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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

VALERIA MERCADO and ANDREA
KRISTYANNE HOLMES, individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF
AMERICA, INC. d/b/a/ AUDI OF
AMERICA, INC.,

Defendants.

Case No. 5:18-cv-02388-JWH-SP

**DECLARATION OF ALEX R. STRAUS IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES
AND EXPENSES AND FOR SERVICE PAYMENTS**

I, ALEX R. STRAUS, hereby declare as follows:

1. I am counsel for Plaintiff Valeria Mercado and Plaintiff Andrea Kristyanne Holmes (collectively, "Plaintiffs") in this action. I make this Declaration in Support of Plaintiffs' Motion for Attorneys' Fees and Expenses and for Service Payments.

2. I have actively participated in the conduct of this litigation, have personal knowledge of the matters set forth herein, and if called to testify, could and would testify competently thereto.

3. Two of the firms that brought this action in November 2018, Greg Coleman Law, PC ("GCL"), and Whitfield Bryson, LLP ("WB"), effectuated a merger after the

1 Settlement Agreement was executed in May 2021, thereby becoming Milberg Coleman
2 Bryson Phillips Grossman, PLLC (“Milberg”).

3 4. My firm, Milberg Coleman Bryson Phillips Grossman, PLLC and Ahdoot
4 Wolfson PC (collectively, “Class Counsel”) have litigated this case, have extensive
5 experience in litigating complex class actions across the country, including extensive
6 experiences in litigating consumer fraud and defective product cases. Attached hereto as
7 **Exhibits A through C** are the resumes of GCL, WB, and Milberg, respectively.

8 5. Class Counsel committed an enormous amount of time, effort, and resources
9 to achieve an exceptional result in the face of Defendant’s relentless opposition over more
10 than four years of litigation. Plaintiffs faced five motions to dismiss (ECF 15, 54, 81-85,
11 100, 115), two of which were fully briefed with live oral arguments, during which Class
12 Counsel skillfully succeeded in maintaining multiple causes of action. Defendant
13 remained steadfast in its position that the vehicles were not defective and were properly
14 designed, manufactured, marketed, and sold. Class Counsel had cause for concern as
15 Defendant successfully challenged several of Plaintiffs’ claims and would have put forth
16 strong opposition to class certification and at trial. If Class Counsel had not secured this
17 settlement, Class Members faced a significant risk of losing millions of dollars in
18 unreimbursed out-of-pocket expenses, in addition to losing the benefit of the extended
19 warranty made available under the terms of the Settlement. By contrast, the Settlement
20 achieved by Class Counsel compensates thousands of Class Members up to 100% of their
21 out-of-pocket costs and provided an extended warranty to address the alleged Defect to
22 Class Members since the Settlement’s Notice Date.

23 6. In the sections that follow, Class Counsel explains the hard-fought litigation
24 that resulted in the Settlement Agreement and justify the fair and reasonable attorneys’
25 fees, expenses, and service payments requested.

LITIGATION SUMMARY

7. Plaintiff Valeria Mercado filed the initial complaint in this Action against Defendant on November 9, 2018, asserting claims alleging front brake noise in certain Audi Q7 vehicles. (ECF 1.) The original complaint set forth claims for: (1) violation of the Consumer Legal Remedies Act, California Civil Code § 1750, *et seq.* (“CLRA”); (2) violation of the California Unfair Competition Law, California Business & Professions Code § 17200, *et seq.* (“UCL”); (3) negligence; (4) product liability – design defect; (5) violation of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301, *et seq.*; (6) Violation of the Song-Beverly Consumer Warranty Act, California Civil Code § 1790, *et seq.* (“Song-Beverly Act”); and (7) violations of other states’ statutes prohibiting unfair and deceptive acts and practices. (ECF 1.)

8. Defendant’s first motion to dismiss was filed on January 4, 2019 (ECF 15). Class Counsel engaged with Defendants in excess of their statutory meet-and-confer requirements in an effort to narrow the issues for the Court’s consideration. Plaintiff Mercado then filed a First Amended Complaint (ECF 53) in response to several of the issues raised by Defendant. Defendant moved to dismiss again on March 15, 2019, and Plaintiffs again attempted to narrow the issues presented to the Court by filing the Second Amended Complaint. (ECF 79.) Defendant’s third motion to dismiss was fully briefed by both Parties (ECF 81-87), and oral argument was heard on July 15, 2019. On November 26, 2019, the Court entered an order granting in part and denying in part Defendant’s motion. (ECF 97.) Plaintiffs then filed a Third Amended Complaint in response to the Court’s order. (ECF 98.) Defendant’s fourth motion to dismiss was again fully briefed by both Parties (ECF 100, 106, 109), and oral argument was held on March 2, 2020. On May 15, 2020, the Court entered another order granting in part and denying in part that motion. (ECF 113.)

9. On May 29, 2020, Plaintiffs filed a Fourth Amended Class Action Complaint. (ECF 114.) Informed by the Court’s prior orders, Defendant filed a motion for partial dismissal (ECF 115) in response to which Plaintiffs filed a Statement of Non-

1 Opposition in accordance with which the following claims survived: (1) Plaintiff
2 Holmes' claims for violations of the CLRA and UCL, based on unlawful conduct, unfair
3 conduct, and failure to disclose; and (2) Plaintiff Mercado's claims for violations of the
4 Song-Beverly Act. (ECF 119.)

5 10. On September 28, 2020, the case was transferred from Judge John A.
6 Kronstadt to Judge John W. Holcomb. (ECF 120.) Three months later, in December
7 2020, the Court entered an order granting Defendant's motion to dismiss the Fourth
8 Amended Complaint, dismissing Plaintiff Holmes' CLRA and UCL claims, and both
9 plaintiffs' MMWA claims, with prejudice. (ECF 133.)

10 11. The parties stipulated to Plaintiffs' filing of a Fifth Amended Complaint
11 (ECF 140), which includes Plaintiff Holmes' CLRA and UCL claims and Plaintiff
12 Mercado's Song-Beverly Act claim; as well as a claim for breach of implied warranties.
13 (ECF 147.) The Fifth Amended Complaint alleges that Defendant designed,
14 manufactured, warranted, distributed, imported, marketed, advertised, serviced, sold,
15 and leased Class Vehicles with one or more defects manifesting as a loud, high-pitched
16 squealing noise when the brakes are applied during ordinary and intended use. (*Id.* ¶¶ 4-
17 7, 61.) Defendant continues to deny Plaintiffs' allegations and maintains that the subject
18 vehicles' front brakes are not defective, that no warranties were breached, that no statutes
19 or laws were violated, and no wrongdoing occurred with respect to the subject vehicles
20 and their brakes. The original complaint set forth claims for: (1) violation of the
21 Consumer Legal Remedies Act, California Civil Code § 1750, *et seq.* ("CLRA"); (2)
22 violation of the California Unfair Competition Law, California Business & Professions
23 Code § 17200, *et seq.* ("UCL"); (3) negligence; (4) product liability – design defect; (5)
24 violation of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301, *et seq.*; (6) Violation
25 of the Song-Beverly Consumer Warranty Act, California Civil Code § 1790, *et seq.*
26 ("Song-Beverly Act"); and (7) violations of other states' statutes prohibiting unfair and
27 deceptive acts and practices. (ECF 1.)
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1 12. Class Counsel devoted tireless efforts to achieve these goals, and
2 vigorously litigated the cases for over four years, through an onslaught of legal
3 challenges. Class Counsel conducted significant pre-filing investigations, which
4 included detailed review and evaluation of the facts, including a thorough and exhaustive
5 investigation of issues related to Defendant's representations, advertising, marketing,
6 business practices, engineering decisions, and comprehensive research and analysis of
7 the applicable law.

8 13. Class Counsel interviewed and vetted scores of affected Class Members,
9 with whom they communicated throughout the course of the litigation. In all phases of
10 the litigation, Class Counsel worked to develop a full and complete understanding of the
11 legal issues underlying Plaintiffs' claims and advocate forcefully on behalf of all Class
12 Members.

13 14. The operative complaint, Plaintiff's Fifth Amended Complaint, sets forth
14 claims for violation of the CLRA and UCL, Song-Beverly Act, and breach of implied
15 warranties. (ECF 147.)

16 15. Class Counsel also engaged with automotive and damages experts;
17 analyzed reasonably feasible alternative design options, prepared written discovery;
18 reviewed information and documents produced by Defendants; prepared and served
19 initial disclosures; communicated via phone, video, and email between Class Counsel
20 and defense counsel; coordinated and strategized with co-counsel, regularly
21 communicated with the Plaintiffs and scores of potential class representatives; regularly
22 communicated with Plaintiffs regarding case developments, discovery, settlement and
23 litigation strategy; prepared for and participating in multiple full-day mediation sessions;
24 researched and drafted preliminary approval filings; and worked with the settlement
25 administrator to facilitate the benefits to Class Members achieved through the Settlement
26 Agreement.

27 16. The Parties first discussed a potential settlement shortly after Defendant
28 filed its motion for partial dismissal of the Fourth Amended Complaint in June, 2020. In

1 or around October 2020, the Parties reached certain partial tentative agreements that
2 served to begin the mediation process. On November 10, 2020, following extensive
3 preliminary negotiations, the Parties participated in a full day mediation session under
4 the supervision of Bradly Winters, an experienced, professional third-party mediator at
5 JAMS. The Parties then engaged in arms'-length negotiations through many telephonic
6 discussions, participated in a follow-up session with the mediator on December 11, 2020,
7 and ultimately agreed on the Settlement's principal terms.

8 17. Extensive months-long negotiations ensued, including many telephone
9 discussions, to finalize and memorialize all aspects of the Settlement Agreement,
10 including each of its exhibits. Class Counsel solicited and reviewed multiple bids from
11 well-known settlement administrators, and the Parties ultimately selected Angeion
12 Group ("Angeion") to advise regarding the mechanics of the Settlement, the Notice Plan,
13 and administration of Settlement claims. The Notice Plan and each document comprising
14 the Class Notice were extensively negotiated and exhaustively refined to make them
15 understandable and fully informative.

16 18. After months of negotiations, the Parties executed the Settlement
17 Agreement on May 5, 2021. At all times during settlement discussions, the negotiations
18 were at arms' length.

19 19. On November 1, 2021, the Court preliminarily approved the Settlement and
20 ordered that the Class be given notice. (ECF 167.) The Parties negotiated and filed a
21 stipulation to amend the Court's original order preliminarily approving the Settlement
22 (ECF 168), which the Court granted on November 4, 2021 (ECF 169, the "Preliminary
23 Approval Order"). Following the Preliminary Approval Order, the Parties continued to
24 work with the Settlement Administrator to supervise dissemination of Notice to Class
25 Members, which commenced on February 11, 2022 (the "Notice Date"). These efforts
26 included review and drafting of the language and format of the Settlement Website, the
27 script for the automated response to the toll-free number, the language and format of the
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1 Settlement Class Notice forms, monitoring for exclusion requests and objections, and
2 ensuring prompt response to each Class Member inquiry regarding the Settlement.

