania State University, Mr. Carson was a senior editor of the Dickinson Law Review and clerked for a U.S. District Court Judge on the Middle District of Pennsylvania while attending law school. Mr. Carson is now on the Board of Trustees of the Dickinson School of Law of the Pennsylvania State University.

In approving the \$21.4 million class settlement in *Employees Committed for Justice v. Eastman Kodak*, No. 04-CV-6098 (W.D.N.Y. 2010) (Mem. & Order), in which Mr. Carson represented the plaintiffs as co-lead counsel, U.S. Magistrate Judge Jonathan W. Feldman observed on the record:

“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.”

...

“...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.”

In *Merino, et al. v. Wells Fargo & Co., et al.*, No. 2:16-cv-07840-ES-MAH (D.N.J.) (Jan. 13, 2020) (Transcript at p. 77), U.S. District Judge Esther Salas, in granting final approval of a \$35 million class action settlement in which Mr. Carson was appointed as Class Counsel and played the lead role, stated:

The Court also wants to thank the attorneys for the work that you all did. I understand a lot of time went into this case. ... So I thank and commend the attorneys for their hard work, for their effort, for their diligence in staying the course and seeing this through to an amicable resolution. On behalf of the District of New Jersey, I thank all of you.

Selected Other Examples of Recent Notable Case Achievements

In re CertainTeed Fiber Cement Siding Litigation, MDL No. 2270 (E.D. Pa.). Co-Lead Counsel. Mr. Carson obtained a cash settlement of \$103 million in this MDL concerning CertainTeed Corporation’s allegedly defective fiber cement siding.

Cole, et al. v. NIBCO, Inc., No. 3:13-cv-07871-FLW-TJB (April 11, 2019 D.N.J.) (Hon. Freda L. Wolfson). Co-Lead Counsel. Mr. Carson obtained a cash settlement of \$43.5 million on behalf of a nationwide class for damages resulting from leaks from covered tubing, fittings, and clamps.

Clements v. JPMorgan Chase Bank, N.A., No. 3:12-cv-2179 (N.D. Cal.). Co-Lead Counsel. Mr. Carson obtained a settlement of \$22,125,000 for a class of borrowers whose mortgage loans were serviced by JPMorgan Chase and who were injured by lender-placed flood insurance.

Citibank Force-Placed Insurance Litigation, Nos. 5:12-cv-00820, 1:13-cv-353 (N.D.N.Y.). Co-Lead Counsel. Mr. Carson obtained a settlement valued at \$110 million in this consolidated class action on behalf of classes of borrowers injured by lender-placed insurance.

Arnett v. Bank of America, N.A., No. 3:11-cv-1372 (D. Or.). Co-Lead Counsel. Mr. Carson obtained a settlement of \$31 million on behalf of a class of borrowers injured by lender-placed flood insurance.

Jantz v. Social Security Administration, EEOC Case No. 531-2006- 00276X. Co-Lead Counsel. Mr. Carson obtained a \$9.98 million class settlement on behalf of employees with severe disabilities who suffered discrimination, plus significant injunctive relief.

Salcido v. Cargill Meat Solutions Corp., Nos. 1:07-cv-01347-LJO-GSA and 1:08-cv-00605-LJO-GSA (E.D. Cal.). Co-Lead Counsel. Mr. Carson obtained a groundbreaking \$7.5 million settlement on behalf of meat-packing employees alleging off-the-clock work. (Mr. Carson went on to obtain substantial class action settlements from over half a dozen other meat-packing defendants and affected the way timekeeping is conducted for hourly workers in the industry.)

Exhibit F



Elizabeth A. Fegan

Founder and Managing Member Elizabeth Fegan fights for victims of sexual abuse, discrimination, consumer fraud, antitrust violations, toxic torts, and other offenses. In 24 years practicing law, Beth has recovered more than \$1 billion for her clients nationwide.

Beth is on the vanguard in the legal battles surrounding sexual assault, abuse and harassment. She currently serves as lead counsel in the class action lawsuit against disgraced movie mogul Harvey Weinstein. While working on the front lines of the #MeToo and #TimesUp movements, Beth has fought for female students abused by a University of Southern California health center gynecologist. She also settled a nationwide class action alleging sexual harassment on behalf of 16,000 current and former female employees of a commercial property brokerage firm, with potential awards up to \$150,000 each.

Beth also fights for women in her own profession. She authored “An Opportunity or Landmine: Promoting Gender Diversity From The Bench” (The Federal Lawyer, May 2016) and participated in The Duke Judicial Law Center’s Distinguished Lawyers conference on “Guidelines and Best Practices Addressing Chronic Failure to Diversify Leadership Positions in the Practice of Law.”

Courts regularly appoint Beth to lead national class-action cases, citing her experience and dedication to excellence and equity, including several in the area of medical monitoring.

In May 2019, Beth and her husband, Timothy Scott, founded FeganScott, a national law firm specializing in class-action cases, high-stakes, contingent-fee litigation and community-driven legal needs. The Firm is growing at a quick but concerted pace, with offices recently launched in Pittsburgh, Pennsylvania, New York, New York and Washington, D.C.

Prior to founding FeganScott, Beth launched the Chicago office of Hagens Berman Sobol Shapiro, where she grew the firm significantly during her 15 years of leadership as office managing partner. Before that, she was partner at The Wexler Firm in Chicago, where she launched her plaintiffs’-side career.

Additionally, as an associate at Shefsky & Froelich in Chicago, Beth served in several local government appointments, and on special master teams in federal and state court class actions, including with the Hon. Wayne Andersen (ret.), Northern District of Illinois. From 2001-2004, Beth taught legal writing at her alma mater, Loyola University Chicago School of Law.

Beth is a 1995 graduate of Loyola University Chicago School of Law, and is admitted to numerous federal district and appellate courts nationwide. Beth has been recognized as, *inter alia*, an Illinois Super Lawyer (2016-2020), a Lawdragon 500 Leading Consumer Lawyers in America (2020), and a Women of Influence by Best Lawyers, Business Edition (2017). A sampling of her successes follows



CASE HIGHLIGHTS

- *In re NCAA Student-Athlete Concussions* (N.D. Ill.): As part of the lead counsel team on behalf of all current and former NCAA student-athletes, Beth achieved a \$70-million dollar, 50-year medical monitoring program to diagnose short- and long-term effects from post-concussion syndrome and the accumulation of subconcussive hits. The settlement received final approval in 2019.
- *USC Student Health Center Sexual Abuse* (C.D. Cal.): In this Title IX and negligence action for sexual abuse by a university gynecologist of thousands of students, Beth was part of the lead counsel team for the nationwide class. The parties reached a \$240 million settlement, which received preliminary approval in 2019. The final fairness hearing was held in early January 2020.
- *In re Stericycle, Inc., Sterisafe Contract Litig.* (N.D. Ill.): In this nationwide consumer fraud class action, Beth was liaison counsel; the Hon. Milton Shadur recognized Beth as having “outstanding credentials.” *In Re: Stericycle, Inc., Sterisafe Contract Litigation*, MDL No. 2455, Case No. 13 C 5795 (N.D. Ill.) (ECF No. 56). The \$295 million settlement received final approval in March 2018.
- *Senior annuities consumer protection class actions*: In a series of class actions against insurance companies that sold equity-indexed deferred annuities that targeted, but were not appropriate for, senior citizens, Beth was appointed to lead counsel and executive committee positions. These cases led to numerous settlements, including in *American Equity Senior Annuities Fraud* (C.D. Cal.) (\$129 million settlement) and *Midland Senior Annuities Fraud* (C.D. Cal.) (\$79.5 million settlement).
- *Baby Products Antitrust* (E.D. Pa.): As lead counsel for a class of consumers overcharged for high-end baby products (e.g. strollers, high chairs) as the result of a price-fixing conspiracy between Babies ‘R Us and baby product manufacturers, Beth achieved a \$35 million settlement after class certification was granted, summary judgment denied, and on the eve of trial.
- *“Thomas the Tank Engine” Toys Lead Paint Products Liability Litig.* (Cook County, IL): As Lead Counsel in a medical monitoring class action for children exposed to toys painted with lead paint, Beth settled a nationwide class action for \$30 million, including refunds and the costs of blood lead testing.
- *Berry v. City of Chicago*, No. 124999 (Ill. Sup. Ct. 2019). As Lead Counsel in this state court action, Ms. Fegan seeks medical monitoring for lead poisoning on behalf of City residents whose lead service pipes (for water) were partially replaced by the City during construction. While the trial court dismissed the action, the Illinois appellate court reversed, finding that “Where such [medical monitoring] testing is made necessary by defendant's breach of duty, courts have found that the testing itself is ‘a present injury compensable in a tort action.’” *Berry v. City of Chicago*, 2019 Ill. App. LEXIS 356, *20 (Ill. App. May 22, 2019) (on appeal to the Illinois Supreme Court).

Exhibit G



AHDOOT & WOLFSON, PC

ATTORNEYS



Tina Wolfson, Founding Partner

Ms. Wolfson was born in the former Soviet Union and her family escaped when she was eleven years old. Seven years after her family arrived to the United States as indigent political refugees, without speaking any English, she attended Columbia College and graduated *cum laude*.

She then attended and graduated Harvard Law School *cum laude* in 1994. Ms. Wolfson began her civil litigation career at the Los Angeles office of Morrison & Foerster, LLP, where she defended major corporations in complex actions and represented indigent individuals in immigration and deportation trials as part of the firm's *pro bono* practice. She then gained further invaluable litigation and trial experience at a boutique firm, focusing on representing plaintiffs on a contingency basis in civil rights and employee rights cases.

In March 1998, Ms. Wolfson and Robert Ahdoot founded Ahdoot & Wolfson, PC ("AW"), now a nationally recognized law firm that specializes in complex and class action litigation, with a focus on privacy rights, consumer fraud, anti-competitive business practices, employee rights, defective products, civil rights, and taxpayer rights and unfair practices by municipalities. The attorneys at AW are experienced litigators who have vindicated the rights of millions of class members in protracted, complex litigation, to successful results.

AW has been appointed class counsel in numerous class actions, including multidistrict litigation, and, as a founding member, Ms. Wolfson has obtained extensive experience in prosecuting complex class actions.

Consumer Class Actions - Recent Success

In *Eck v. City of Los Angeles*, No. BC577028 (LASC), AW achieved a \$295 million settlement in a case alleging that an 8% surcharge on Los Angeles electricity rates was an illegal tax. Final approval of the settlement was affirmed on appeal in October 2019.