3 20. Effective on the Notice Date, Defendant extended its New Vehicle Limited
4 Warranties applicable to the Class Vehicles to cover one (1) repair of a diagnosed
5 condition of squealing of the front brakes, by an authorized Audi dealer, during a period
6 of four years or 48,000 miles (whichever occurs first) from the In-Service Date of the
7 Class Vehicle (hereinafter, the "Extended Warranty"). (Settlement Agreement § II.A.)
8 The Extended Warranty repair consists of replacement of the front brake pads and
9 installation of one new lower spring in each caliper of the front brake so that there are
10 two springs per caliper, in accordance with Technical Service Bulletins 2050735
11 (applicable to model year 2017 Audi Q7 Class Vehicles) and 2050737 (applicable to
12 model year 2018 Audi Q7 Class Vehicles). This warranty, as extended, is fully
13 transferable to subsequent owners or lessees to the extent the extended warranty period
14 (time and/or mileage) has not expired.

15
16 **CLASS COUNSEL**

17 21. Daniel Bryson and Gregory Coleman have over thirty years' experience,
18 have been lead counsel in multiple cases that have been consolidated into multi-district
19 litigation, and have been named as Super Lawyers. Daniel Bryson, Gregory Coleman,
20 and Alex Straus All have considerable class action experience and expertise.

21 22. The hourly rates requested here are comparable to attorneys of similar
22 experience and qualifications within the Central District of California. Class Counsel in
23 this matter have extensive experience litigating and settling class actions, and other
24 complex matters, including cases regarding false advertising, breach of contract, and
25 unlawful and unfair business practice claims on behalf of consumers.

26 23. Gregory Coleman has been named one of the Top 100 Trial Lawyers by the
27 American Trial Lawyers Association, among other awards. Further, as detailed in Class
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1 Counsel's firm resumes, Class Counsel has been named Class Counsel in numerous class
2 action settlements. Alex Straus been practicing law for over 12 years.

3 24. Class Counsel request rates of \$950 for Daniel K. Bryson ("Bryson"), \$950
4 for Gregory F. Coleman ("Coleman"), and \$750 for Alex R. Straus ("Straus"). Other
5 attorneys and staff from GCL, WB, and Milberg contributed to this litigation on behalf
6 of Class Counsel over the course of four years. However, Bryson, Coleman, and Straus
7 performed the large majority of Class Counsel's lodestar hours from these firms.

8 25. Attorneys and staff from GCL, WB, and Milberg worked a combined
9 1,622.8 hours on this case from inception to date yielding a lodestar of \$663,326.15. The
10 law firms of GCL, WB, and Milberg spent a total of \$23,921.95 in costs and expenses.

11 26. Class Counsel spent substantial time investigating and litigating this case,
12 including inter alia: Pre-suit investigation and analysis, interviewing and vetting
13 potential class representatives, engaging with automotive and damages experts,
14 responding to Defendant's five motions to dismiss; presenting Plaintiffs' positions at
15 oral argument, preparing written discovery; reviewing information and documents
16 produced by Defendants; preparing and serving initial disclosures; phone, video, and
17 email communications with defense counsel; coordination and litigation strategy with
18 co-counsel, regularly communicating with the Plaintiffs and scores of potential class
19 representatives; regularly communicating with Plaintiffs regarding case developments,
20 discovery (including preparing for vehicle inspections), settlement and litigation
21 strategy; preparing for and participating in multiple full-day mediation sessions;
22 researching and drafting preliminary approval filings; working with the settlement
23 administrator to design an effective notice program, overseeing the claims process; and
24 working with the settlement administrator to facilitate the benefits to Class Members
25 achieved through the Settlement Agreement.

26 27. Class Counsel's fee request reflects that the case was risky and handled on
27 a contingency basis. Class Counsel litigated this case without any guarantee that they
28 would recover any fees, costs, or time. Further, Class Counsel's work on this case

1 precluded filing other cases. Class Counsel also devoted extensive time to this case while
2 foregoing opportunities to work on other cases.

3 28. All Class Members (whether current or former owners/lessees of Class
4 Vehicles) who paid eligible out-of-pocket expenses (parts, labor and taxes) to repair the
5 Defect alleged within four years and 48,000 miles (whichever occurred first) of the Class
6 Vehicle's In-Service Date, are eligible for reimbursement, and the Claims filed at this
7 relatively early stage in the Claims Period show that this component of the Settlement is
8 very valuable. Class Members who had the work performed at an authorized Audi dealer
9 will receive 100% reimbursement (parts, labor and taxes) and those performed by an
10 outside service provider will receive 50% reimbursement. Defendant also extended its
11 New Vehicle Limited Warranties cover the repair of the Defect alleged from one year or
12 12,000 miles to four years or 48,000 miles (whichever occurs first) from the In-Service
13 Date. This warranty, as extended, is fully transferable to subsequent owners or lessees
14 to the extent the extended warranty period (time and/or mileage) has not expired.

15 29. Plaintiffs' litigation efforts led to an exceptional recovery for the Class.
16 Plaintiffs invested time into this litigation and put their names and reputations on the line
17 to secure benefits to thousands of Settlement Class Members warranting the Court's
18 approval of the requested service award.

19
20 I declare under the penalty of perjury under the laws of the United States of
21 America and the state of California that the foregoing is true and correct.
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1 Executed this 31st day of March, 2022 in Los Angeles, California.

2
3 
4 Alex R. Straus

5 MILBERG COLEMAN BRYSON
6 PHILLIPS GROSSMAN PLLC

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9 Tel: 917-471-1894

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Exhibit A



Firm Resume



MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC (“MILBERG”) IS A LEADING GLOBAL PLAINTIFFS’ FIRM, successfully pioneering and litigating complex litigations in the following practice areas: class actions, antitrust and competition law, securities fraud, consumer protection, cyber security and data breach litigation, financial and insurance litigation, environmental law, securities litigation, and product liability. Our attorneys possess a renowned depth of legal expertise, employ the highest ethical and legal standards, and pride themselves on providing stellar service and achieving extraordinary results for their clients.

Milberg was founded in 1965, taking the lead in landmark cases that have set groundbreaking legal precedents and prompted changes in corporate governance benefiting shareholders and consumers. For more than 50 years, the firm has protected victims’ rights, recovering over \$50 billion in verdicts and settlements. Milberg was one of the first law firms to prosecute class actions in federal courts on behalf of investors and consumers. The firm pioneered this type of litigation and became widely recognized as a leader in defending the rights of victims of corporate and other large-scale wrongdoing.

Milberg has offices in New York, California, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Kentucky, Tennessee and Puerto Rico. Recently, Milberg opened an office in London that serves clients in the European Union. In addition, Milberg has expanded in South America, with primary emphasis in Brazil.

The firm’s reputation has been built by successfully taking on challenging cases across a spectrum of practice areas for the past half-century. From resolving business disputes to proving antitrust conspiracies, Milberg is equipped to handle complex, high-stakes cases at any stage of the litigation process.

The firm’s lawyers have been regularly recognized as leaders in the plaintiffs’ bar by the National Law Journal, Legal 500, Chambers USA, and Super Lawyers, among others.

MILBERG IS COMPRISED OF MORE THAN 80 ATTORNEYS ACROSS THE COUNTRY, THE FOLLOWING OF WHOM ARE CERTAIN REPRESENTATIVES OF THE FIRM WHO HAVE HELD LEADING ROLES IN SUCCESSFUL CONSUMER CLASS ACTIONS, ALONG WITH MILBERG ATTORNEYS WHO ARE LICENSED IN OR PRACTICE IN NEW YORK.

GREG COLEMAN is a managing partner at Milberg and has 30 years of trial and appellate experience. Greg received his B.A. with highest honors and distinction from Jacksonville State University in 1986. He attended The University of Tennessee College of Law, graduating in 1989. In addition to distinguishing himself academically, Greg was a member of the National Trial Moot Court Team, was the recipient of the American Jurisprudence Award for National Trial Team and was listed in Who's Who Among Rising Young Americans. In addition, the College of Law bestowed upon Greg the honor of inclusion into the National Order of Barristers for outstanding oral advocacy and trial skills. Greg's practice focuses on class actions, products liability, medical malpractice, personal injury, complex multi-district litigation, toxic torts, premises liability, ERISA, ERISA class actions, drug and medical device litigation, and workers' compensation. He was co-lead counsel in a defective products case against Electrolux in which he and co-counsel successfully obtained a settlement on behalf of a class of more than one million members regarding defectively manufactured dryers. The settlement resulted in an expected utilization settlement value of over \$35 million. Greg was co-lead counsel in a series of automobile defect class actions against General Motors in Florida, Illinois, and California, in which he and co-counsel successfully obtained a \$42 million settlement on behalf of a class of 1.6 million consumers regarding excessive oil consumption. He was lead trial counsel in an ERISA class action against AK Steel Corporation in which he successfully obtained a \$178.6 million settlement on behalf of a class of over 3,000 retirees of AK Steel's Butler Works Plant in Pennsylvania in 2011.

DANIEL K. BRYSON is a managing partner at Milberg and is one of the nation's most respected and experienced attorneys in the area of consumer class actions and mass torts. Dan also has significant experience working with attorneys, funders, and other partners on international litigation projects in the Courts in Amsterdam, the United Kingdom, Belgium, France, Spain and Portugal, among others. For over 32 years, Dan has focused his practice on complex civil litigation, successfully representing thousands of consumers in a wide variety of defective product suits, class actions, and various mass torts and recovering more than \$1.25 billion for his clients in numerous states throughout the country. He frequently collaborates with other attorneys in order to assemble the most effective team possible. Dan has been lead or co-lead counsel in numerous national class actions and MDLs. Dan is a frequent lecturer and writer on a variety of consumer class action, insurance, and mass tort related disputes. He has been quoted by a variety of media outlets over the years including the Wall Street Journal, Washington Post, New York Times, Law360, and Lawyers Weekly to name a few. He has been named as a member of the Legal Elite and Super Lawyers in North Carolina on numerous occasions. He has been awarded the designation of one of the Top 25 lawyers in Raleigh by Charlotte Magazine for a number of years including 2020. Dan is current serving as President of Public Justice, a nationwide public interest law firm. Dan is also an adjunct professor at Campbell Law School in Raleigh, NC where he teaches "Introduction to Class Actions and Multi-district litigation."

R. GLENN PHILLIPS is a managing partner at Milberg and has been practicing law since 1984 and has tried more than 100 civil jury trials. He is a managing partner at Milberg, and director of the firm's global operations. Mr. Phillips has received the highest rating from Martindale-Hubbell (5.0 out of 5.0) and is an AV rated attorney. Mr. Phillips started his legal career representing insureds on behalf of insurance companies, handling primarily wrongful death and product liability cases. In the mid-1990s, he began representing those injured by others, corporations, or by defective drugs and devices. Since then, he has been actively involved in the aggregation and prosecution of large groups of individual clients injured by corporate neglect. Mr. Phillips is a firm believer in the phrase, "leveling the playing field," allowing ordinary citizens to have access to justice through the courts and to being guided by experienced, aggressive, and ethical counsel. Mr. Phillips is a member of the Washington state bar. He is also a member of the American Association for Justice, an Eagle member of the Washington Association for Justice, and the non-profit organization, Public Justice. He is a frequent speaker before such national groups as The National Trial Lawyers, American Association for Justice, and Mass Torts Made Perfect, as well as various state trial lawyer groups.

MARC D. GROSSMAN is a managing partner at Milberg. Since beginning his law career in 1993, Mr. Grossman has focused primarily on representing large groups of plaintiffs against common defendants. In 1999, after six years of practicing plaintiff's personal injury law in state and federal courts in New York and New Jersey, Mr. Grossman founded the law firm of Sanders and Grossman, P.C. specifically to pursue claims on behalf of medical providers. This firm, and its successors, grew dramatically under his leadership, and now represent thousands of medical providers litigating claims against insurance companies, and thousands of injury victims.

Mr. Grossman had a vision of uniting the medical profession by affording them the opportunity to litigate nominal claims that were being written off by medical providers as uncollectible and had not previously been practical for most attorneys to litigate. By coordinating discovery, utilizing the most up-to-date case management technology, and recruiting top office administrators and trial attorneys, Mr. Grossman's firm was able to greatly improve efficiencies throughout the litigation process and ultimately the viability of collecting these claims. By filing over 100,000 individual lawsuits, Mr. Grossman's firms garnered the attention of the insurance industry and the medical profession in New York eventually leading to a series of mass settlements on behalf of his clients and recoveries in the hundreds of millions of dollars. In just 2006 and 2007, Mr. Grossman's firm personally litigated, negotiated, and recovered over 100 million dollars for his medical provider clients. The unique experience Mr. Grossman garnered as an innovator and leader in the mass settlement of medical claims and mass torts made him a leader in his field in negotiating and obtaining large recoveries.

Most recently, Mr. Grossman has represented hundreds of injured clients in lead paint litigations, asbestos litigations, mold litigations, and thousands of victims of defective drugs and products. Mr. Grossman received recognition litigating Vioxx cases in New Jersey Superior Court where he served as a liaison to the media as a member of the Vioxx Plaintiffs' Steering Committee's ("PSC's") Public Relations Committee, and as a liaison for the Committee to many financial institutions and governmental agencies, offering a common voice for the hundreds of attorneys handling such cases and the tens of thousands of victims they represent. These efforts and the hard work of many other relentless attorneys ultimately led Merck to agree to one of the largest Civil Settlements in American History for \$4.85 Billion.

In December 2010, Mr. Grossman was nominated and invited to join both The Board of Directors of the New York State Trial Lawyers Association and the Executive Committee of Association of Trial Lawyers of America. Mr. Grossman is also a member of the Mass Tort Trial Lawyers Association and the Leaders Forum of the American Association of Justice.

Mr. Grossman has actively litigated for other large groups of plaintiffs in the following matters: *In re Avandia Mktg., Sales Practices and Prods. Liab. Litig.*; *In re N.Y. Bextra and Celebrex Prod. Liab. Litig.* in New York's Supreme Court, New York County; Case No. 273, *In re Bextra and Celebrex Litig.*, Superior Court of New Jersey, Atlantic County; Oxycontin Litigation in New York's Supreme Court, Richmond County; MDL-1708, *In re Guidant Corp. Implantable Defibrillators Prods. Liab. Litig.* in Minnesota; MDL-1699, *In re Bextra and Celebrex Mktg., Sales Practices and Prods. Liab. Litig.* in California; MDL-1742, *In Re Ortho Evra Prods. Liab. Litig.* in Ohio; MDL-1789, *In re Fosamax Prods. Liability Litig.* in New York; and MDL-1804, *In Re Stand 'N Seal, Prods. Liability Litig.*, where one of Mr. Grossman's firms serves on the PSC. One of Mr. Grossman's firms is also a court-appointed member of the PSC in the following mass tort litigations: *In Re Avandia*, *In Re Chantix*, *In Re Zicam*, *In Re Zimmer Knee*, *In Re Fosamax*, and the New Jersey state court coordination of Levaquin. One of Mr. Grossman's firms is co-lead in the NY Chantix Coordination and the New Jersey Reglan Coordination, as well as Risperdal in California, all Transvaginal Mesh PSC, and Propicia coordination.

After an \$8 million verdict in *Boles v. Merck* for a victim of Fosamax, Mr. Grossman, along with co-counsel, led the Trial Team in *Rosenberg v. Merck* which was the first bellwether New Jersey Trial in Atlantic County Superior Court. Mr. Grossman has become well known as a speaker and host of approximately 20 educational seminars designed to educate victims, the medical community, and other attorneys. Mr. Grossman has been quoted and has appeared in numerous local and national forums and in the media as a legal commentator and advocate of victims' rights against the corporate greed that plagues our nation. In January 2016, Mr. Grossman received the 2015 Litigator Award a significant distinction, achieved by less than 1% of all trial attorneys. This award is considered among the top honors bestowed on trial attorneys.

PEGGY J. WEDGWORTH is a senior partner and Chair of the Antitrust Practice Group at Milberg. She was an Assistant District Attorney in Brooklyn, New York from 1986 to 1989. Since leaving the public sector in 1989, she has handled numerous securities, commodities, antitrust and whistleblower matters, and is a Super Lawyer in New York, New York since 2016 and recommended in the Legal 500 United States for 2016. Ms. Wedgworth represents defrauded investors and consumers, and she currently represents consumers in *In re Contact Lens Antitrust Litig.*, and car dealerships in an antitrust action brought against software suppliers. She actively litigated *In re Initial Public Offering Sec. Litig.* for over five years, which settled for \$586 million, and *In re Merck & Co. Sec. Litig.*, which had a combined settlement totaling \$1.062 billion. She also won a jury trial against R.J. Reynolds in a wrongful death tobacco case in Florida state court. Ms. Wedgworth has litigated antitrust and commodities class actions on behalf of plaintiffs including extensive experience in all aspects of pre-trial discovery in, among other cases, *In re Brand Name Prescription Drugs Antitrust Litig.*, No. 94-897, 1996 WL 351180 (N.D. Ill. June 24, 1996) (approving \$351 million settlement); *In re NASDAQ Market-Makers Antitrust Litig.*, 187 F.R.D. 465 (S.D.N.Y.) (\$1,027,000,000 settlement); *In re Microsoft Litig.*, MDL 1332 (D. Md.) (consolidated class actions alleging long term unlawful maintenance of a monopoly and other anticompetitive conduct by Microsoft resulting favorable partial settlements); *In re Soybean Futures Litig.*, No. 89-7009 (N.D. Ill.) (\$21,500,000 class settlement providing claiming class

members/soybean futures traders a full recovery under plaintiffs' expert's formula); *In re Sumitomo Copper Litig.*, 74 F. Supp. 2d 393, 395 (S.D.N.Y. 1999) ("The recovery is the largest class action recovery in the 75 plus year history of the Commodity Exchange Act."); *Kohen v. Pac. Inv. Mgmt. Co., LLC*, No. 05-4681 (N.D. Ill.) (certified class of treasury bond futures purchasers alleging manipulation of the futures market); *Leider v. Ralfe*, No. 01-3137 (D.N.J.) (alleging price-fixing and monopolization in the diamond market by DeBeers resulting in a settlement of \$250,000,000 and extensive injunctive relief); and *In re Natural Gas Commodities Litig.*, 03-6186 (S.D.N.Y.) (\$101 million settlement). Ms. Wedgworth regularly speaks on topics relating to antitrust litigation, multi-district litigation and class action issues, and consumer matters. She is a member of the New York State Bar Association's Antitrust Committee, where she has served as both a speaker and panelist, and the American Bar Association, Antitrust Committee, and a member of the American Association of Justice.

MITCHELL BREIT is a Partner at Milberg in the firm's New York City office. During a legal career spanning more than 40 years he has been a champion of consumer and environmental protection, litigating class actions and mass torts of national scope that have brought relief to victims of corporate wrongdoing.

His career highlights include litigating the BP Gulf Oil Spill and Toyota Unintended Acceleration cases; settling a large overdraft fee class action against Bank of America; acting as lead counsel in the settlements of environmental claims involving Honeywell, Inc. and ConocoPhillips, Inc.; and serving on the Plaintiffs' Executive Committee in the ReNu MoistureLoc® litigation. Mr. Breit was also appointed as Liaison Counsel in the New York State consolidated Bextra-Celebrex litigation and was co-counsel in cases that ultimately achieved major public health victories against the tobacco industry.

Mr. Breit speaks frequently at national litigation conferences involving toxic and mass torts, class actions, and groundwater contamination, including Mealey's, HarrisMartin, Practicing Law Institute, and bar association conferences. He's been named to New York Metro Super Lawyers for ten straight years and to the Best Lawyers in America for three straight years. Mr. Breit has been an Adjunct Professor of Law at Brooklyn Law School, is a Board Member of Public Justice, and is a member of the American Association for Justice.

MARK E. SILVEY is a Partner at Milberg who acts as a lead attorney and primary litigator in many of the firm's class action and multidistrict litigation cases. During his 30-plus year legal career he has served as lead counsel in more than 100 jury trials, over 75 bench trials, and in numerous appellate cases in virtually all types of civil practice areas.

A native of Knoxville, Tennessee, Mr. Silvey grew up in the Halls community, with family ties going back several generations. He received a bachelor's degree in history from the University of Tennessee in 1984 with a concentration in medieval Japan, the Holy Roman Empire, and the 19th and early 20th century United States. Mr. Silvey also received his law degree from the University of Tennessee, where as a member of the National Trial Team, he received recognition as an Outstanding Clinic Student.

After graduation, Mr. Silvey worked at Wilson, Worley, Gamble & Ward, PC in Kingsport, Tennessee, representing hospital, railroad, industrial, and medical clients, among many others. Mark founded the Knoxville-based law firm of Bosch, Silvey & Lusk, PC in 1991. He handled all

types of litigation for the firm, including domestic relations, personal injury, business, real estate, and federal criminal matters.

Mr. Silvey relocated to Atlanta in 1997 to serve as an in-house attorney for State Farm Mutual Automobile Insurance Company. He later worked for Travelers Indemnity Company and in 2006, moved back to Knoxville to open a new in-house office for Travelers. In 2010, Mark returned to private practice with Greg Coleman Law.

HARPER SEGUI is a partner and practice leader in the Consumer Products Group at Milberg. Ms. Segui is an experienced litigator who focuses her practice on representing plaintiffs in complex class action litigation, including defective products, false advertising and mislabeling, and data breaches. Ms. Segui has actively lead a variety of complex cases across the country, having been instrumental in procuring millions of dollars in recoveries for plaintiffs and class members. In addition to individual class actions, Ms. Segui has enjoyed playing active roles in multidistrict litigation and has several times been appointed by courts to serve on Plaintiffs' Steering Committees. She was recently appointed as Co-Lead Counsel in multidistrict litigation involving a data breach. Ms. Segui has a broad spectrum of class actions and complex litigation experience that includes consumer product defects, building product defects, construction defects, unlawful fee charges, automobile defects, false advertising, and data breaches. Although integrally involved in every aspect of her cases, Ms. Segui has particularly honed technical skills which arm her with the ability to develop complex issues of science and technology at the heart of her cases, including the ability to engage experts and present these technical aspects in court. She been appointed to a number of leadership roles, and provided integral support for many more. Representative cases include *In Re: Windsor Wood Clad Windows Prods. Liab. Litig.*, 16-md-02668, MDL No. 2688 (E.D. Wis.) and *In Re: Allura Fiber Cement Siding Litig.*, No. 2:19-mn-02886 (D.S.C.), where she also serves as Co-Class Counsel. She also played essential supporting roles, including as a member of expert teams, in *In Re: MI Windows and Doors, Inc, Prods. Liab. Litig.*, 2:12-mn-00001, MDL No. 2333 (D.S.C.), *In Re: Pella Corp. Architect and Designer Series Windows, Mktg., Sales Prac. and Prods. Liab. Litig.*, 2:14-mn-00001, MDL No. 2514 (D.S.C.). Ms. Segui has been regularly selected to Super Lawyers as a Top-Rated Attorney in the areas of "Class Action & Mass Torts." She has co-authored several publications on product liability and other topics, and has been a lecturer on complex legal issues.