As co-lead counsel in the *Experian Data Breach Litigation*, No. 8:15-cv-01592-AG-DFM (C.D. Cal.), which affected nearly 15 million class members, Ms. Wolfson achieved a settlement conservatively valued at over \$150 million.

In *Kirby v. McAfee, Inc.*, No. 14-cv-02475-EJD (N.D. Cal.), AW was appointed co-lead class counsel in a case arising from McAfee's auto renewal and discount practices; the settlement made \$80 million available to the class and required McAfee to notify customers regarding auto-renewals at an undiscounted subscription price and change its policy regarding the past pricing it lists as a reference to any current discount.

As an invaluable member of a 5 firm PSC, in the *Premera Blue Cross Customer Data Sec. Breach Litigation*, No. 3:15-cv-2633-SI (D. Or.), arising from a data breach disclosing the sensitive personal and medical information of 11 million Premera Blue Cross members, Ms. Wolfson was instrumental in litigating the case through class certification and achieving a preliminarily-approved class settlement valued at \$74 million.

In *Lavinsky v. City of Los Angeles*, No. BC542245 (LASC), a class action alleging the city unlawfully overcharged residents for utility taxes, Ms. Wolfson and AW certified the plaintiff class in litigation and then achieved a \$51 million class settlement.

As co-lead counsel in *Berman v. Gen. Motors, LLC*, No. 2:18-cv-14371-RLR (S.D. Fla.) (vehicle oil consumption defect class action), Ms. Wolfson and AW achieved a \$40 million settlement.

In *Lumber Liquidators Chinese-Manufactured Flooring Durability Marketing & Sales Practices Litigation*, No. 1:16-md-02743-AJT-TRJ (E.D. Va.), a case arising from alleged misrepresentations of laminate flooring durability, which was coordinated with MDL proceedings regarding formaldehyde emissions, AW served as class counsel and was instrumental in achieving a \$36 million settlement.

In *McKnight v. Uber Technologies, Inc.*, No. 3:14-cv-05615-JST (N.D. Cal.), AW achieved a \$32.5 million settlement for the passenger plaintiff class alleging that Uber falsely advertised and illegally charged a “safe rides fee”.

In *The Home Depot, Inc., Customer Data Sec. Breach Litigation*, No. 1:14-md-02583-TWT (N.D. Ga.), Ms. Wolfson served on the consumer PSC and was instrumental in achieving a \$29 million settlement fund and robust injunctive relief to the consumer class.

In *Pantelyat v. Bank of America, N.A.*, No. 1:16-cv-08964-AJN (S.D.N.Y.), a class action arising from allegedly improper overdraft fees, AW served as sole class counsel for plaintiffs and achieved a \$22 million class settlement, representing approximately 80% of total revenues gleaned by the bank’s alleged conduct.

Speaking Engagements and Public Service

Ms. Wolfson frequently lectures on numerous class action topics across the country, including:

- American Conference Institute: “2nd Cross-Industry and Interdisciplinary Summit on Defending and Managing Complex Class Actions,” New York April 2017: Class Action Mock Settlement Exercise featuring the Hon. Anthony J. Mohr;
- Association of Business Trial Lawyers: “Navigating Class Action Settlement Negotiations and Court Approval: A Discussion with the Experts,” Los Angeles May 2017, featuring Hon. Philip S. Gutierrez and Hon. Jay C. Gandhi;
- CalBar Privacy Panel: “Privacy Law Symposium: Insider Views on Emerging Trends in Privacy Law Litigation and Enforcement Actions in California,” Los Angeles March 2017 (Moderator), featuring Hon. Kim Dunning.
- Class Action Mastery Forum at the University of San Diego School of Law (Data Breach/Privacy Class Action Panel), January 2019;
- Federal Bar Association: N.D. Cal. Chapter “2016 Class Action Symposium,” San Francisco December 2016 (Co-Chair), featuring Hon. Joseph F. Anderson, Jr. and Hon. Susan Y. Illston;
- Federal Bar Association: “The Future of Class Actions: Cutting Edge Topics in Class Action Litigation,” San Francisco November 2015 (Co-Chair & Faculty), featuring Hon. Jon S. Tigar and Hon. Laurel Beeler;
- HarrisMartin: “Data Breach Litigation: American Medical Collection Agency, LabCorp and First American Title,” Portland July 2019.

Ms. Wolfson currently serves as a Lawyer Representative for the Ninth Circuit (Central District of California), as Director of Federal Litigation Section of the Federal Bar Association, and on the Board of Public Justice. As a full time single parent, she enjoys hiking, camping and traveling with her 13 year old daughter.

Exhibit H

Girard Sharp LLP

Girard Sharp is a national litigation firm representing plaintiffs in class and collective actions in state and federal courts, and in arbitration matters worldwide. The firm serves individuals, institutions and business clients in cases involving consumer protection, securities, antitrust, personal injury, whistleblower laws, and employment laws.

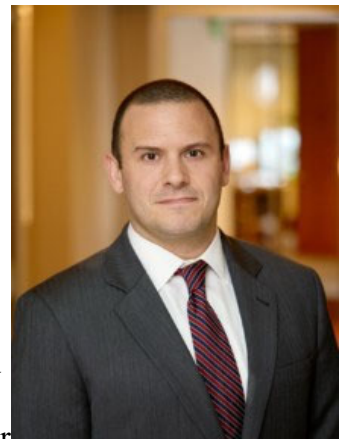
Our clients range from individuals and small businesses to Fortune 100 corporations and public pension funds. We have recovered over a billion dollars on behalf of our clients in class actions and non-class cases. In addition to litigation, our firm also provides consulting and strategic counseling services to institutional clients and professionals in securities litigation, corporate governance and international business matters. We are committed to achieving favorable results for all of our clients in the most expeditious and economical manner possible.

Girard Sharp has been distinguished as a Tier 1 law firm for plaintiffs' mass tort and class-action litigation in the "Best Law Firms" list in the survey published in the U.S. News & World Report's Money Issue. And *The National Law Journal (NLJ)* has named Girard Sharp to its elite "Plaintiffs' Hot List," a selection of top U.S. plaintiffs' firms recognized for wins in high-profile cases. Girard Sharp LLP was also selected as the 2019 Elite Trial Lawyers winner in the category of Insurance Litigation and finalist in the areas of Consumer Protection, Pharmaceutical, and Products Liability Litigation.

Adam Polk

Adam Polk is a partner at Girard Sharp who takes a client-focused approach to each matter he handles. A devoted advocate, Adam rolls up his sleeves and does whatever it takes to give each of his clients the high-quality representation they deserve. Concentrating his practice on complex consumer, securities, and antitrust class actions, Adam's experience covers all aspects of civil litigation, from initial case investigation and complaint preparation through settlement or trial.

Adam currently serves on the lead counsel team in *In re Pacific Fertility Center Litigation*, a hybrid class and individual action related to the alleged failure of an IVF tank holding human eggs and embryos. Adam has taken a leading role in case strategy and has run day to day litigation of the *PFC* case. Adam also is serving as lead counsel in *Bentley, et al. v. LG Electronics U.S.A. Inc.* and *Sosenko, et al. v. LG Electronics U.S.A. Inc.*, class actions alleging that LG's refrigerators are defective and prone to premature failure. Recently, Adam served on the lead counsel teams in *In re Nexus 6P Products Liability Litigation* and *Weeks et al. v. Google, LLC*, two consumer class actions against Google relating to defective mobile phones, which resolved for a combined \$17 million. Adam was also instrumental in several recent matters that have resolved favorably for his clients, including *In re Sears Holdings Corporation Stockholder and Derivative Litigation* (\$40 million settlement) and *Daccache v. Raymond James Financial, Inc. et al.* (\$150 million partial settlement).



Before joining the firm, Adam externed for the Honorable Sandra Brown Armstrong and the Honorable Claudia Wilken, both in the U.S. District Court for the Northern District of California, and also worked as an associate with a mid-sized regional firm, where he represented both plaintiffs and defendants.

Adam is the chair of the American Bar Association's Class Action and Derivative Suits subcommittee, where he is a frequent contributor of written and verbal content regarding emerging issues in class action litigation. His articles include: *Ninth Circuit: Central District of California's 90-Day Deadline to Move for Class Certification Incompatible with Rule 23*, American Bar Association Practice Points, October 2018, *Fourth Circuit, No Presumption of Timeliness Where One Class Action Plaintiff Moves to Intervene in Another Class Action Prior to the Opt-Out Deadline*, American Bar Association Practice Points, July 2018, *California Supreme Court: Unnamed Class Members Must Intervene or Move to Vacate to Gain Right to Appeal Class Settlements*, American Bar Association Practice Points, May 2018, *Tilting at Windmills: Nationwide Class Settlements After In re Hyundai and Kia Fuel Economy Litigation*, ABA Section of Litigation, Class Actions & Derivative Suits, February 2018 (co-author), *"Ninth Circuit." Survey of Federal Class Action Law*, American Bar Association, 2018 (co-author), *Ninth Circuit: No Formal Motion for Reconsideration Needed to Toll 23(f) Deadline*, American Bar Association Practice Points, September 2017, *Eighth Circuit Clarifies CAFA's Local-Controversy Exception Applies to Local Citizens, Not Mere Residents*, American Bar Association Practice Points, May 2017, *Shrink-Wrap Arbitration Clauses Must be Conspicuously Displayed: Ninth Circuit*, American Bar Association Practice Points, April 2017, *Predispute Arbitration Clauses Targeting Public Injunctive Relief Are Unenforceable: CA Supreme Court*, American Bar Association Practice Points, April 2017, *Ninth Circuit: Cy Pres Awards Must be Tailored to Plaintiffs' Claims to Justify a Class Action Release*, American Bar Association Practice Points, February 2017, *Rule 23 Does Not Include an 'Administrative Feasibility Requirement: Ninth Circuit*, American Bar Association Practice Points, January 2017.

Adam has been selected by his peers as a Northern California Super Lawyer, Rising Star, every year since 2013.

Exhibit I

Julie Braman Kane has decades of experience successfully representing plaintiffs in high-stakes litigation. A partner of Colson Hicks Eidson since 1999, she has secured multimillion-dollar verdicts and settlements, including a \$38 million verdict in a medical malpractice and drug negligence case.

An AV-rated trial lawyer by Martindale-Hubbell, a Chambers USA Recognised Practitioner, and Top Twenty Women in Law award recipient, Julie focuses her practice on representing plaintiffs in lawsuits when harmed by the negligence of other individuals or corporations. Her practice includes significant personal injury, commercial, multidistrict and class litigation. She currently serves as Lead and Liaison counsel in the In Re: Monat Hair Products Multidistrict Litigation and on the Plaintiffs' Steering Committee for the In Re: 21st Century Oncology Customer Data Security Breach Litigation.

A champion of civil justice, Julie is a recent past President of the American Association for Justice (AAJ), the world's largest trial bar and leading defender of civil justice. Her commitment to protecting the right to trial by jury is evident in her more than 20 years of service with the AAJ, where she has also served on the Executive Committee and Board of Governors and has chaired its National Finance Council, Products Liability Section, Women's Caucus and Diversity Task Force.

In 2012, with voter suppression legislation on the rise across America, Julie initiated and chaired the Voter Protection Action Committee, an election protection program that provides lawyers in all fifty states to protect the rights of American citizens whose access to the polls is limited. In addition to her national service with AAJ, Julie has served as a Trustee and Co-Chair of the National College of Advocates, on the Board of Directors for the Florida Justice Association, as a Commissioner on the Florida Elections Commission, and as President of the Miami-Dade Chapter of the Florida Association for Women Lawyers.

Julie has earned multiple accolades for her legal prowess, exemplary leadership to the profession, and dedication to the community, consumers and the trial bar. She was recently recognized as a Florida Trailblazer – an elite group of professionals who are innovators and thought leaders. In 2017, she was honored with the University of Miami's Law Alumni Achievement Award as well as Florida Justice Association's B.J. Masterson award, which honors an attorney epitomizing ethical professionalism in his or her career of practicing law. In 2015, she received the *Daily Business Review's* Top Twenty Women in Law award. She is also a past recipient of the *Daily Business Review's* Most Effective Lawyers Award for receiverships, and she was a finalist in the medical negligence litigation category. She also received the *South Florida Business Journal's* Woman Extraordinaire Award. Additionally, AAJ awarded Julie its prestigious Distinguished Service Award, Howard Twiggs Commitment to Justice Award; Marie Lambert Award for leadership; and Joe Tonahill Award for legal excellence. In 2010, the University of Miami School of Law honored Julie with its Alumni Leadership Award. A proud double Hurricane, Julie is a *magna cum laude* undergraduate and *cum laude* graduate of the University of Miami School of Law and the proud vice president of the school's Law Alumni Association.

Recognitions and Awards

- Martindale-Hubbell AV Rating
- Chambers USA Recognised Practitioner
- Summit Council, 2013-present
- SuperLawyers, multiple years through present
- Florida Legal Elite, multiple years through today
- National Trial Lawyers, Top 100 Trial Lawyers, 2012-present
- Florida Trailblazer, *Daily Business Review*, 2019
- Best Lawyers in America, multiple years through present
- American Society of Legal Advocates
- Law Alumni Achievement Award, University of Miami, 2017
- B. J. Masterson Award for Professionalism, 2017
- Matte Belle Davis Award, 2016
- Top Twenty Women in Law, *Daily Business Review*, 2015
- Most Effective Lawyers, *Daily Business Review*
 - 2009, Winner, Receiverships
 - 2009, Finalist, Medical Malpractice
- Woman Extraordinaire 2010, South Florida Business Leader
- American Association for Justice
 - Howard Twiggs Commitment to Justice Award, 2012
 - Women's Caucus, Marie Lambert Award, 2008
 - Joe Tonahill Award, 2008
 - Weideman Wysocki Award (multiple years, 2000-2006)
 - Distinguished Service Award, 2005, 2011

Professional Associations and Appointments

- American Association for Justice, President, 2016-2017
- Justice PAC Board of Trustees, 2008-2010, 2012-present
- Elections Commission, State of Florida, Commissioner, 2008-2011
- University of Miami Law Alumni Association, Vice President, 2019-2020
- Miami-Dade Chapter, Florida Association for Women Lawyers, President, 2009-2010
- AIEG Board of Directors, Treasurer and Executive Committee, 2019-present
- Summit Council, 2013-present
- National College of Advocates Board of Trustees, 2003-2008, Co-Chair, 2007-2009
- Florida Justice Association, Board of Directors, 1998-2018

Bar and Court Admissions

- Florida Bar
- United States District Court for the Southern District of Florida
- United States District Court for the Middle District of Florida
- Supreme Court of the United States of America

Exhibit J

Laura S. Fitzpatrick is a shareholder at Simmons Hanly Conroy, L.L.C. in the Complex Litigation Department. Based out of the New York office, her primary practice is in the area of complex class action and multidistrict litigation, including medical device and pharmaceutical products liability cases as well as clergy sex abuse cases.

Ms. Fitzpatrick has considerable federal court experience as an active member of the bellwether trial teams for the following litigations: *In re: National Prescription Opiate Litigation*, MDL 2804. Northern District of Ohio; *In re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation*, MDL 2244. Northern District of Texas; and *In re Genetically Modified Rice Litigation*, MDL 1811. Eastern District of Missouri. Ms. Fitzpatrick has argued before the Judicial Panel on Multidistrict Litigation on behalf of her clients and is intimately familiar with the MDL practice, having co-authored several bar law journal articles on topics ranging from the ethical considerations of global and class settlements to MDL bellwether trial practice and procedure.

Ms. Fitzpatrick is familiar with all phases of litigation and settlement and has extensive experience both in and out of the courtroom. For the last decade, Laura has worked collaboratively with hundreds of lawyers from dozens of law firms to achieve results for her clients. In addition to her courtroom experience, Ms. Fitzpatrick has become skilled at the nuts and bolts of litigation, including but

not limited to taking depositions, preparing experts, and contributing considerably to strategic decision-making both with respect to pre-liability development as well as settlement negotiations. Having spent her entire career in the MDL space, Ms. Fitzpatrick has gained an unusual amount of experience in just over a decade of practicing.

While Ms. Fitzpatrick has already established herself as a valuable member of every MDL she's been a part of, one of the most impressive instances came just last fall. Ms. Fitzpatrick served as an important member of the Prescription Opiate MDL trial team and was instrumental to its success. She and other members of the firm's team helped to secure \$325 million in settlements for two Ohio counties ravaged by the opioid epidemic. This MDL, dubbed by the New York Times as "the most daunting legal challenge in the country," presented a web of obstacles and challenges that Ms. Fitzpatrick and the rest of the opioid team successfully navigated, setting a precedent of success for further trials to come.

Ms. Fitzpatrick draws on her early experience in federal court from her time as both a judicial extern as well as a law clerk. Ms. Fitzpatrick served as a judicial extern to The Honorable Carl J. Barbier, in the Eastern District of Louisiana from 2008-2009 and then went on to work as a law clerk for The Honorable Tucker L. Melancon in the Western District of Louisiana managing the trial docket there as

well as in the Eastern District of New York and District of Connecticut, where Judge Melancon was a visiting judge.

As a member of one of the largest plaintiff firms in the country, Ms. Fitzpatrick brings a considerable amount of support and resources to any case that Simmons Hanly Conroy is actively involved in and her primary goal has always been to provide the highest quality legal care in an honest, ethical and professional matter. That goal is shared throughout the entire Simmons Hanly Conroy organization and it has been a significant component of the firms' continued success.

With more than 85 attorneys in six offices coast-to-coast, Simmons Hanly Conroy has recovered more than \$7 billion in verdicts and settlements in complex litigation cases for thousands of families throughout the country. Because of their extensive experience, attorneys have continuously been appointed by federal judges to represent the people harmed by defective drugs and devices on a national level.

Representative Cases:

- *In re: National Prescription Opiate Litigation*, MDL 2804. Northern District of Ohio.
- *In re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation*, MDL 2244. Northern District of Texas.
- *St. Louis v. Perlitz et al.*, 3:13-cv-01132, U.S. District Court for the District of Connecticut.
- *In re Actos (Pioglitazone) Products Liability Litigation*, MDL 2299. Western District of Louisiana

- *In re DePuy Orthopaedics, Inc., ASR Hip Implant Products Liability Litigation*, MDL 2197. Northern District of Ohio
- *In re: Volkswagen “Clean Diesel” Marketing, Sales Practices, And Products Liability Litigation*, MDL No. 2672. Northern District of California
- *In re: Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Product Liability Litigation*, MDL 2151. Central District of California.
- *In re Zimmer NexGen Knee Implant Products. Liability Litigation*, MDL 2272 Northern District of Illinois.
- *In re Biomet M2a Magnum Hip Implant Products Liability Litigation*, MDL 2391. Northern District of Indiana
- *In re Oil Spill by the Oil Rig “Deep Water Horizon” in the Gulf of Mexico, on April 20 2010 Litigation*, MDL 2179. Eastern District of Louisiana.
- *In re Nuvaring Products Liability Litigation*, MDL 1964. Eastern District of Missouri.
- *In re Pool Products Distribution Market Antitrust Litigation*, MDL 2328. Eastern District of Louisiana.
- *In re Genetically Modified Rice Litigation*, MDL 1811. Eastern District of Missouri

Bar and Court Admissions

- Louisiana Bar
- United States District Court for the Western District of Louisiana
- United States District Court for the Eastern District of Louisiana
- United States District Court for the Middle District of Louisiana
- United States Court of Appeals for the Fifth Circuit

Exhibit K

Peter Prieto, Esq. Podhurst Orseck, P.A

Peter Prieto's Experience: Peter Prieto of Podhurst Orseck, P.A., has focused his practice on complex commercial litigation, including class actions and MDLs. He has represented clients—both individual and corporate—in a wide array of civil litigation, including business and employment disputes, healthcare, antitrust, products liability, RICO, and class action litigation. Peter has also represented clients in criminal investigations and prosecutions involving public corruption, business, banking and healthcare fraud, environmental and antitrust violations, and money laundering. Peter is a Fellow of the American College of Trial Lawyers and of the International Academy of Trial Lawyers. In 2017, Peter was named one of the Top Latino Lawyers in the country.

Peter has substantial experience in MDL and class action proceedings, including the following:

1. *In re: Takata Airbag Products Liability Litigation*, MDL No. 2599 (S.D. Fla.): Plaintiffs' Chair Lead Counsel for economic loss and personal injury tracks.
2. *In re: Farm-Raised Salmon and Salmon Products Antitrust Litigation*, Case No. 19-21551-Civ-Altonaga: Co-Lead Counsel for Plaintiffs.
3. *In re: General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (S.D.N.Y.): member and only Florida attorney on ten-person Plaintiffs' Executive Committee.
4. *In re: Blue Cross Blue Shield Antitrust Litigation*, MDL No. 2046 (N.D. Ala.): Chair of the Experts Committee; and
5. *In re: Checking Account Overdraft Litigation*, MDL No. 2036 (S.D. Fla.): through his firm, Plaintiffs' Executive Committee.