RACHEL SOFFIN is a partner and practice leader in the Consumer Products Group at Milberg. Ms. Soffin has spent the majority of her career prosecuting class action cases, including state and federal class actions involving product manufacturers and retailers, deceptive trade practices, privacy violations, and insurance and banking disputes. Prior to joining Milberg, Ms. Soffin worked in the area of consumer class actions in Morgan & Morgan's Tampa office. Prior to her time at Morgan & Morgan, Ms. Soffin served as in-house counsel for one of Florida's largest employee leasing companies. For the last eleven years, 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, deceptive trade practices, regulatory violations, and statutory violations: *Cleveland v. Whirlpool Corp.*, No. 0:20-cv-01906-WMV-KMM (D. Minn.) (recent preliminary approval of over \$20M value settlement involving defective dishwashers); *Hamm v. Sharp Electronics Corporation*, 5-19-cv-00488 (S.D. Fla.) (over \$100M value settlement in action

involving allegedly defective microwaves); *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); *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); *Corbett v. PharmaCare U.S. Inc.*, No. 3:21-cv-00137-GPC-AGS (S.D. Cal.) (recent order denying, in part, motion to dismiss class action involving dietary supplements that are illegal to sell under the FDCA, rejecting defendant's preemption arguments); *Kanan et al v. Thinx Inc.*, No. 20-cv-10341-JVS-JPR (C.D. Cal.) (recent order denying, in part, motion to dismiss class action involving menstrual products that contain allegedly harmful Polyfluoroalkyl substances associated with a variety of negative health effects for humans, including cancer).

Ms. Soffin has held numerous leadership roles in MDLs. Currently, Ms. Soffin serves on the Plaintiffs' Steering Committee in litigation involving defective breast implants, *In re: Allergan Biocell Textured Breast Implant Product Liability Litigation*, No. 2:19-md-02921-BRM-ESK (D.N.J.), where she is on the law and briefing and class certification committees. Ms. Soffin also currently serves as Co-Lead Counsel in the defective cookware MDL, *All-Clad Metalcrafters, LLC, Cookware Marketing and Sales Practices Litigation*, No. 2:21-mc-00491-NR (W.D. Pa.). In addition, Ms. Soffin served as co-lead settlement class counsel in *In Re: Allura Fiber Cement Siding Prods. Liability Litig.*, No. 2:19-mn-02886-DCN (D.S.C.) MDL, which resulted in a \$12.5M settlement involving defective fiber cement siding.

Ms. Soffin has also been a lecturer at several conferences involving class action topics. Ms. Soffin is admitted to practice in the state courts of Florida and Georgia, and in the United States District Court for the Middle District of Florida, the United States District Court for the Southern District of Florida, the United States District Court for the Northern District of Georgia, the United States District Court for the Northern District of Illinois, and the United States Court of Appeals for the Eleventh Judicial Circuit. Ms. Soffin has been designated by Super Lawyers as a Florida Rising Star (2011-2013), and as a Florida Super Lawyer (2014-2018, 2022) in the fields of Class Actions/Mass Torts.

ADAM EDWARDS is a partner and practice leader in the Consumer Products Group at Milberg. Mr. Edwards acts as the lead attorney on many of the firm's serious personal injury cases. He also serves as a primary litigator on many of the firm's class action, multi-district litigation, and defective product cases. He attended The University of Tennessee where he received his undergraduate degree in political science and served as a field office intern for United States Senator and former Senate Majority Leader, Dr. Bill Frist. After graduating from UT, Mr. Edwards was accepted into the Juris Doctor program at the Washburn University School of Law where he was awarded an academic merit scholarship after his first year of coursework. While at Washburn, Adam excelled in oral advocacy and was selected as the President of the Moot Court Counsel on Oral Advocacy. He was also selected as a member of the Order of Barristers. He received his JD

after graduating with Dean's Honors in 2000. Adam's formal legal career started when he accepted a position as an Attorney at Husch Blackwell (formerly Blackwell Sanders) in Kansas City, Missouri in 2000. During the first four years of his legal career, Mr. Edwards successfully defended a number of well-known insurance companies and corporations in a wide range of litigation matters. Today, Mr. Edwards utilizes his extensive trial experience and diverse background to advocate for personal injury victims and consumers who have suffered damages resulting from dangerous and defective products. Mr. Edwards was selected by fellow members of the Knoxville Bar as a "Top Attorney" in CITYVIEW Magazine's annual Top Attorney's issue. He was selected as a Top Attorney for a second time in 2010. In 2017, Mr. Edwards was named one of the Top 100 Trial Lawyers by the American Trial Lawyers Association. He was also selected for membership into the Million Dollar Advocates Forum, an honor reserved for trial lawyers who have secured a settlement or verdict in excess of one million dollars.

ANDREI RADO is a partner at Milberg and focuses his practice on securities litigation, consumer class actions, and SEC whistleblower matters. The cases Mr. Rado is working on currently, or has litigated recently, are typical of his 20-year career: a class action pending in Manhattan federal court on behalf of universal life customers victimized by inflated cost of insurance deductions from the cash value of their policies; a class action in Los Angeles federal court on behalf of investors victimized by a Ponzi scheme; and class actions in Chicago federal court on behalf of consumers whose biometrics have been captured in violation of the Illinois Biometrics Information Privacy Act. Mr. Rado's securities practice has included numerous litigations nationwide that have resulted in massive recoveries, including, among the most complex, *In re Initial Public Offering Sec. Litig.*, which alleged, in hundreds of consolidated cases, that investment banks manipulated the initial public offerings of hundreds of companies. Mr. Rado has also represented investors against mutual funds including a series of cases alleging that mutual fund managers allowed select investors to profit by improperly timing their trading in fund shares. In another mutual fund litigation, Mr. Rado represented investors victimized by overvaluation of illiquid securities. Mr. Rado was important in the firm's launching and organization of litigation of Mr. Rado's practice has focused on investigating, launching, and litigating securities class actions and consumer class actions. These cases are as diverse as consumer fraud itself. Early in his career, Mr. Rado litigated a case against jewelry company Zales for improperly denying credit-insurance claims made by unemployed and retired consumers, and a class action against computer maker Gateway for improperly understating in advertising the costs of internet access to consumers, some of whom incurred internet-access fees of hundreds of dollars. More recently, among other cases, Mr. Rado has launched and litigated consumer cases against companies that misled consumers by inflating the technical specifications of their products, and "all natural" food cases, including the first case alleging that products made from genetically modified organisms (GMOs) should not be advertised as natural. Prior to joining Milberg, Mr. Rado worked as an attorney at a New York City-based investment bank focusing on compliance, with rules and regulations relating to re-sales of control and restricted securities under the Securities Act of 1933. Mr. Rado also worked at another prominent New York City law firm specializing in plaintiffs' securities class action litigation. Mr. Rado received his Juris Doctor degree from St. John's University School of Law, cum laude, in 1999, and is admitted to practice law in New York. While in law school, Mr. Rado served as a senior member of the New York International Law Review. He is admitted to practice in the courts of the State of New York, as well as the United States District Court for the Southern District of New York. Mr. Rado was born in Bucharest Romania, and lived in Israel for several

years before immigrating to New York in the early 80s. Since the passage of the Dodd-Frank Act in 2010, Mr. Rado has represented numerous whistleblowers before the commission under a program that rewards and protects whistleblowers that report violations of securities laws to the Securities and Exchange Commission. These involved a variety of complaints, including allegations of bribing foreign officials to gain business, accounting fraud, and consumer fraud, against a variety of companies diverse in size and business.

ROY SHIMON is a partner at Milberg and focuses his practice on securities and stockholder derivative litigation in both state and federal courts. Mr. Shimon also has experience in the areas of insider trading and antitrust litigation. Super Lawyers recognized him as a “Rising Star” in the New York Metro area each year from 2014-2018. Mr. Shimon has served as lead or co-lead counsel in a number of complex matters on behalf of stockholders and employee investors, including *In re PLX Tech. Inc. S’holders Litig.* (Del Ch.) (stockholder recovery of \$14.1 million); *In re Zynga Inc. Sec. Litig.* (N.D. Cal.) (investor recovery of \$23 million); *In re Popular Inc. ERISA Litig.* (D.P.R.) (employee investor recovery of \$8.2 million); and *Shanehchian v. Macy’s Inc.* (S.D. Ohio) (employee investor recovery of \$8.5 million). Mr. Shimon currently represents the City of Charlotte, North Carolina in ongoing antitrust litigation in *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687 (D.N.J. 2015). Mr. Shimon graduated *cum laude* from Franklin & Marshall College in 2003, where he was inducted into the Pi Sigma Alpha and Alpha Kappa Delta National Honor Societies. He received his J.D. from St. John’s University School of Law in 2006, where he served on the Executive Board of the Moot Court Honor Society and as Vice President of the Entertainment & Sports Law Society. Mr. Shimon is admitted to practice in the state and federal courts of New York.

ROBERT A. WALLNER is a Partner at Milberg and received his B.A. degree from the University of Pennsylvania in 1976 graduating *magna cum laude*. He attended New York University School of Law, earning his J.D. degree in 1979. He was elected to the law school’s Order of the Coif and served as an editor of the New York University Law Review. Mr. Wallner has litigated complex securities, consumer and antitrust class actions throughout the country. He has represented plaintiffs in lawsuits arising out of the Madoff Ponzi scheme, including the court-appointed litigation trustee of two Madoff “feeder funds.” He has also represented investors in *In re Merck & Co., Inc. Sec. Litig.* (D.N.J.), which resulted in a \$1.062 billion recovery, *In re Initial Public Offering Sec. Litig.* (S.D.N.Y.), *In re CMS Energy Corp. Sec. Litig.* (E.D. Mich.), and *In re Deutsche Telekom AG Sec. Litig.* (S.D.N.Y.), and consumers in *In re Synthroid Mktg. Litig.* (N.D. Ill.) and the *Mercedes-Benz Tire Litig.* (D.N.J.). Mr. Wallner is a frequent lecturer on securities and complex litigation issues. He has served on the editorial board of Securities Litigation Report, as a faculty member of the American Bar Association’s First Annual National Institute on Securities Litigation and Arbitration, and as a member of the Federal Courts Committee of the Association of the Bar of the City of New York. He has been recognized in Lawdragon’s “100 Lawyers You Need to Know in Securities Litigation.”

ALEX. R. STRAUS is Senior Counsel at Milberg. Mr. Straus is currently licensed to practice law in California, Massachusetts, New York, Rhode Island, and South Carolina. For more than a decade, he has represented consumers, labor unions, and municipalities throughout the United States in practice areas ranging from complex tort and personal injury to antitrust and securities litigation.