Prior to joining Podhurst Orseck, Peter was a federal prosecutor with the United States Attorney's Office for the Southern District of Florida, where he served as Deputy Chief of the Economic Crimes Section, and later with the Office of Independent Counsel in Washington, D.C., where he worked on the criminal investigation of the late Secretary of Commerce, Ronald H. Brown. For over a decade, Peter was also a partner and trial lawyer with the firm of Holland & Knight LLP, where he served as Executive Partner of the firm's 120-lawyer Miami office and later Chair of the firm's 400-lawyer litigation section.

Trial & RICO Experience: Peter has tried over thirty (30) cases to verdict or judgment, more than twenty (20) of which were tried to juries. Several of those cases—which he tried as an Assistant United States Attorney, and since 1996, as a private practitioner—were complex fraud cases. For example, as an Assistant United States Attorney, Peter prosecuted and convicted a developer and a lawyer—in two separate weeklong trials—for bank fraud and mail fraud. *See United States v. Brown*, 983 F.2d 201 (11th Cir. 1993); *United States v. DeLoach*, 34 F.3d 1001 (11th Cir. 1994). More recently, in 2012, after a week and a half long trial, he obtained a plaintiff's verdict against Stiefel Laboratories, Inc., now a subsidiary of GlaxoSmithKline, and its former Chairman and CEO, Charles W. Stiefel, for securities fraud based on the company's failure to disclose its merger negotiations with GlaxoSmithKline. That jury verdict was affirmed on appeal. *Finnerty v. Stiefel Laboratories, Inc.*, 756 F.3d 1310 (11th Cir. 2014), *cert. denied*, 135 S. Ct. 1549 (2015).

Over the last two decades, Peter has also litigated several RICO cases. He has prosecuted RICO cases, *see United States v. Wai-Keung*, 115 F.3d 874 (11th Cir. 1997) (affirming conviction of one of several defendants in multi-count RICO indictment), as well as defended them, *see Boca Raton Community Hosp., Inc. v. Tenet Health Care Corp.*, 582 F.3d 1227 (11th Cir. 2009) (affirming summary judgment for defendant in RICO class action).

Recognition: For his litigation skills, Peter has been recognized for over a decade as one of the “Top Lawyers in South Florida,” according to the *South Florida Legal Guide*, and is listed in *The Best Lawyers in America*, *Florida’s Legal Elite*, and *Chambers USA*, which has praised Peter for being “thorough in his advice” to clients, his “trial experience and plain speaking good judgment,” “always [being] perfectly prepared,” and being a “levelheaded, confident team player.”

Bar & Professional Involvement: Peter was admitted to the Florida Bar in 1985, and is also a member of various other Bars, including the Supreme Court of the United States, Eleventh Circuit Court of Appeals, the American Bar Association, and the Cuban-American Bar Association.

Peter recently served as the Eleventh Circuit’s representative on the America Bar Association’s Standing Committee on the Federal Judiciary—the committee responsible for evaluating the professional qualifications of all federal judicial nominees. Peter is also a member of the Board of Trustees of St. Thomas University. He also serves on the Duke Law Center for Judicial Studies Advisory Council.

Education: Peter Prieto received a Bachelor’s Degree, *summa cum laude*, from St. Thomas University, and his Juris Doctorate, *cum laude*, from the University of Miami School of Law. While in law school, he served as a member of the Moot Court Board and as an article and comments editor for the *University of Miami Law Review*.

Podhurst Orseck, P.A.: Since the firm’s founding, over half a century ago, Podhurst Orseck has been dedicated to providing its clients with the highest caliber of representation in complex products liability, mass tort, commercial, and class action litigation. Throughout its history, the firm has been involved at the leadership level in dozens of MDLs.

Podhurst Orseck has also received significant recognition and awards. For example, *Chambers* has described the firm as an “undeniably brilliant trial and appellate boutique” and as “outstanding in any kind of litigation.” In 2012, the firm was named to the *National Law Journal*’s Litigation Boutiques Hot List, which featured ten (10) firms around the country “that take second place to no one in courtroom skill” and “who important clients turn to for state of the art advocacy in bet-the-company cases.” For two years in a row, in 2013 and 2014, the *Daily Business Review* has recognized the firm with its Litigation Department of the Year award.

Exhibit L

Pete Kaufman
Panish, Shea & Boyle, LLP

Formerly a shareholder in the Florida-based national mass tort litigation firm Levin, Papantonio P.A., attorney Pete Kaufman joined Panish Shea & Boyle LLP in 2010. Mr. Kaufman specializes in mass tort pharmaceutical and medical device litigation.

Since 2001, he has tried cases in numerous pharmaceutical and medical device litigations, including Accutane, Vioxx, Phenylpropanolamine (PPA), Fen-Phen/diet drugs, Adderall, and the ASR Hip Replacement Device. During that time, Mr. Kaufman received verdicts in excess of \$50 million and settlements of nearly \$250 million. He has played a central role in a number of national pharmaceutical and device litigations. Mr. Kaufman is currently liaison and lead Plaintiffs Counsel in the California Judicial Council Coordinated Proceeding (“JCCP”) 4886 Olympus Duodenoscope cases. He was a member of the leadership in the ASR and Pinnacle Hip JCCPs, and served on the Plaintiff’s Steering Committee for the Pinnacle Hip Multi-District Litigation (MDL). Mr. Kaufman was the co-chair of the Trial Package committee for the Vioxx MDL, which resulted in a \$4.7 billion national settlement. He also served on the Discovery and Science committees in the Vioxx litigation and tried Vioxx cases in New Jersey, Louisiana, Florida and California. In the Bextra/Celebrex litigation, he was a member of the MDL Plaintiff’s Steering Committee and resolved hundreds of cases involving plaintiffs who suffered heart attacks and strokes. In the coordinated Baycol litigation, in state court in Philadelphia, Pennsylvania, Mr. Kaufman served on the discovery and deposition committees, worked with leading medical experts on a major national class action case, and settled nearly 100 individual cases. Mr. Kaufman has also resolved claims related to Stevens-Johnson Syndrome, the drugs Rezulin and Ketek, for liver-related injuries, Accutane, and numerous other personal injury cases.

In 2019, Mr. Kaufman won appeals in Pennsylvania Superior Court finding that a Japanese manufacturer was subject to personal jurisdiction in Pennsylvania, and that cases involving it and its American sister corporations had to proceed in Philadelphia, after defendants sought to have the case transferred. *Vaughan Estate of Vaughan v. Olympus America, Inc.* (Pa. Super. Ct. 2019) 208 A.3d 66, reargument denied (June 11, 2019). In 2009, Mr. Kaufman handled one of the first cases in the country against a generic drug manufacturer, in which the court held that generic manufacturers of drugs have the same liability as brand-name manufacturers, *Munroe v. Barr Laboratories Inc.*, 2009 WL 4047949 (N.D.Fla., 2009). Currently, Mr. Kaufman’s practice is focused primarily on medical device litigation.

In addition to his work in mass tort litigation, Mr. Kaufman handles catastrophic personal injury cases throughout California. Since 2017, he has resolved cases involving school districts (2019, Ventura Unified School District - \$16,000,000), agricultural and trucking companies (2018, Bakersfield - \$21,000,000), medical malpractice, including multiple cases involving Ronald Reagan UCLA Medical Center totaling \$16,000,000 (2017, 2018). In 2017, Mr. Kaufman won a verdict finding the owners of a Palm Springs motel

were personally responsible for the death of a guest who was tragically killed by carbon monoxide poisoning.

Mr. Kaufman is a frequent speaker on pharmaceutical litigation, covering topics such as scientific evidence, trial preparation and case selection criteria.

Mr. Kaufman received his Bachelor of Arts degree, with honors, from the University of Wisconsin-Madison and his law degree from University of Florida Fredric G. Levin College of Law. Mr. Kaufman is a veteran of the United States Army and a graduate of the Defense Language Institute. He served with the 3d Armored Division, 533d Military Intelligence Battalion in Operations Desert Shield and Desert Storm.

Mr. Kaufman is licensed to practice law in California and Florida and before the United States Court of Appeals for the Eleventh Circuit, the United States District Court for the Central District of California and the United States District Court for the Northern and Middle Districts of Florida.

Exhibit M



Adam M. Slater

Adam M. Slater is a graduate of Tulane University, and Boston University School of Law, and a partner in Mazie Slater Katz & Freeman, LLC in Roseland, New Jersey. Mr. Slater is certified as a civil trial attorney by the Supreme Court of New Jersey, and specializes in complex civil litigation cases, including mass torts, product liability including medical devices and pharmaceuticals, professional and medical malpractice, personal injury, and class actions. He has obtained numerous substantial verdicts and settlements and has successfully argued appeals in the New Jersey Supreme Court, Appellate Division, and Third Circuit Court of Appeals.

Mr. Slater has leadership experience in complex mass litigation. He currently serves as co-lead counsel in the In re Benicar MDL, which is assigned to the Hon. Robert E. Kugler, U.S.D.J. in the United States District Court, in Camden, New Jersey, which settled for \$358 million, and co-lead counsel in the In Re Valsartan MDL, also assigned to Judge Kugler. Mr. Slater has also been appointed co-lead counsel of class actions including Delguercio/Dewey v. Volkswagen et al. in the United States District Court, District of New Jersey, and Overton v. Sanofi-Aventis, et al., also in the United States District Court, District of New Jersey.

Mr. Slater also serves as Plaintiffs' liaison counsel for the pelvic mesh MCL's pending against Johnson & Johnson and Ethicon, and C.R. Bard, in the New Jersey Superior Court, currently assigned to the Hon. Rachelle L. Harz, J.S.C. He was lead trial counsel for Gross v. Gynecare, et al., the first trial in the United States against Ethicon and Johnson & Johnson, held in the New Jersey Superior Court in January-February, 2013. The trial resulted in a verdict for the plaintiffs of \$11.1 million, including punitive damages of \$7.76 million, and the Judgment was affirmed by the New Jersey Appellate Division, with certification denied by the New Jersey Supreme Court. Mr. Slater has been trial counsel in numerous other pelvic mesh cases around the country, including a \$68 million verdict against C.R. Bard in April 2018 in New Jersey Superior Court (\$35 million punitive damages), a \$15 million verdict against Ethicon in December 2017 in New Jersey Superior Court (\$10 million punitive damages), and a \$12.5 million verdict in the first pelvic mesh case tried in the Philadelphia Court of Common Pleas in December, 2015 (punitive damages of \$7 million).