Prior to joining Milberg, Alex spent the majority of his legal career as a litigation attorney with Motley Rice LLC after a long career as an investigative journalist and author. In 2013, Alex authored an amicus curiae brief filed in the Supreme Court of the United States in support of a shipyard worker who died as a result of asbestos exposure

LEIGH SMITH is Senior Counsel at Milberg. Ms. Smith has practiced law at firms in New York and New Jersey and has prosecuted a broad range of cases during her career. Her cases have included complex class actions brought on behalf of injured consumers and investors and also actions alleging discrimination, breaches of fiduciary duty, fraudulent transfers, and legal malpractice. Her noteworthy representations include *In re Tyco Int'l Sec. Litig.*, No. 02-266-PB (D.N.H. 2002), a case involving complex allegations of fraud in which she played a leading role in achieving a multi-billion dollar settlement, and U.S. ex rel. *Cordingley v. Good Shepherd Hospice, Mid-America, Inc.*, No.4:11-cv-1087 (W.D. Mo. 2011), a qui tam action in which she successfully represented the relator. Ms. Smith earned a B.A. and an M.A. in French from Rutgers University. Prior to law school, Ms. Smith taught French language and literature, and she also taught English in a Parisian suburb. At Cornell Law School, Ms. Smith was on the editorial board of the Journal of Law and Public Policy, was an active member of the Moot Court Board, and was co-president of Cornell's Lambda Law Student Association. Ms. Smith is a member of the Women's Bar Association of the State of New York and the Westchester Women's Bar Association.

BARRY A. WEPRIN is Of Counsel at Milberg and graduated from Harvard College in 1974. He received a J.D. degree from the New York University School of Law in 1978, and a master of public affairs from the Woodrow Wilson School of Princeton University in 1978. While in law school, Mr. Weprin was notes and comments editor of the New York University Law Review. Since joining the firm, Mr. Weprin has specialized in securities and insurance litigation. He has served as lead or co-lead counsel in a number of complex securities class action litigations. He was one of the principal attorneys in the sales practice litigations against The New York Life Insurance Company, The New England Life Insurance Service Company, The Massachusetts Mutual Life Insurance Company, The John Hancock Mutual Life Insurance Company, and The Prudential Life Insurance Company which recovered billions of dollars for policyholders. Mr. Weprin is a frequent lecturer on complex litigation issues. Previously, Mr. Weprin served as law clerk to Judge Charles P. Sifton of the United States District Court for the Eastern District of New York and was associated with the law firm of Wachtell Lipton Rosen & Katz where he specialized in commercial and securities litigation. He also served as general counsel to the New York State Housing Finance Agency and the New York State Medical Care Facilities Finance Agency, two agencies that issue tax exempt bonds for financing nonprofit medical facilities and qualified housing projects. Mr. Weprin is very active in his community of Mamaroneck, New York, having served as a Town Councilman and a member of the Zoning Board of Appeals. He is a former President of the National Association of Shareholder and Consumer Attorneys (NASCAT) as well as Vice President of the Institute for Law and Economic Policy (ILEP). Mr. Weprin is a member of the American Bar Association, the Association of the Bar of the City of New York, the New York County Lawyers Association, and the New York State Bar Association. Mr. Weprin is admitted to practice in New York, the United States District Court for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second Circuit, and the United States Supreme Court.

SANFORD P. DUMAIN is Of Counsel at Milberg and attended Columbia University where he received his B.A. degree in 1978. He graduated *cum laude* from Benjamin N. Cardozo School of Law of Yeshiva University in 1981. Mr. Dumain represents plaintiffs in cases involving securities fraud, consumer fraud, insurance fraud, and violations of the antitrust laws. Mr. Dumain was co-lead counsel in *In re Tyco Int'l Ltd., Sec. Litig.* in which \$3.2 billion was recovered for investors. Mr. Dumain also served as lead counsel in the securities class actions against Nortel and Biovail, which are the highest and third highest recoveries ever in cases involving Canadian companies. The Nortel settlement was valued at over \$1 billion and Biovail settled for over \$138 million in cash. Mr. Dumain successfully represented the City of San Jose, California against 13 of the City's broker-dealers and its outside accountants in connection with major losses in unauthorized bond trading. Mr. Dumain began his career as a law clerk to Judge Warren W. Eginton, United States District Court for the District of Connecticut 1981-1982. During the early years of his practice, he also served as an Adjunct Instructor in Legal Writing and Moot Court at Benjamin N. Cardozo School of Law. Mr. Dumain has lectured for ALI-CLE concerning accountants' liability and has prosecuted several actions against accounting firms. Judge Janet C. Hall of the District of Connecticut made the following comment in *In re Fine Host Corp. Securities Litig.*, No. 97-2619 (D.Conn.): "The court also finds that the plaintiff class received excellent counseling, particularly from the Chair of the Plaintiffs' Executive Committee, Attorney Dumain." Mr. Dumain is admitted to practice in the State of New York, United States District Court for the Southern, Eastern, and Western Districts of New York, District of Colorado, and District of Connecticut, and United States Courts of Appeals for the First, Second, Third, Sixth, Seventh, and Eighth Circuits.

BLAKE HUNTER YAGMAN is an associate at Milberg attorney with a focus on representing consumers, investors, and small businesses in antitrust and consumer protection litigation. Mr. Yagman's career in the law began as an undergraduate while at the University of Miami, where he worked as a judicial intern to the Honorable Lawrence Schwartz of the Eleventh Judicial Circuit Court of the State of Florida. As a student at the University of Miami, Mr. Yagman was formatively shaped by his experience as a member of student government; he was a passionate advocate on behalf of the school's mental health programs and was twice elected Senator for his graduating class. As a member of the Senate, he passed more bills than any other Senator and Chaired the Policy and Finance Committee. As a junior, Mr. Yagman was a nominee for Vice President of the student body. Mr. Yagman received a scholarship to attend the Benjamin N. Cardozo School of Law and completed his juris doctorate with a concentration in Intellectual Property and Data Law. While in law school, he championed the rights of athletes – working on concussion litigation as an intern and writing for major publications on sports legal issues from the athlete's perspective. In 2017, Mr. Yagman spoke on behalf of collegiate athletes on a sports law symposium panel on antitrust issues pertaining to the National Collegiate Athletic Association. As an attorney, prior to joining Milberg, Mr. Yagman litigated antitrust, consumer fraud, and securities fraud cases at a national plaintiffs' class action firm based in New York City. With respect to antitrust cases, Mr. Yagman has extensive experience in food industry-based antitrust actions; including experience in price fixing cases against the tuna industry (*In re Packaged Seafood Antitrust Litigation*), the egg industry (*In re Processed Egg Products Antitrust Litigation*), and the broiler chicken industry (*In re Broiler Chicken Antitrust Litigation*). With respect to consumer fraud cases, Mr. Yagman has experience in technology-focused consumer actions, including working on a case brought on behalf of Apple iPhone users (*In re Apple Inc. Device Performance Litigation*). Mr. Yagman has

represented plaintiffs in high profile class action litigation during his time at Milberg. Examples of plaintiffs he has represented include: consumers in a class action against a sports league for refund practices during a pandemic; purchasers of gasoline at retail who allegedly paid artificially higher prices as a result of manipulation on the spot market; and investors who paid undisclosed hard-to-borrow interest fees to a stock trading platform. In 2020, Mr. Yagman was a guest lecturer at Hofstra University's law school on the topic of Indirect Purchaser Standing in Private Plaintiffs Antitrust Class Actions After the Supreme Court's Decision in *Apple v. Pepper*. Mr. Yagman is admitted to practice in the State of New York. His passion for economic and social justice drives his practice. He is a member of the LGBT Bar Association of Greater New York (LeGaL).

ADAM H. COHEN is an associate at Milberg. His practice focuses on data breach, pharmaceutical and consumer protection class actions, as well as false claims act litigation. Mr. Cohen has dedicated his entire legal career to protecting consumers. Prior to joining Milberg, Mr. Cohen was an Enforcement Attorney for the Consumer Financial Protection Bureau (CFPB) where he led complex investigations of large banks, financial services companies, and others for violations of federal laws and regulations across a wide range of consumer financial products. Mr. Cohen also provided expertise to bank examiners during supervisory examinations of banks and financial services companies and served on multiple Bureau-wide policy groups. Before working for the CFPB, Mr. Cohen served as an Assistant Attorney General for the New York Attorney General's (NYAG) Consumer Frauds and Protection Bureau where he investigated and litigated consumer protection actions with a focus on mortgage-related investigations and litigation. The NYAG awarded Mr. Cohen the Lefkowitz Memorial Award for Outstanding Service for his work on financial services enforcement litigation. Mr. Cohen began his legal career at Mobilization for Justice where he launched a pro bono foreclosure defense practice that helped hundreds of families remain in their home during the foreclosure crisis. Mr. Cohen graduated from the Sandra Day O'Connor College of Law at Arizona State University with Highest Honors for Pro Bono Service and obtained his B.A. from New York University *magna cum laude*. He is admitted to practice in New York, the Southern District of New York and the Eastern District of New York.

J. BIRT REYNOLDS is an associate at Milberg and represents whistleblowers who bring claims under the federal False Claims Act and its state counter-parts. Since joining the firm's Qui Tam practice group, he has worked on several cases that have brought substantial recoveries to federal and state governments. Mr. Reynolds also represents plaintiffs in complex commercial litigation involving contractual, tort, and statutory claims. Before joining Milberg, Mr. Reynolds clerked for a magistrate judge in the Middle District of Florida, as well as Florida appellate and trial court judges. Mr. Reynolds earned his J.D. from Case Western Reserve University School of Law in 2004. He is admitted to practice in the state courts of Florida and New York, the United States District Courts for the Eastern and Southern Districts of New York, the Northern, Middle, and Southern Districts of Florida, and the Western District of Michigan.

Additional Notable Class Action Cases

Antitrust

In re: TFT-LCD (Flat Panel) Antitrust Litigation, No. 3:07-cv-01827, MDL No. 1827 (N.D. Cal.) (combined settlement totaling nearly \$1.1 billion in suit alleging the illegal formation of an international cartel to restrict competition in the LCD panel market) (2012).

Appliances

Ersler, et. al v. Toshiba America et. al, No. 07- 2304 (D.N.J.) (settlement of claims arising from allegedly defective television lamps) (2009).

Maytag Neptune Washing Machines (class action settlement for owners of Maytag Neptune washing machines).

Stalcup, et al. v. Thomson, Inc. (Ill. Cir. Ct.) (\$100 million class settlement of claims that certain GE, PROSCAN and RCA televisions may have been susceptible to temporary loss of audio when receiving broadcast data packages that were longer than reasonably anticipated or specified) (2004).

Hurkes Harris Design Associates, Inc., et al. v. Fujitsu Computer Prods. of Am., Inc. (settlement provides \$42.5 million to pay claims of all consumers and other end users who bought certain Fujitsu Desktop 3.5” IDE hard disk drives) (2003).

Turner v. General Electric Company, No. 2:05-cv-00186 (M.D. Fla.) (national settlement of claims arising from allegedly defective refrigerators) (2006).

Automobiles

In re General Motors Corp. Speedometer Prods. Liability Litig., MDL 1896 (W.D. Wash.) (national settlement for repairs and reimbursement of repair costs incurred in connection with defective speedometers) (2007).

Baugh v. The Goodyear Tire & Rubber Company (class settlement of claims that Goodyear sold defective tires that are prone to tread separation when operated at highway speeds; Goodyear agreed to provide a combination of both monetary and non-monetary consideration to the Settlement Class in the form of an Enhanced Warranty Program and Rebate Program) (2002).

Lubitz v. Daimler Chrysler Corp., No. L-4883-04 (Bergen Cty. Super. Ct, NJ 2006) (national settlement for repairs and reimbursement of repair costs incurred in connection with defective brake system; creation of \$12 million fund; 7th largest judgment or settlement in New Jersey) (2007).

Berman et al. v. General Motors LLC, Case No. 2:18-cv-14371 (S.D. Fla.) (Co-Lead Counsel; national settlement for repairs and reimbursement of repair costs incurred in connection with Chevrolet Equinox excessive oil consumption).