Exhibit N

ESTHER E. BEREZOFSKY



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eberezofsky@motleyrice.com • www.motleyrice.com



A trial lawyer with more than 30 years of experience litigating complex mass torts, Esther Berezofsky has devoted her career to representing communities impacted by environmental contamination and fighting for the rights of consumers, individuals and families impacted by fraud and misconduct across a range of litigation areas.

Esther focuses her practice on protecting the rights and seeking accountability for people harmed by toxic chemical exposure—environmental and occupational—as well as patients who suffer life-altering complications caused by dangerous and defective medical drugs and devices.

Prior to becoming an attorney, Esther practiced as a clinical psychologist and consultant for a national network of law firms on post-traumatic stress and community trauma arising out of environmental disasters such as Three Mile Island, Pa., and Times Beach, Mo. She currently serves on the Executive Committee as class counsel for residents exposed to lead contaminated water in the Flint water crisis litigation, in addition to litigating similar cases in Fresno, Calif. She also represents residents in Kent County, Mich., Hoosick Falls, N.Y. and Petersburg, N.Y. in PFAS litigation against corporations such as 3M, Wolverine, St. Gobain and others accused of manufacturing and wrongfully disposing of PFAS chemicals. She was lead counsel for a cancer cluster of children in Toms River, N.J, the story of which is memorialized in the Pulitzer prize winning book: *Toms River: A Story of Science and Salvation*.

In addition to her environmental and toxic exposure work, Esther has held numerous leadership positions and represented clients in MDLs and other litigations involving medical drugs and devices including Medtronic Pain and Insulin Pumps, DePuy ASR, Pinnacle and Stryker Hip Implant cases, Benicar, Risperdal, Xarelto, Hormone Replacement Therapy (HRT), Ortho Evra, Rezulin, PPA, Invokana, Taxotere, Fen-Phen, among others.

She also represents plaintiffs in consumer class actions alleging fraudulent student loan schemes and consumers in pay day lending cases. She has also litigated rent-to-own and option ARM fraudulent mortgage claims, among other consumer protection cases.

Prior to joining Motley Rice, Esther founded Berezofsky Law Group in New Jersey where she pursued complex consumer mass torts. Prior to that, she was a name partner in a plaintiffs' law firm in Philadelphia for more than two decades. She has been active in the legal community has held leadership roles at several law firms in Philadelphia and New Jersey.

PRACTICE AREAS:

Consumer Fraud Protection
Medical Devices
Medical Drugs
Toxic Exposure
Environmental Contamination

EDUCATION:

J.D., Rutgers University School of Law, 1987
M.A., Wayne State University, 1982
B.A., Wayne State University, 1980

LICENSED IN:

New Jersey
Pennsylvania

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court
U.S. Court of Appeals for the Third Circuit
U.S. District Court for the District of New Jersey, the Eastern District of Pennsylvania, the Eastern and Western Districts of Michigan, and the Northern District of New York

Continued...

ESTHER E. BEREZOFSKY

Continued...



Active in the legal community, Esther previously served as Board President of Public Justice, a national public interest law firm, and continues to serve on its Board of Directors. She also sits on the Board of Governors of the New Jersey Association of Justice and was awarded the Gold Medal for Distinguished Service in 2008.

She is a frequent speaker and lecturer on matters related to environmental contamination and toxic exposure, product liability and mass torts. She served as an adjunct professor on trial advocacy at Rutgers Law School, her alma mater in 2014. While completing her legal studies at Rutgers Law, Esther served as an articles editor for the *Rutgers Law Journal*.

Member

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SELECTED PUBLICATIONS:

- Post- Traumatic Stress Disorder and the Technological Disaster, 18 *Rutgers Law Journal* 623 (1987), reprinted in *BNA Toxic Law Reporter*, Vol. 2 No. 11 (August 12, 1987)
- Toxic Tort Litigation the Future Impact of Current Legislation, *Trial Magazine* (October 1988), reprinted in *The Superfund Report*, Mealey Publications (December 1988)
- New Jersey Mass Torts & Class Action Treatise, Chapter 5 *Environmental Torts* 2016
- Legal and Liability Considerations in Asbestos, Chapter in *The Hazardous Fiber*, CRC Press, Inc. *Trial Magazine* (January 2012)

ASSOCIATIONS:

American Association for Justice, Chair, Section on Toxic Environmental and Pharmaceutical Executive Committee

Public Justice, Past President and current member of the Board of Directors

New Jersey Association of Justice, Board of Governors

AWARDS AND ACCOLADES:

Super Lawyers®

2007–2018 New Jersey Super Lawyers® list

New Jersey Association for Justice

2008 Gold Medal for Distinguished Service

Motley Rice LLC, a South Carolina Limited Liability Company, is engaged in the New Jersey practice of law through Motley Rice New Jersey LLC. Esther Berezofsky attorney responsible for New Jersey practice.

Exhibit O

Lori G. Kier serves as Of Counsel at the law firm of Sauder Schelkopf, LLC, a nationally recognized class action and personal injury law firm. The firm's partners currently serve as court appointed lead and co-lead counsel in class actions pending in courts across the country.

At the firm, Ms. Kier handles complex cases on behalf of individuals, consumers, victims of sexual misconduct, small businesses and employees. Beginning as early as June 2019, Ms. Kier has been actively involved in developing and prosecuting an action against Allergan for breast implant-associated anaplastic large cell lymphoma, associated with Allergan BIOCELL textured breast implants. She has personally interviewed scores of women who currently have (or previously had) the covered implants – about half of whom are breast cancer survivors.

Ms. Kier handles complex cases on behalf of individuals, victims of sexual misconduct, consumers, small businesses and employees. Ms. Kier currently represents victims of sexual abuse across the country including University of Southern California, Rockefeller University Hospital, Huntington Memorial Hospital and various Catholic Archdioceses. She has also handled multiple consumer protection actions, including cases involving household consumer products, appliances and vehicles.

Ms. Kier is an experienced attorney with a broad litigation background, including nearly 25 years of service as Senior Assistant Regional Counsel at the U.S. Environmental Protection Agency in Philadelphia. At EPA, Ms. Kier developed and prosecuted enforcement cases (administrative and judicial) under multiple state and federal environmental statutes, including all aspects of litigation. In many of her cases, she worked closely with the U.S. Department of Justice and several U.S. Attorneys Offices. While at EPA, Ms. Kier received numerous awards for her work, including an EPA Bronze Medal for the Revised Total Coliform Rule in Pennsylvania and Virginia; a Federal Executive Board Gold Medal for Scientific Achievement as part of a Perfluorinated Chemicals Investigation Team; and a U.S. Department of Justice Commendation Certificate for support of a Clean Water Act case against a steel manufacturer.

Prior to her time at EPA, Ms. Kier served as a staff attorney at the U.S. Court of Appeals for the Third Circuit and as a Law Clerk to U.S. District Judge Fred I. Parker (D.Vt.). Ms. Kier has a law degree from the University of Pennsylvania Law School, where she participated in the Environmental Law Society and various clinical programs.

Exhibit P



Matthew L. Dameron
1100 Main Street, Suite 2600
Kansas City, Missouri 64105
(816) 945-7135
matt@williamsdirks.com

Matt is an equity partner at Williams Dirks Dameron LLC. Matt's practice focuses on handling class actions, business and commercial disputes, and other complex matters. Matt is currently handling the following matters:

- Litigation on behalf of the City of Kansas City, Missouri, and Jackson County, Missouri related to the opioids crisis (selected by both clients after a competitive application process).
- Litigation on behalf of the City of Kansas City, Missouri against gun manufacturers and distributors.
- An antitrust matter on behalf of the Mississippi Attorney General's Office concerning alleged anticompetitive conduct by manufacturers of automotive component parts.
- A class of homeowners and residents whose water supply was harmed by calcium scaling in the water.
- A proposed class of consumers injured by the anti-competitive conduct of the National Association of Realtors and other real estate entities.
- A proposed class of consumers who purchased food products with misleading labels.
- A proposed class of Nissan owners who experienced floorboard rust in their vehicles due to the vehicle's defective design.
- Two proposed classes on behalf of Missouri consumers who paid unlawful fees for their medical health records.

Matt also previously was appointed to serve as a Special Prosecutor for the Prosecuting Attorney's office in Jackson County, Missouri.

PROFESSIONAL EXPERIENCE AND EDUCATION

Matt previously was a partner at Stueve Siegel Hanson LLP in Kansas City. During his time there, Matt worked on the lead counsel team for several class and MDL cases, including matters concerning securities litigation, wage and hour enforcement, and consumer protection cases. Matt also handled commercial litigation matters on behalf of individual clients.

From 2009 to 2012, Matt served as Chief of Staff for Missouri Attorney General Chris Koster. In his capacity as Chief of Staff, Matt served on the Executive Team that managed significant litigation on behalf of the State of Missouri. Matt also engaged with other state attorneys general

in multi-state investigations, and coordinated efforts with other state and federal authorities including the Department of Justice and the SEC.

Matt previously clerked for the Honorable Nanette K. Laughrey, United States District Judge for the Western District of Missouri. Matt also previously worked as an associate at then-Blackwell Sanders Peper Martin LLP (now Husch Blackwell). At Blackwell, Matt's practice focused on labor and employment matters, education law, and commercial litigation.

Matt earned his law and undergraduate degrees from the University of Missouri. In law school, he served as Editor in Chief of the Journal of Dispute Resolution.

PROFESSIONAL INVOLVEMENT

The U.S. District Court for the Western District of Missouri has entrusted Matt with several leadership roles, including: (1) appointing him twice to serve on the Court's Magistrate Selection Panel—the Panel that vets applicants for Magistrate Judge positions before final selection by the District Court; (2) serving on the committee responsible for formulating the Court's ESI Principles; and (3) serving on the Court's Civil Practice Committee.

Matt also serves on the governing boards for the following legal organizations:

- Legal Aid of Western Missouri (Vice President; Past Treasurer; Executive Committee; Executive Director Search Committee);
- Missouri Association of Trial Attorneys (Board of Governors; AAJ State Delegate); and
- Federal Court Advocates Section for the Kansas City Metropolitan Bar Association (Chair).

HONORS AND AWARDS

In 2012, the University of Missouri School of Law named Matt its Distinguished Recent Graduate, and Missouri Lawyers Weekly identified him as an "Up and Coming Lawyer" in 2011. In 2016, Ingram's magazine—Kansas City's premier business publication—named Matt one of its 40 Under Forty honorees. Additionally, he is consistently recognized as a Missouri & Kansas Super Lawyer, and Best of the Bar by the Kansas City Business Journal.

Founded in 2010, Williams Dirks Dameron LLC is a Kansas City-based law firm specializing in complex litigation, including class actions, business litigation, and other complex matters. The firm handles cases in federal and state courts across the country. The firm has ten attorneys and three support staff, and it is well-capitalized to financially contribute to ongoing litigation as needed.

Exhibit Q



CHRISTOPHER C. GOLD

Partner

Boca Raton | T: (561) 750-3000

E: cgold@rgrdlaw.com

Christopher Gold is a partner in Robbins Geller Rudman & Dowd LLP's Boca Raton office. His practice focuses on mass tort and class action litigation involving consumer fraud, privacy and data breach issues, and securities fraud. He has worked on a number of notable cases and has successfully recovered millions of dollars on behalf of clients.

Christopher was integral in obtaining a settlement valued at \$15 million in *In re Sony Gaming Networks & Customer Data Security Breach Litigation*, concerning claims related to the massive data breach of Sony's PlayStation Network. Christopher is actively involved in *In re Yahoo! Inc. Customer Data Security Breach Litigation* in the Northern District of California, which arises from the largest data breach in history. He is also actively involved in *In re Facebook Biometric Information Privacy Litigation*, a cutting-edge nationwide privacy consumer class action in California concerning Facebook's alleged privacy violations through its alleged collection of user's biometric identifiers without informed consent, as well as *In re Intel Corp. CPU Marketing, Sales Practices and Products Liability Litigation* and *Hauck v. Advanced Micro Devices, Inc.*, two cases arising from the so-called "Meltdown" and "Spectre" vulnerabilities that allegedly exist in virtually all modern computer chips. Other notable consumer cases Christopher has worked on include: *Friedman v. AARP, Inc.*, 855 F.3d 1047 (9th Cir. 2017); *In re Clorox Consumer Litig.*, 894 F. Supp. 2d 1224 (N.D. Cal. 2012); *Dumont v. Litton Loan Servicing, LP*, No. 12 Civ. 2677 (ER), 2015 U.S. Dist. LEXIS 29787 (S.D.N.Y. Mar. 11, 2015); *Lesti v. Wells Fargo Bank, N.A.*, 960 F. Supp. 2d 1311 (M.D. Fla. 2013).

In the securities fraud space, Christopher helped achieve a \$15 million settlement in *Boland v. Gerdau S.A., et al.* (S.D.N.Y.), on behalf of investors in a Brazilian steel conglomerate, which failed to disclose its alleged bribery of Brazilian tax authorities. In *In re Winn-Dixie Stores, Inc. S'holder Litig.* (Fla. 4th Cir. Ct.), Christopher helped to achieve a \$9 million settlement (a Florida record in corporate takeover litigation) for former Winn-Dixie shareholders whose stock was undervalued in a buyout of the company. In *In re AuthenTec, Inc. S'holder Litig.* (Fla. 18th Cir. Ct.), he helped to achieve a \$10 million settlement (a new Florida record in corporate takeover litigation) on behalf of the former shareholders of AuthenTec following a buyout by Apple, which incorporated AuthenTec's fingerprint technology into the Apple iPhone.

Christopher has been recognized as a 2019 Super Lawyer Rising Star. He earned a Bachelor of Science degree in Business Administration from Lynn University and a Juris Doctor degree from DePaul University College of Law.

Christopher is fluent in Brazilian Portuguese.

PRACTICE AREAS

Consumer Fraud
Securities Fraud
Shareholder Derivative

EDUCATION

- DePaul University College of Law, J.D., 2010
- Lynn University, B.S., Business, 2006

ADMISSIONS

Florida
United States District Courts for the Middle and Southern Districts of Florida
United States District Court for the Eastern District of Michigan
United States District Court for the Southern District of Texas

HONORS & AWARDS

Rising Star, *Super Lawyers Magazine*, 2019

Exhibit R

DAVID RANDOLPH SMITH

DAVID RANDOLPH SMITH & ASSOCIATES
1913 21st Avenue South
Nashville, Tennessee 37212 (615)-742-1775

<http://www.drslawfirm.com>

drs@drslawfirm.com



Education & Academic Awards:

Harvard University (B.A., *cum laude*, 1975)

Rhodes Scholar finalist (1975) (District 14, (Alaska, Idaho, Montana, Oregon, Washington))

University of Texas School of Law (J.D., with honors, 1978)

Order of the Coif, University of Texas School of Law (1978)

Texas Law Review, 1977-1978.

Experience

David Randolph Smith has been a trial attorney for 40+ years and was a professor of law at Vanderbilt Law School (1983-1988) teaching torts, evidence and professional responsibility. [He testified in the 100th Congress](#) as an expert witness on products liability law. In 2006 he obtained a record \$7.2 million verdict in a wrongful death case in Warren County, Tennessee, affirmed on appeal for a [\\$10.7 million judgment](#). In 2014 he served as plaintiffs' counsel against pharmaceutical company Endo Health Solutions who agreed [to pay \\$193 million to settle a qui tam case](#). He served as lead plaintiffs' counsel in the Tri-State Crematory class action litigation against fifty-six funeral homes and Georgia Farm Bureau insurance company ([\\$80 million judgment](#)) and represented class members who received [\\$39.5 million](#) in settlements from the funeral homes. He was the lead liaison plaintiffs' attorney for in the NHC fire litigation where [nineteen people lost their lives](#) and resulted in a significant confidential settlement.

He has been recognized by his peers as one of the Best Lawyers in America in Personal Injury Litigation and as one of the Best Lawyers in Tennessee by Business Tennessee, a statewide business journal, in the 2004/forward editions. Smith has also been named a Mid-South "Super Lawyer" (2007-20). The Business Tennessee Best Lawyers List described Smith as "An all-star across the state." The list identified attorneys from all regions of the state and recognized Smith as one of seven "best lawyers" in Tennessee.

He has tried over 100 cases in state and federal courts throughout the nation, in Tennessee, Texas, Missouri, Alabama, Arizona, Georgia, Kentucky, Indiana, Mississippi, Florida, Ohio, South Carolina, Virginia, Montana, Pennsylvania, Minnesota and Washington D.C. He began in private practice with the national law firm of BAKER & BOTTS in Houston, Texas (1978-1983) representing defendants and insurance companies. He then became an Associate Professor of Law teaching Torts, Evidence and Professional Responsibility at Vanderbilt University School of Law (1983-1988). Smith has been evaluated by his peers and received an “AV” rating by Martindale-Hubbell—the highest rating possible—indicating Very High to Preeminent Legal Ability (A) and a Very High general ethical standards rating. (V).

Smith has served as lead Plaintiffs’ counsel in a number of significant cases including: The Tri-State Crematory Class Action Litigation, The NHC Nursing Home Fire Litigation, and the Paducah Gaseous Diffusion Plant Litigation (a mass action suit for radiation damage to real property).

Smith also presented expert testimony to the landmark Presidential Commission on the Human Immunodeficiency Virus Epidemic, Hearings on Discrimination, Ethics and Testing, Vanderbilt University, Nashville, TN, March 16-18, 1988. In his testimony Smith advocated federal laws to protect privacy in testing and to outlaw discrimination of persons with HIV/AIDS. Of interest, the opposing expert view was presented at this panel by then federal judge Kenneth W. Starr (later Independent Counsel on the Whitewater matter).

Certifications

Smith has been certified as a Civil Litigation Specialist, and as a Specialist in Civil Pre-Trial Practice by the National Board of Trial Advocacy. He has also been certified as Medical Malpractice Specialist by the American Board of Professional Liability Attorneys and the Tennessee Commission on Continuing Legal Education and Specialization.

Admissions

Texas (1978); Tennessee (1986); U.S. District Courts (Middle, Eastern Districts of Tennessee; Southern District of Texas; Western District of Michigan); Courts of Appeals (Fifth Circuit; Sixth Circuit); U.S. Supreme Court; U.S. Claims Court.

Professional Activities

- ✎ Research Scholar, Vanderbilt University Medical Center for Clinical and Research Ethics, 1986-1988.
- ✎ Member, Executive Committee, Vanderbilt University AIDS Project, 1987-1988.
- ✎ Member: Nashville, Tennessee and American (Commentator, Law and Medicine Committee, Tort and Insurance Practice Section) Bar Associations;
- ✎ Civil Justice Reform Act Advisory Committee.
- ✎ The Association of Trial Lawyers of America/AAJ (Sustaining Member, Amicus Curiae Committee, Consultant, Member, Constitutional Challenge Committee)
- ✎ Smith has served as an expert witness on professional responsibility on behalf of the Tennessee Board of Professional Responsibility and has testified as an expert witness on tort law, insurance coverage and the standard of care in legal malpractice actions.

Exhibit S



Morgan & Morgan is a leading civil trial law firm representing consumers and commercial clients nationwide. With over 500 lawyers, and more than 2,000 non-lawyer employees, Morgan & Morgan is the largest plaintiffs' firm in the state of Florida and one of the largest if not the largest in the nation. Morgan & Morgan maintains over 50 offices in multiple states including Alabama, Arkansas, California, Florida, Georgia, Indiana, Illinois, Kentucky, Massachusetts, Michigan, Mississippi, New York, Pennsylvania, and Tennessee. Morgan & Morgan has a dedicated Complex Litigation Group staffed with lawyers, paralegals, and retired FBI agents serving as investigators committed to representing consumers in complex litigation, MDL proceedings and class action cases throughout the country.

Jean Sutton Martin. For more than 20 years, Ms. Martin has concentrated her practice on complex litigation, including consumer protection and defective products class action. She has a unique background having handled individual personal injury and mass tort cases as well as managing large consumer class actions.