Civil Rights

In re Black Farmers Discrimination Litigation, Case No. 1:08-mc-00511 (D.D.C.) (\$1.25 billion settlement fund for black farmers who alleged U.S. Department of Agriculture discriminated against them by denying farm loans) (2013).

Bruce, et. al. v. County of Rensselaer et. al., Case No. 02-cv-0847 (N.D.N.Y.) (class settlement of claims that corrections officers and others employed at the Rensselaer County Jail (NY) engaged in the practice of illegally strip searching all individuals charged with only misdemeanors or minor offenses) (2004).

Commercial

In re: Outer Banks Power Outage Litigation, 4:17-cv-141 (E.D.N.C) (Co-Lead Counsel; \$10.35 million settlement for residents, businesses, and vacationers on Hatteras and Ocracoke Islands who were impacted by a 9-day power outage) (2018)

Construction Materials

Cordes et al v. IPEX, Inc., No. 08-cv-02220-CMA-BNB (D. Colo.) (class action arising out of defective brass fittings; court-appointed member of Plaintiffs' Steering Committee) (2011).

Elliott et al v. KB Home North Carolina Inc. et al 08-cv-21190 (N.C. Super. Ct. Wake County) (Lead Counsel; class action settlement for those whose homes were constructed without a weather-resistant barrier)(2017)

In re: Pella Corporation Architect and Designer Series Windows Marketing, Sales Practices and Products Liability Litigation, MDL No. 2514 (D.S.C.)(class action arising from allegedly defective windows; Court-appointed Co-Lead Counsel).

In re MI Windows and Doors, Inc., Products Liability Litigation, MDL No. 2333 (D.S.C) (National class action settlement for homeowners who purchased defective windows; Court-appointed Co-Lead Counsel).

In re: Atlas Roofing Corporation Chalet Shingle Products Liability Litig., MDL No. 2495 (N.D. Ga.) (class action arising from allegedly defective shingles; Court-appointed Co-Lead Counsel).

Helmer et al. v. Goodyear Tire & Rubber Co., No. 12-cv-00685-RBJ (D. Colo. 2012) (class action arising from allegedly defective radiant heating systems; Colorado class certified, 2014 WL 3353264, July 9, 2014)).

In re: Zurn Pex Plumbing Products Liability Litigation, No. o:08-md-01958, MDL No. 1958 (D. Minn.) (class action arising from allegedly plumbing systems; member of Executive Committee; settlement) (2012).

Hobbie, et al. v. RCR Holdings II, LLC, et al., No. 10-1113, MDL No. 2047 (E.D. La.) (\$30 million settlement for remediation of 364 unit residential high-rise constructed with Chinese drywall) (2012).

In re: Chinese Manufactured Drywall Products Liability Litigation, No. 2:09-md-02047, MDL No. 2047 (E.D. La.) (litigation arising out of defective drywall) (appointed Co-Chair, Insurance Committee) (2012).

Galanti v. Goodyear Tire & Rubber Co., No. 03-209 (D.N.J. 2003) (national settlement and creation of \$330 million fund for payment to owners of homes with defective radiant heating systems) (2003).

In re Synthetic Stucco Litig., Civ. Action No. 5:96-CV-287-BR(2) (E.D.N.C.) (member of Plaintiffs' Steering Committee; settlements with four EIFS Manufacturers for North Carolina homeowners valued at more than \$50 million).

In re Synthetic Stucco (EIFS) Prods. Liability Litig., MDL No. 1132 (E.D.N.C.) (represented over 100 individuals homeowners in lawsuits against homebuilders and EIFS manufacturers).

Posey, et al. v. Dryvit Systems, Inc., Case No. 17,715-IV (Tenn. Cir. Ct) (Co-Lead Counsel; national class action settlement provided cash and repairs to more than 7,000 claimants) (2002).

Sutton, et al. v. The Federal Materials Company, Inc., et al, No. 07-CI-00007 (Ky. Cir. Ct) (Co-Lead Counsel; \$10.1 million class settlement for owners of residential and commercial properties constructed with defective concrete).

Staton v. IMI South, et al. (Ky. Cir. Ct.) ((Co-Lead Counsel; class settlement for approximately \$30 million for repair and purchase of houses built with defective concrete).

In re Elk Cross Timbers Decking Marketing, Sales Practices and Products Liability Litigation, No. 15-cv-0018, MDL No. 2577 (D.N.J.) (Lead Counsel; national settlement to homeowners who purchased defective GAF decking and railings).

Bridget Smith v. Floor and Decor Outlets of America, Inc., No. 1:15-cv-4316 (N.D. Ga.) (Co-Lead Counsel; National class action settlement for homeowners who purchased unsafe laminate wood flooring).

In re Lumber Liquidators Chinese-Manufactured Flooring Products Marketing, Sales Practices and Products Liability Litigation MDL No. 1:15-md-2627 (E.D.Va.) (Formaldehyde case; \$36 million national class action settlement for member who purchased a certain type of laminate flooring).

In re Lumber Liquidators Chinese-Manufactured Laminate Flooring Durability Marketing, Sales Practices Litigation MDL No. 1:16-md-2743 (E.D.Va.) (Co-Lead Counsel; Durability case; \$36 million national class action settlement for member who purchased a certain type of laminate flooring).

In re Windsor Wood Clad Window Products Liability Litigation MDL No. 2:16-md-02688 (E.D. Wis.) (National class action settlement for homeowners who purchased defective windows; Court-appointed Lead Counsel).

In re Allura Fiber Cement Siding Products Liability Litigation MDL No. 2:19-md-02886 (D.S.C.) (class action arising from allegedly defective cement board siding; Court-appointed Lead Counsel).

Environmental

Nnadili, et al. v. Chevron U.S.A., Inc., No. 02-cv-1620 (D.D.C.) (\$6.2 million settlement for owners and residents of 200 properties located above underground plume of petroleum from former Chevron gas station) (2008).

In re Swanson Creek Oil Spill Litigation, No. 00-1429 (D. Md.) (Lead Counsel; \$2.25 million settlement of litigation arising from largest oil spill in history of State of Maryland) (2001).

Fair Labor Standards Act/Wage and Hour

Craig v. Rite Aid Corporation, Civil No. 08-2317 (M.D. Pa.) (FLSA collective action and class action settled for \$20.9 million) (2013).

Stillman v. Staples, Inc., Civil No. 07-849 (D.N.J. 2009) (FLSA collective action, plaintiffs' trial verdict for \$2.5 million; national settlement approved for \$42 million) (2010).

Lew v. Pizza Hut of Maryland, Inc., Civil No. CBB-09-CV-3162 (D. Md.) (FLSA collective action, statewide settlement for managers-in-training and assistant managers, providing recompense of 100% of lost wages) (2011).

Financial

Roberts v. Fleet Bank (R.I.), N.A., Civil Action No. 00-6142 (E. D. Pa.) (\$4 million dollar settlement on claims that Fleet changed the interest rate on consumers' credit cards which had been advertised as "fixed.") (2003).

Penobscot Indian Nation et al v United States Department of Housing and Urban Development, N. 07-1282 (PLF) (D.D.C. 2008) (represented charitable organization which successfully challenged regulation barring certain kinds of down-payment assistance; Court held that HUD's promulgation of rule violated the Administrative Procedure Act) (2008).

Impact Fees

Town of Holly Springs, No. 17-cvs-6244, 17-cvs-6245, 18-cvs-1373 (Wake Co., NC) (Court appointed Class Counsel; Class action settlement with a \$7.9 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the town) (2019).

Larry Shaheen v. City of Belmont, No. 17-cvs-394 (Gaston Co., NC) (Court appointed Class Counsel; Class action settlement with a \$1.65 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the city) (2019).

Upright Builders Inc. et al. v. Town of Apex, No. 18-cvs-3720 & 18-cvs-4384, (Wake Co., NC) (Court appointed Class Counsel; Class action settlement with a \$15.3 million fund for builders and developers to recover improper capacity replacement and transportation paid fees to the town) (2019).

Mayfair Partners, LLC et al. v. City of Asheville, No. 18-cvs-04870 (Buncombe County) (Court appointed Class Counsel; Class action settlement with a \$1,850,000 million fund for builders and developers to recover improper impact fees paid to the city) (2020).

Shenandoah Homes, LLC v. Town of Clayton, No. 19-cvs-640 (Johnston County) (Court appointed Class Counsel; Class action settlement with a \$2.7 million fund for builders and developers to recover improper impact fees paid to the town) (2020).

Brookline Homes LLC v. City of Mount Holly, Gaston County file no. 19-cvs-1163 (Gaston County) (Court appointed Class Counsel; Class action settlement with a \$483,468 fund for builders and developers to recover improper impact fees paid to the city) (2020).

Eastwood Construction, LLC et. al v. City of Monroe, Union County file nos. 18-CVS-2692 (Union County) (Court appointed Class Counsel; Class action settlement with a \$1,750,000 million fund for builders and developers to recover improper impact fees paid to the city) (2020).

Insurance

Young, et al. v. Nationwide Mut. Ins. Co, et al., No. 11-5015 (E.D. Ky.) (series of class actions against multiple insurance companies arising from unlawful collection of local taxes on premium payments; class certified and affirmed on appeal, 693 F.3d 532 (6th Cir., 2012); settlements with all defendants for 100% refund of taxes collected) (2014).

Nichols v. Progressive Direct Insurance Co., et al., No. 2:06cv146 (E.D. Ky.) (Class Counsel; class action arising from unlawful taxation of insurance premiums; statewide settlement with Safe Auto Insurance Company and creation of \$2 million Settlement Fund; statewide settlement with Hartford Insurance Company and tax refunds of \$1.75 million) (2012).

Privacy/Data Breach

In Re: U.S. Office of Personnel Management Data Security Breach Litigation, No. 15-1393 (ABJ), MDL No. 2664 (D.D.C.) (court appointed interim Liaison Counsel).

In re Google Buzz Privacy Litigation, No. 5:10-cv-00672 (N.D. Cal.) (court-appointed Lead Class Counsel; \$8.5 million cy pres settlement) (2010).

In re: Dept. of Veterans Affairs (VA) Data Theft Litig., No. 1:2006-cv-00506, MDL 1796 (D.D.C.) (Co-Lead counsel representing veterans whose privacy rights had been compromised by the theft of an external hard drive containing personal information of approximately 26.6 million veterans and their spouses; creation of a \$20 million fund for affected veterans and a cy pres award for two non-profit organizations) (2009).

In re: Adobe Systems Inc. Privacy Litigation, No. 5:13-cv-05226 (N.D. Cal. 2015) (settlement requiring enhanced cyber security measures and audits) (2015).

Exhibit B



WHITFIELD BRYSON LLP
ATTORNEYS AT LAW

FIRM RESUME

FIRM PROFILE

With offices located in Raleigh, North Carolina; Madisonville, Kentucky; Nashville, Tennessee; Charleston, South Carolina; and Los Angeles, California, Whitfield Bryson LLP is dedicated to representing plaintiffs in class actions, mass torts, and individual actions in courts throughout the United States. Founded in January 2012, the firm was created by a merger of three firms with decades of experience representing plaintiffs in complex litigation. Whitfield Bryson LLP has since expanded, litigating consumer fraud domestically and internationally.