Ms. Martin presently serves as a member of the Plaintiffs' Steering Committee and bellwether trial team in *In re: Smith & Nephew Birmingham Hip Resurfacing (BHR) Hip Implant Products Liability Litigation*, No. 17-md-2775 (D. Md.) and as interim co-lead counsel in *In re Brinker Data Incident Litigation*, No. 18-cv-686 (M.D. Fla.). She has served in leadership positions in many consumer class actions and consolidated proceedings in federal courts around the country, including *inter alia*: *Gordon, et al. v. Chipotle Mexican Grill, Inc.*, No. 17-cv-01415 (D. Colo.) (data breach) (co-lead counsel); *Linnins v. HAECO Americas, Inc., et al.*, No. 16-cv-486 (M.D.N.C.) (employee data disclosure) (co-lead counsel); *Torres v. Wendy's International, LLC*, No. 6:16-cv-210 (M.D. Fla.) (data breach) (class counsel); *Fuentes, et al. v. UniRush, LLC, et al.*, No. 1:15-cv-08372 (S.D.N.Y.) (disruption in servicing of financial accounts) (co-lead counsel); *Lewis, et al., v. Green Dot Corp., et al.*, No. 2:16-cv-03557 (C.D. Cal.) (disruption in servicing of financial accounts) (class counsel); *Brady, et al. v. Due North Holdings, LLC, et al.*, No. 1:17-cv-01313 (S.D. Ind.) (employee data disclosure) (class counsel); *Foreman v. Solera Holdings, Inc.*, No. 6:17-cv-02002 (M.D. Fla.) (employee data disclosure) (class counsel); *In Re: Outer Banks Power Outage Litigation*, No. 4:17-cv-141 (E.D.N.C.) (extended island power outage due to defective construction practices) (class counsel); and, *McCoy v. North State Aviation, LLC, et al.*, No. 17-cv-346 (M.D.N.C.) (WARN Act violations) (class counsel).

In 2016, Ms. Martin was selected by her peers as the top Litigation attorney in the State of North Carolina for *Business North Carolina Magazine's Legal Elite*, gaining membership in the *Legal Elite* Hall of Fame. Since 2012, she has been selected to the Super Lawyers list for North Carolina in the areas of mass torts and class actions, with selection to the Top 50 Women North Carolina list since 2014.

Ms. Martin has been honored with the prestigious "AV" rating by Martindale-Hubbell. In 2015, she was inducted as a Fellow of the Litigation Counsel of America, a prestigious trial lawyer honorary society comprised of less than one-half of one percent of American lawyers. For upholding the highest principles of the legal profession and for outstanding dedication to the welfare of others, Ms. Martin has also been selected as a Fellow of the American Bar Foundation, an honorary legal organization whose membership is limited to one third of one percent of lawyers in each state.

Ms. Martin received her Juris Doctor degree from Wake Forest University School of Law, where she served as Editor-in-Chief of the *Wake Forest Law Review* and a member of Moot Court. She obtained eDiscovery certification from the eDiscovery Training Academy at Georgetown Law Center in 2017. Ms. Martin graduated from Wake Forest University with a Bachelor of Science in Mathematical Economics and earned a Master of International Business from the University of South Carolina.

Prior to her legal career, she worked in Munich, Germany on the finance team of a global computer company focusing on the company's expansion into the Eastern European market after the fall of the Berlin wall. Ms. Martin also worked as a marketing manager for an international candy manufacturer where her responsibilities included product development, brand licensing, market research, and sales analysis.

Ms. Martin is a member of the North Carolina bar. She is also admitted to practice before the United States Supreme Court, the United States Court of Federal Claims, the United States Court of Appeals for the Fourth Circuit, and the Western, Middle, and Eastern Districts of North Carolina.

Exhibit T

Moze Cowper has spent the last nineteen years developing a deep understanding of complex litigation. He has been recognized “as one of the most innovative attorneys in the United States” by Law360 for his work at the intersection of litigation and technology. In 2012, he was recognized by the Association of Corporate Counsel as a rising star under the age of forty. In 2017, he was recognized by the highly regarded *Chambers USA* for his work on litigation and e-discovery. In 2019, Moze was inducted into The National Trial Lawyers “Top 100.”

Prior to establishing his own firm, he spent over ten years at the largest biotech company in the world where he managed the products liability, consumer fraud, securities and derivative litigation for the entire company. As an in-house attorney, he acquired a broad understanding of the science and development of large and small molecules, clinical trials, drug labeling, safety reporting, and the FDA. Put simply, he understands pharmaceuticals, medical devices, and bet-the-company litigation.

As a young litigator at Drinker Biddle & Reath, he focused his practice on product liability and class actions. As a law clerk to the Honorable Marina Corodemus in New Jersey Superior Court’s mass tort division, he worked on the national diet drug class action, the national breast implant litigation, the national defective tire litigation, the tobacco litigation, and numerous drug and medical device class actions.

He has authored numerous articles on litigation, e-discovery, international e-discovery, and privacy. He is also a frequent lecturer on the Federal Rules of Civil Procedure and e-discovery. He has served on the faculty of Georgetown Law School’s Advanced E-Discovery Institute and recently joined the faculty of a joint project between EDI and Duke Law School. He is a member of The Sedona Conference® Working Group 1 on Electronic Document Retention and Production and Working Group 6 on International Electronic Information Management, Discovery and Disclosure.

Mr. Cowper currently sits on the Plaintiff Steering Committee (“PSC”) in the Essure litigation before Judge Padova in the Eastern District of Pennsylvania as well as the Plaintiff Steering Committee in the Argon/Rex IVC litigation which is consolidated in front of Judge New in the Philadelphia Court of Common Pleas.

Mr. Cowper has spent his life giving back to his community. He has taught constitutional law to inner city kids through the Constitutional Rights Foundation. He has served as a volunteer attorney for The Public Counsel Law Center in Los Angeles representing an individual in U.S. Immigration Court. He co-founded and developed a charitable organization called City to the Sea in order to get inner city kids interested in triathlon. From 2013-2016, he served as a Board Member for LA’s BEST – a nationally recognized after school enrichment program run out of the Los Angeles Mayor’s office. In 2019, Moze became a Board member of Venice Arts — a non-profit organization focused on arts education in underserved communities in Los Angeles.

Education

Rutgers University School of Law (Camden)

J.D. 2000

Articles Editor Rutgers Law Journal

Finalist Moot Court

Semi-Finalist Advanced International Moot Court

The University of New Hampshire

B.A. 1997 – History

Phi Beta Kappa

Publications

“Hot Topics: Federalism, Privacy, and Discovery,” DRI Seminar Series, Drug & Medical Device Litigation, San Francisco, CA 2002 (Vol. 12, No. 6).

“International E-Discovery: The Recent French Supreme Court Decision and Its Implications on Conducting Discovery Abroad,” co-authored with Amor Esteban, ABA’s In-House Litigator.

“Not Your Mother’s Rule 26(f) Conference,” co-authored with John Rosenthal, Vol. 8, Fall 2007, The Sedona Conference Journal.

THE SEDONA FRAMEWORK FOR ANALYSIS OF CROSS-BORDER DISCOVERY CONFLICTS: A Practical Guide to Navigating the Competing Currents of International Data Privacy and E-Discovery, Senior Editor and Drafter, 2008.

“E-Discovery, Privacy, and the Transfer of Data Across Borders: Proposed Solutions for Cutting the Gordian Knot,” co-authored with Amor Esteban, Vol. 10, Fall 2009, The Sedona Conference Journal.

THE SEDONA CONFERENCE’S INTERNATIONAL PRINCIPLES ON DISCOVERY/DISCLOSURE AND PRIVACY, Senior Editor, The Sedona Conference Journal

Presentations, Speaking, and Faculty Appointments

Pharmaceutical Litigation for In-House Lawyers: ABA Corporate Counsel Annual Meeting, Carlsbad, California (2006)

Cross Border Litigation and Conflict of Laws, Panel Member and Speaker, Madrid, Spain (2006)

Pharmaceutical and Biotech Litigation: Panel Member and Speaker, Philadelphia, Pennsylvania (2006)

Sedona Conference: Getting Ahead of the E-Discovery Curve, Faculty Member and Speaker, Memphis, Tennessee (2007)

Cross Border Litigation and Privacy, Faculty Member and Speaker, Bermuda (2007)

International E-Discovery and Multi-National Corporations, Legal Tech Conference, Speaker and Panel Member, New York City, New York (2008)

International Cross Border Conflicts and Privacy, Faculty Member and Speaker, Barcelona, Spain (June 2009)

Mass Tort Conference: Drug and Medical Devices, Panel Member and Speaker, Philadelphia, PA (June 2012)

Chief Privacy Officer Roundtable, Faculty Member and Moderator, Toronto, Canada (June 2012)

EDI’s Annual Meeting: Chairperson and Speaker, Ethics and E-Discovery (Santa Monica, California, October 2013)

Georgetown Law: Advance e-Discovery Institute: Moderator for Panel on Recent Changes to the Federal Rules of Civil Procedure (November 2015)

Georgetown Law: Advance e-Discovery Institute: Speaker and Panel Member with Magistrate Judge Craig Shaffer and Judge Joy Conti on taxable costs under the Federal Rules of Civil Procedure (November 2016)

IVC Filters: Understanding the Science, Speaker (CAMG Webinar 2017)

Harris Martin: Allergan Textured Breast Implants: The Science and the Law, Speaker (Laguna Beach, CA 2019)

Licenses

Mr. Cowper is admitted in California, New Jersey, Texas, and Washington D.C. He is admitted before the United States District Court for the Central District of California, the Northern District of California, the Southern District of California, the District of New Jersey, the Eastern and Western Districts of Texas, the Eastern and Southern Districts of New York, the D.C. Court of Appeals, the United States Court of Appeals for the 9th Circuit, and the United States Supreme Court.

Exhibit U

KOHN, SWIFT & GRAF, P.C.

Since its founding in 1969, the firm of Kohn, Swift & Graf, P.C., has been a national leader in the prosecution of class actions and other complex commercial litigation. Kohn, Swift & Graf, P.C. and its attorneys have been selected by courts and co-counsel to be lead counsel, or members of the executive committee of counsel, in scores of class actions throughout the country in the antitrust, securities fraud, tort and consumer protection fields.

The firm and its shareholders have been recognized for their excellence in antitrust, business and human rights litigation by numerous publications, including the Best Lawyers in America, Chambers USA America's Leading Business Lawyers and Pennsylvania Super Lawyers.

Mr. Shub is recognized as one of the nation's leading consumer rights lawyers and has served in leadership roles in numerous federal and state class action cases over the past three decades. He has extensive experience representing classes against well-known manufacturers of all types of consumer products ranging from automobiles to air conditioning systems. He gained notable attention in the area of defective consumer electronics and computer hardware as a result of many cases against companies such as Hewlett-Packard, Maytag, IBM and Palm. In fact, Maximum PC, a leading computer product magazine, remarked that, "Shub is becoming renowned for orchestrating suits that have simultaneously benefited consumers and exposed buggy hardware."

Mr. Shub's accomplishments include:

Serving as co-lead trial counsel in a class action case against a large Pennsylvania County that resulted in an aggregate jury award of \$68,000,000 on behalf of 68,000 individuals; serves as lead counsel in Pennsylvania against KIWI Energy LLP for deceptive advertising of residential energy practices; serves as co-lead counsel in Illinois against Direct Energy for deceptive advertising of residential energy practices; served as co-lead counsel in Pennsylvania against PG&E for deceptive advertising of residential energy practices; served as co-lead counsel in settled national litigation against CPG International for deceptive advertising in connections with deceptive advertising of AZEK-branded decking products.

BAR ADMISSIONS

Supreme Court of Pennsylvania
District of Columbia
Supreme Court of California
New York Supreme Court, Appellate Division, Third Department
Colorado

U.S. District Courts of the:

- * Eastern District of Pennsylvania
- * Eastern District of Michigan
- * Northern District of California
- * Central District of California
- * Southern District of California
- * District of Colorado

MEMBERSHIPS AND ASSOCIATIONS

American Association of Justice
American Bar Association
Consumer Attorneys of California

HONORS AND AWARDS

Pennsylvania Super Lawyer, 2005-2014
Articles Editor, Law Review, Delaware Journal of Corporate Law, 1987-88

Exhibit V

Nathan Bess is a partner with Aylstock, Witkin, Kreis & Overholtz, PLLC. He was a Wilkins Scholar at the University of the South in Sewanee, Tennessee, where he earned his Bachelor of Arts in Economics. He received his law degree from the Levin College of Law at the University of Florida, where he also completed a certificate in Environmental and Land Use Law.

Mr. Bess practices in the areas of Pharmaceutical Mass Torts, Defective Device Mass Torts, and other complex litigation. He has been involved in all aspects of pharmaceutical and medical device litigation, including multidistrict litigation regarding Actos, Hormone Replacement Therapy, Transvaginal Mesh, Trasyolol, Paxil, Yaz, Pradaxa, the BP Oil Spill, Power Morcellators, Xarelto, Proton Pump Inhibitors, and other defective drugs or devices. Mr. Bess also leads the Environmental Law and Toxic Torts practice at the firm and has experience in toxic torts involving groundwater, soil, and dust contamination. He has also served as a member or participated in various committees in mass tort litigation, including discovery, science, electronically stored information, and foreign language committees. Mr. Bess has also been a member of trial teams in both bellwether and remand cases in mass tort litigation.

While in law school, Mr. Bess served as a Teaching Assistant (Legal Research and Writing, Appellate Advocacy), Election Commissioner, member of the Honor Committee, Moderator and Speakers Chair for the Public Interest Environmental Conference, Local Chair for the Annual Conference of the National Association of Environmental Law Societies, Vice-President of the Environmental and Land Use Law Society, and was a member of Phi Delta Phi, a legal honor society. He was also a member of the American Law and Economics Society. Additionally, Mr. Bess was a founding member of the Florida Journal of Ecology and Environmental Law, for which he served as Articles Editor. Also during law school, Mr. Bess clerked for several law firms practicing class action toxic torts and public interest environmental law.

Mr. Bess has served as a member of the Community Investment Committee of the U.S. Environmental Protection Agency Brownfields Cleanup Revolving Loan Fund. He has also been a faculty member for Sterling Education Services on the topic of green issues in landlord-tenant law.

He is licensed to practice before all Florida state and federal courts and the U.S. District Courts for the Western District of Tennessee and the Eastern District of Wisconsin. He is a member of the American Bar Association (and the Section on Environment, Energy, and Resources), the Florida Bar Association, the Escambia-Santa Rosa Bar Association, the American Association for Justice, the Florida Justice Association, and the First Circuit Justice Association.

Exhibit W

Dena Young is an Associate at the law firm of Ross Feller Casey. She focuses her practice on medical malpractice, pharmaceutical and products liability litigation. She currently represents hundreds of women diagnosed with ovarian cancer from their use of talcum powder, and people diagnosed with non-Hodgkin's lymphoma from their exposure to Roundup. She has been involved in a variety of consolidated mass tort and multi-district litigations including In Re Xarelto Products Liability Litigation MDL No. 2592, Xarelto Case No, 2349 in Philadelphia, In Re Roundup Products Liability Litigation MDL 2741, and In re Johnson & Johnson Products Liability Litigation MDL No. 2738.

Before joining Ross Feller Casey in 2015, Young worked for personal injury law firms where she 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. Young also represented clients injured by drugs and medical devices, including transvaginal mesh, Risperdal, Viagra, Zofran, and Xarelto.

Young earned her J.D. from Drexel University's Earle Mack School of Law, *cum laude*, and is a class of 2010 representative of the school's Alumni Council. Young earned her bachelor's degree from The George Washington University where she graduated *cum laude*.

Young is a board member of The Kaiserman JCC. She is an active member of the American Association for Justice, the Pennsylvania Association for Justice, and of the Future Leaders Committee of the Philadelphia Trial Lawyers Association.

She has lectured and served on panels regarding medical device cases for several organizations, including Mass Torts Made Perfect, HarrisMartin, New Jersey Association for Justice, and Pennsylvania Association for Justice.

Young is licensed to practice law in Pennsylvania and New Jersey. She is admitted to practice in the U.S. District Court for the Eastern District of Pennsylvania, and the U.S. District Court for the District of New Jersey. She has also appeared in other jurisdictions in a *pro hac vice* capacity.

Exhibit X



Rachel Soffin. Rachel Soffin is a Senior Attorney at Greg Coleman Law PC, an AV rated, full-service law firm specializing in consumer class action and mass tort litigation. For the last decade, Ms. Soffin's practice has been exclusively dedicated to consumer class action litigation. Ms. Soffin has successfully represented consumers in numerous class action cases involving a wide range of subjects affecting consumers, including product defects, racial discrimination, deceptive trade practices, and statutory violations: *Berman et al v. General Motors LLC*, No. 2:18-cv-14371-RLR (S.D. Fla.) (\$40 million value settlement for consumers whose vehicles experienced excessive oil consumption and resulting damages); *Price et. al v. L'Oréal USA, Inc. et al*, No. 1:17-cv-00614 (S.D.N.Y.) (certified class action for alleged deceptive conduct involving labeling of hair care products); *De Leon v. Bank of America, N.A.* (USA), No. 6:09-cv-01251-JA-KRS (M.D. Fla.), (\$10 million settlement for consumers subjected to violations of the Fair Credit Billing Act, a breach of their Cardholder Agreement and deceptive trade practices); *Swift v. Bank of America*, No. 3:14-cv-01539 (M.D. Fla) (\$1 million settlement for consumers subjected to TCPA violations); *In re: Horizon Organic Milk Plus DHA Omega-3 Marketing and Sales Practice Litigation*, 1:12-MD-02324-JAL (S.D. Fla.) (\$1.3 million settlement value for consumers subjected to deceptive trade practices for misrepresentations regarding a milk product); *In re: Tracfone Unlimited Service Plan Litigation*, No. 13-cv-03440-EMC (N.D. Cal) (\$40 million settlement for consumers subjected to deceptive cellular phone data plan practices); *In re Black Farmers Discrimination Litigation*, No 08-ML-0511 (D.D.C.) (\$1.2 billion settlement for farmers subjected to discrimination by the USDA).

In addition to prosecuting the above class actions, in 2010, Ms. Soffin successfully defended now United States Senator Charlie Crist in a class action brought against him by individuals who sought a refund of their contributions to Crist's U.S. Senate Campaign because he changed political parties during his campaign. See *Linda A. Morton and John D. Rood v. Charlie Crist, Individually, and The Charlie Crist for U.S. Senate Campaign*, No. 10-2846-CA (Fla. 20th Cir. Ct. 2010).

Ms. Soffin obtained her undergraduate degree in Finance, with honors, from The Florida State University. While in college, Ms. Soffin worked at the Florida Legislature for three sessions, where she worked closely with government leaders. Ms. Soffin earned her law degree from Stetson University College of Law, cum laude, where she served as a Digest Writer on the Stetson Law Review, in which her work was regularly published. Ms. Soffin is currently a member in good standing of The Florida Bar and the State Bar of Georgia, and of all the bars to which she has been admitted, including the United States Court of Appeals for the Eleventh Circuit, the Middle District of Florida, Southern District of Florida, the Northern District of Georgia and the Northern District of Illinois. In addition, Ms. Soffin has been recognized by Super Lawyers as a Florida Rising Star (2011-2013) and a Florida Super Lawyer (2014-2018).

Exhibit Y

TIASHA PALIKOVIC, SHAREHOLDER AND PARTNER, WITTELS
LAW, P.C.

Tiasha Palikovic is a Shareholder and Partner at Wittels Law, P.C., where she represents individuals in class and collective actions involving consumer protection, personal injury, wage and hour, and discrimination claims.

Ms. Palikovic has over a decade of in-depth experience with all aspects of complex litigation at the trial and appellate level, including pleadings, discovery, class certification, dispositive motions, trials, and settlement. She has represented clients in a broad range of civil litigation matters in state and federal courts, including disputes involving consumer fraud, intellectual property, securities, and contract claims. Ms. Palikovic also has substantial experience representing pro bono clients in asylum proceedings.

Since joining Wittels Law, Ms. Palikovic has been appointed plaintiffs' lead counsel in numerous consumer and employee class and collective actions. Most recently, Ms. Palikovic served as co-lead counsel in the *Delgado v. Ocwen Loan Servicing, LLC* consumer fraud and RICO class action. After significant discovery, including 35 court conferences, 30 contested discovery motions, 75-plus document dumps amounting to more than 400,000 pages of material, 20-plus depositions, and five subpoenas, her firm obtained a \$39,800,000 class-wide settlement on behalf of consumers who were unwittingly enrolled in expensive monthly home warranty and service plans via deceptive check solicitations.

Ms. Palikovic began her legal career as an associate in the New York office of Mayer Brown LLP, where she practiced complex business litigation. She also served as Outside Counsel for the Sierra Club, and as a law clerk at the International Criminal Tribunal for the Former Yugoslavia. Ms. Palikovic is admitted to the New York Bar and the Federal Courts for the Southern and Eastern Districts of New York, and the U.S. Court of Appeals for the Second Circuit.

Ms. Palikovic received her law degree from the New York University School of Law, where she was a Dean's Scholar, an NYU International Law and Human Rights Fellow, and Notes Editor of the NYU Journal of Law & Business. She graduated with High Distinction from the University of California at Berkeley, and received her Master's Degree, with High Honors, from the London School of Economics. A first-generation American, Ms. Palikovic is fluent in Croatian/Serbian/Bosnian and speaks French and Italian.