FIRM RESUME Attorney Profiles

John C. Whitfield Founding Partner

For over 38 years, John has been one of the premier trial attorneys in Kentucky and Tennessee. He has represented numerous injured parties in the Commonwealth of Kentucky, Tennessee, and throughout the southeastern United States. He has concentrated primarily on complex civil litigation cases, and over his career has brought to settlement or judgment over 45 cases in excess of a million dollars each. John is certified as a civil trial specialist by the National Board of Trial Advocacy and has represented individuals in all walks of life against negligent workplace practices, reckless physicians, predatory businesses, and inattentive truck and automobile drivers among many others. John has an additional concentration in the Nashville, Tennessee area of representing motorcyclists who have been injured through no fault of their own.

John graduated with distinction from the University of Kentucky in 1989, and then attended law school at the university, obtaining his J.D. in 1982. Throughout his career, John has represented scores of individuals who have been the victims of medical negligence, defective drugs, and medical devices, obtaining verdicts and settlements in both state and federal courts. He has handled cases for landowners victim to fraudulent mine royalty practices, for subsidence caused by coal mining, for homeowners whose homes and business contained defective concrete, and for Kentucky residents who were overcharged for premium insurance taxes.

John is a frequent lecturer of litigation subjects with the Kentucky Justice Association and American Association for Justice and has been recognized as a Kentucky Super Lawyer multiple times. He is AV rated by the Martindale-Hubbell rating service.

Daniel K. Bryson Founding Partner

Dan is a founding partner of the firm and is one of the nation's most respected and experienced attorneys in the country in the area of consumer class actions and mass torts. Dan also has significant experience working with attorneys, funders and other partners on international litigation projects in the Courts in Amsterdam, the United Kingdom, Belgium, France, Spain and Portugal, among others.

For over 32 years, Dan has handled hundreds of insurance related disputes, including first party bad faith insurance cases, and business interruption cases. Dan has written and taught numerous continuing legal education courses on a variety of insurance related topics. Dan and members of his firm are well equipped and dedicated to handling these cases on behalf of all entities who have had improperly denied claims.

Dan is a frequent lecturer and writer on a variety of consumer class action, insurance, and mass tort related disputes. He has been quoted by a variety of media outlets over the years including the Wall Street Journal, Washington Post, New York Times, Law360 and Lawyers Weekly to name a few. He has been named as a member of the Legal Elite and Super Lawyers in North Carolina on numerous occasions. He has been awarded the designation of one of the Top 25 lawyers in Raleigh by Charlotte Magazine for a number of years including 2020.

Dan is on the Executive Board and Vice-President of the Public Justice Foundation Board. Public Justice is a nationwide public interest law firm. See www.publicjustice.net for more information about this great organization. Dan is also an adjunct professor at Campbell Law School in Raleigh, NC where he teaches "Introduction to Class Actions and Multi-district litigation." Dan is also the current Board Chair of Theatre Raleigh and enjoys running, playing the guitar, and golf in his free time.

Each year, Dan and members of his firm run a marathon. Last year, they ran in the St. George Marathon in St. George Utah. In 2018, they ran in the New York Marathon.

Scott C. Harris
Managing Partner

Scott's practice is focused on fighting for individuals and homeowners in complex litigation, including construction defect, mass tort, product liability, and wrongful death litigation. Scott has played a key role in securing substantial verdicts and settlements in a variety of cases, including a multi-million dollar verdict in favor of homeowners for a developer's unfair and deceptive advertising and shoddy road construction, a legal malpractice case, and several defective condominium construction cases.

Scott earned his law degree from Wake Forest University School of Law in 2006 and his Bachelor of Arts from Hampden-Sydney College, in 2001. While at Hampden-Sydney College, Scott was Chairman of the Honor Committee and a member of the national leadership honor Society, Omicron Delta Kappa. Scott was named to the *Super Lawyers' Rising Stars* list as one of the top up-and-coming attorneys in North Carolina for 2010 and 2012-2018 and selected for inclusion in *Business North Carolina* Legal Elite for 2013.

Matthew E. Lee
Partner

For the last 10 years, Matt has focused his practice on fighting for consumers in complex litigation. Matt has been recognized for his leadership on class actions and product liability matters. Since 2012, he has been regularly selected to *Super Lawyers* as a top-rated attorney in

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“Class Action & Mass Torts” practice area and written for a national publication on product liability cases. Matt is a frequent author and lecturer on product liability, construction, and insurance topics in North Carolina. Matt takes great pride in being part of a firm that stands shoulder to shoulder with its clients against some of the largest corporations in the world.

Matt handles complex litigation, primarily construction defect, product liability, business disputes, and wrongful death cases, and has secured substantial verdicts and settlements in a variety of matters, including multi-million dollar verdicts for homeowners associations in construction defect litigation and large settlements in class actions, product liability, and employment cases.

Matt is a graduate of Leadership Raleigh 25 with the Greater Raleigh Chamber of Commerce and co-chair of the American Association for Justice (AAJ) Trial Advocacy Competition in Raleigh, NC.

Matt earned his law degree from Wake Forest University School of Law in 2006 and his Bachelor of Arts from The Catholic University of America, *cum laude*, in 2001. While at Wake Forest, Matt was the 2005 Zeliff Trial Competition Champion, a regional finalist at the 2006 American Association for Justice (AAJ) Trial Advocacy Competition, the AAJ Student Chapter President, and was selected as a member of the Order of Barristers. In addition, Matt spent several months clerking for the United States Attorney’s Office in Greensboro, North Carolina.

Caroline Ramsey Taylor **Partner**

Caroline is a partner focusing her practice on complex civil litigation and personal injury. After clerking for Whitfield Bryson LLP during the summer of 2012, she officially joined the firm in March 2013, and actively practices in both the firm’s Nashville and Kentucky offices. Caroline graduated magna cum laude from the University of Louisville Brandeis School of Law, where she completed law school in just two and a half years. While in law school she was on the University of Louisville Law Review (Volume 50) and was also a member of Law Students for Justice (law school division of AAJ). Caroline received her bachelor's degree from Western Kentucky University, where she graduated summa cum laude with a bachelor’s degree in Corporate and Organizational Communication and a minor in Marketing.

Caroline has been appointed class counsel in numerous cases including *Norman et al. v. Nissan North America, Inc. et al.*, Case No. 3:18-cv-534 (M.D.TN); *Weckworth et al. v. Nissan North America et al.*, Case No. 3:18-cv-588 (M.D.TN); *Cool v. L&B Oil and Gas, Inc.*, Case No. 16-CI-356 (Pike Co., Ky. Cir. Ct.), and *Appalachian Land Co. v. EQT Production Company*, Case No. 7:08-139-KKC (E.D. KY).

Caroline is a member of the American Association of Justice (AAJ) and is currently the Past Chair for the Railroad Section of AAJ. Caroline also serves on the Board of Governors for AAJ as the Revitalization Member for Tennessee. She is an active member and serves on the Executive Board of Directors of the Tennessee Trial Lawyers Association. She was recently included in *The Best Lawyers in America* 2020 Edition for Personal Injury Litigation, and was

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selected by the National Academy of Personal Injury Attorneys as a Top 10 Personal Injury Attorney in Tennessee Under Age 40, Top 40 Litigation Lawyer Under 40 for the state of TN in 2018, and as a “Top 40 Under 40” by The National Trial Lawyers. Additionally, she was appointed to the Tennessee Bench & Bar Committee.

Martha Geer

Senior Counsel

Judge Martha Geer has a combination of experience that few attorneys possess and clients find invaluable. She has practiced for more than two decades as a respected litigator and appellate advocate and served for more than 13 years as a rarely-reversed appellate judge. As a trial lawyer and board-certified appellate specialist, Judge Geer is known for obtaining cutting-edge and precedent-setting victories in a diverse set of practice areas, including consumer protection, ERISA, environmental, securities, labor and employment law, antitrust and trade regulation, contingent commercial litigation, and civil rights litigation.

Judge Geer received her B.A. summa cum laude from Bryn Mawr College and her J.D. with high honors from the University of North Carolina School of Law where she was a Morehead Fellow (a merit-based full scholarship) and served as Managing Editor of the North Carolina Law Review.

Following law school, Judge Geer joined Paul Weiss, one of the top law firms in the country where she represented corporate clients in class actions, shareholder litigation, and commercial disputes. Subsequently, she was a partner with two leading North Carolina plaintiffs’ firms (a founding member of the second firm) and represented plaintiffs in a wide range of complex civil litigation, including both class actions and individual cases.

She was first elected to the North Carolina Court of Appeals in 2002. In 2010, because of her reputation as a fair and impartial judge, she garnered strong bipartisan support that resulted in her winning re-election by a 20-point margin. During her tenure on the Court, Judge Geer heard more than 3,800 appeals, authored more than 1,350 opinions, and had her opinions reversed less than 2% of the time. She left the Court of Appeals to become a partner at Cohen Milstein Sellers & Toll LLP, a leading plaintiffs’ class action firm, and founded its Raleigh office. In October 2019, she joined Whitfield Bryson LLP.

Judge Geer is a highly sought-after teacher of continuing education programs for both judges and lawyers. As a trial and appellate lawyer, she has been regularly recognized in The Best Lawyers in America, most recently (2018, 2019, and 2020 eds.) in the areas of appellate practice and mass tort/class actions. Prior to joining the bench, she was selected by Business North Carolina as one of North Carolina’s “Legal Elite.”

Jeremy R. Williams

Attorney

Jeremy focuses his practice on class actions and other complex litigation. Since joining the firm in 2014, Jeremy has prosecuted cases nationwide against some of the largest companies in the world – ranging from cases involving millions of dollars in unpaid sales commissions by one of the largest technology companies in the Fortune 500 rankings to class actions for deceptive products and fraudulent pricing schemes against numerous Fortune 500 companies. Jeremy has also represented property owners in lawsuits related to defective construction of residential and commercial real estate. His work has led to the recovery of tens of millions of dollars for consumers.

Jeremy was named to the *Super Lawyers' Rising Stars* list as one of the top up-and-coming class action attorneys in North Carolina for 2018 through 2020. He is a member of the American Association for Justice as well as the North Carolina Advocates for Justice. He has served on the board of directors for several non-profit organizations and is currently the president of the Young Lawyers Division of the Wake County Bar Association. Jeremy graduated law school from Campbell University School of Law and earned his MBA from North Carolina State University. He received his bachelor's in sport and event management in 2010 from Elon University.

Patrick M. Wallace **Attorney**

Patrick is an associate in Whitfield Bryson LLP's litigation practice, with a focus on complex litigation, including consumer class actions, multi-district litigation, and qui tams. He focuses his nationwide practice on representing individuals and entities who have been the victims of defective products and corporate misconduct.

Patrick is entrusted by his clients and peers to successfully engage in every aspect of his cases, including arguing dispositive motions, formulating and executing discovery plans, working with experts, and conducting crucial depositions. Patrick takes on leadership roles in his cases, owing to his deep experience in nationwide litigation.

During his practice Patrick has served integral roles in several class actions. His recent experience includes litigating and settling North Carolina landlord-tenant eviction fee litigation cases against Mid-America Apartment Company, the NRP Group, and Southwood Realty Company. Patrick has also served important roles in nationwide litigation, including *In re Lumber Liquidators Chinese-Manufactured Laminate Flooring Durability Marketing and Sales Practices Litigation* (MDL No. 2743), *In re Windsor Windows Wood Clad Windows Products Liability Litigation* (MDL No. 2688), *Smith v. Floor and Decor Outlets of America, Inc.* (N.D. Ga.); and *In re Outer Banks Power Outage Litigation* (E.D.N.C.). Patrick also has extensive experience investigating and litigating qui tam cases, including through trial.

Patrick joined the firm in 2015 after completing a judicial clerkship with the Hon. Catharine R. Aron, Chief Judge for the United States Bankruptcy Court for the Middle District of North Carolina. He received his law degree from Wake Forest University School of Law, where he was a member of Moot Court and competed on the American Association for Justice trial team for two

years. At graduation Patrick was selected by the law faculty for induction to the Order of the Barristers. Prior to law school, Patrick received his Bachelor of Arts degree from the University of Illinois at Urbana-Champaign in 2009, and his Associate in Arts degree from Heartland Community College in 2007. In 2019 and 2020, Patrick was named to the Super Lawyers' Rising Stars list as one of the top young attorneys in North Carolina. Patrick is a member of the American Association for Justice and the North Carolina Association for Justice. Patrick maintains active involvement in his community through participating in his local church and in the Kiwanis Club of Raleigh.

Hunter Bryson Attorney

Hunter is an associate in Whitfield Bryson LLP's litigation practice, with a focus on defective construction products and construction defect claims. He primarily focuses on representing owners who have been the unfortunate victims of poor manufacturing processes, as well as homeowners and commercial developers whose properties have been subjected to shoddy construction practices.

Hunter joined Whitfield Bryson LLP's in 2016, after working as a law clerk for the firm, where he assisted in standing up for the rights of injured consumers on a daily basis.

Hunter earned his law degree from Campbell University School of Law in 2016. While at Campbell Law, he was elected as a justice to the honor court, a group leader for the peer mentor program, and a participant in the Campbell Law Connections program. Hunter earned his Bachelor of Arts degree from the University of North Carolina Chapel Hill, double majoring in Political Science and Economics. During the summer, Hunter interned for Themis Law Chambers in Cape Town, South Africa.

Harper T. Segui Senior Attorney

Harper T. Segui is an experienced litigator who focuses her practice on representing consumers in products liability litigation and other types of complex litigation across the country.

Harper attended the University of Central Florida where she obtained her Bachelor of Science before attending the Walter F. George School of Law at Mercer University. After graduating from law school in 2006, Harper practiced family law and general litigation in the Atlanta area for approximately a year before moving to Charleston, South Carolina.

Since moving to Charleston more than a decade ago, Harper's primary focus has been representing plaintiffs in complex litigation and class actions, with a particular focus on product defects. Locally, she has contributed to millions of dollars in settlements and was an active trial lawyer in a case that resulted in a multi-million dollar jury verdict in favor of homeowners for a developer's shoddy construction of townhomes in South Carolina. Nationally, she has several times been appointed by courts to serve on Plaintiffs' Steering Committees, and has served as co-

class counsel in several class actions. Likewise, Harper has enjoyed playing active roles in multi-district litigation involving defective products. In the successful resolution of many of those cases, she contributed to millions of dollars in settlement money recovered for consumer.

Since 2013, Harper has been regularly selected to *Super Lawyers* as a Top-Rated Attorney in the areas of “Class Action & Mass Torts.” She has co-authored several publications on product liability cases, and has been a lecturer on complex legal issues. Harper is a member of the American Association for Justice and the Public Justice Foundation.

Drew Hathaway **Attorney**

As an attorney at Whitfield Bryson LLP, Drew Hathaway focuses on representing consumers in complex litigation. His primary focus is on product liability and consumer protection class actions both in the United States and internationally throughout Europe. Along with product liability cases, Drew currently represents the elderly in North Carolina’s first ever class action against an adult care home chain for understaffing their facilities. In addition to representing harmed consumers against some of the largest corporations in the world, Drew also represents commercial real estate owners in lawsuits related to defective construction.

Drew graduated from The University of North Carolina at Chapel Hill in 2003. While studying, he was a member of the varsity swim team at Chapel Hill. Drew earned his J.D. from Campbell University School of Law in 2007. While at Campbell, Drew was a member of the National Moot Court Team, inducted into the Order of Old Kivett and was an editor for the Campbell Law Observer.

Drew spent the first eight years of his career practicing as a defense lawyer with a primary focus on medical malpractice and commercial litigation. Drew has extensive trial experience and has received numerous honors as a trial attorney including recognition as North Carolina Super Lawyers Rising Stars, a peer selection for the top 2.5% of North Carolina Lawyers under the age of 40.

Since 2007, Drew has been on the board of directors for Vidas De Esperanza. Vidas is a 501(c)(3) non-profit that provides free health care and educational opportunities to the underserved in North Carolina and in Mexico. Drew is a member of the Public Justice Foundation, the American Association for Justice, the North Carolina Advocates for Justice, the Wake County Bar Association and the North Carolina Bar Association.

Erin Ruben **Attorney**

Erin Ruben focuses her practice on civil litigation, though she brings a wide range of experience in both civil and criminal law. Erin began her career in 2006 as a public defender with Virginia’s Indigent Defense Commission, where she represented the county’s most vulnerable defendants in criminal matters before judges and juries in the district and circuit courts of Fairfax

County and in the Virginia Court of Appeals. After relocating to North Carolina in 2009, she began her civil litigation practice, primarily representing plaintiffs in medical malpractice, personal injury, and employment matters. From 2015-2017, she also owned and operated a small business with a retail location in Raleigh, NC, which provided her with a wealth of practical experience she has been able to apply to her practice. Erin is passionate about protecting and defending the rights and dignity of her clients through zealous, compassionate legal advocacy.

Erin earned her J.D. from Wake Forest University School of Law in 2006, where she was a member of the Moot Court Board. Erin obtained a Bachelor of Business Administration (B.B.A.) in Marketing from the University of Georgia in 2003, in addition to a Certificate in Personal and Organizational Leadership from UGA's Institute for Leadership Advancement. While at UGA, Erin was honored to be named a Leonard Leadership Scholar, recognizing her academic achievement and demonstrated leadership.

Devon Landman **Attorney**

Devon Landman is an experienced litigator who focuses her practice on civil litigation, criminal defense, and personal injury. As a former prosecutor, Devon previously fought for those who have been wronged by crimes. She now diligently, meticulously, and vigorously fights for those who have been wronged by others' negligence. She also passionately defends the rights of those accused of crimes and helps secure a fair outcome that allows them to move on with their lives.

Devon earned her undergraduate degree in Communications and Information Sciences from the University of Alabama in 2014. She earned her Juris Doctor degree from Belmont University College of Law in 2017. While in law school, Devon worked at both the Federal Public Defender's Office in downtown Nashville and the State Attorney's Office in the 18th Judicial Circuit in Viera, Florida.

After graduating law school, Devon joined the Florida Bar in September 2017. Upon licensure, she was an Assistant State Attorney for the State of Florida, prosecuting crimes on behalf of the State. During her time as an Assistant State Attorney, she served on the Board of Directors for the Brevard County Bar Association's Young Lawyers Division.

In the summer of 2019, Devon moved back to Nashville and became licensed in the State of Tennessee. She is a member of the Tennessee Bar Association and its Young Lawyers Division, the Nashville Bar Association, the Tennessee Trial Lawyers Association, and Lawyers' Association for Women – Marion Griffin Chapter. She is also a member of the American Association of Justice (AAJ).

Alex Straus **Attorney**

Alex R. Straus was born and raised in New York, NY. Alex is currently licensed to practice law in California, Massachusetts, New York, Rhode Island, and South Carolina. For more than a

decade, he has represented consumers, labor unions, and municipalities throughout the United States in practice areas ranging from complex tort and personal injury to antitrust and securities litigation. Prior to joining Whitfield Bryson LLP, Alex spent the majority of his legal career as a litigation attorney with Motley Rice LLC after a long career as an investigative journalist and author. In 2013, Alex authored an *amicus curiae* brief filed in the Supreme Court of the United States in support of a shipyard worker who died as a result of asbestos exposure.

An avid writer, Alex co-authored with legendary trial lawyer, Ron Motley, a chapter in the book *Pathology of Asbestos-Related Diseases*, which was published in 2014. Alex has also authored two books, *Medical Marvels: The 100 Most Important Medical Advances* (Prometheus Books, 2006) and *Guerrilla Golf: The Complete Guide to Playing Golf on Mountains, Pastures, City Streets and Everywhere But the Course* (Rodale Press, 2006). The author of more than 100 nationally published feature-length articles, Alex won the New York Press Association Best Sports Feature award in 1999.

As a law student at Roger Williams University School of Law, Alex was the 2009 recipient of the Kathleen Brit Memorial Prize for Alternative Dispute Resolution and served as law clerk for the New England Patriots, working with the team's General Counsel on real estate acquisitions, environmental compliance and collective bargaining issues. Alex attended Rollins College in Winter Park, Florida and Columbia University's School of International and Public Affairs in New York, New York.

Notable Whitfield Bryson LLP Class Action Cases

Antitrust

In re: TFT-LCD (Flat Panel) Antitrust Litigation, No. 3:07-cv-01827, MDL No. 1827 (N.D. Cal.) (combined settlement totaling nearly \$1.1 billion in suit alleging the illegal formation of an international cartel to restrict competition in the LCD panel market) (2012).

Appliances

Ersler, et. al v. Toshiba America et. al, No. 07- 2304 (D.N.J.) (settlement of claims arising from allegedly defective television lamps) (2009).

Maytag Neptune Washing Machines (class action settlement for owners of Maytag Neptune washing machines).

Stalcup, et al. v. Thomson, Inc. (Ill. Cir. Ct.) (\$100 million class settlement of claims that certain GE, PROSCAN and RCA televisions may have been susceptible to temporary loss of audio when receiving broadcast data packages that were longer than reasonably anticipated or specified) (2004).

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Hurkes Harris Design Associates, Inc., et al. v. Fujitsu Computer Prods. of Am., Inc. (settlement provides \$42.5 million to pay claims of all consumers and other end users who bought certain Fujitsu Desktop 3.5” IDE hard disk drives) (2003).

Turner v. General Electric Company, No. 2:05-cv-00186 (M.D. Fla.) (national settlement of claims arising from allegedly defective refrigerators) (2006).

Automobiles

In re General Motors Corp. Speedometer Prods. Liability Litig., MDL 1896 (W.D. Wash.) (national settlement for repairs and reimbursement of repair costs incurred in connection with defective speedometers) (2007).

Baugh v. The Goodyear Tire & Rubber Company (class settlement of claims that Goodyear sold defective tires that are prone to tread separation when operated at highway speeds; Goodyear agreed to provide a combination of both monetary and non-monetary consideration to the Settlement Class in the form of an Enhanced Warranty Program and Rebate Program) (2002).

Lubitz v. Daimler Chrysler Corp., No. L-4883-04 (Bergen Cty. Super. Ct, NJ 2006) (national settlement for repairs and reimbursement of repair costs incurred in connection with defective brake system; creation of \$12 million fund; 7th largest judgment or settlement in New Jersey) (2007).

Berman et al. v. General Motors LLC, Case No. 2:18-cv-14371 (S.D. Fla.) (Co-Lead Counsel; national settlement for repairs and reimbursement of repair costs incurred in connection with Chevrolet Equinox excessive oil consumption).

Civil Rights

In re Black Farmers Discrimination Litigation, Case No. 1:08-mc-00511 (D.D.C.) (\$1.25 billion settlement fund for black farmers who alleged U.S. Department of Agriculture discriminated against them by denying farm loans) (2013).

Bruce, et. al. v. County of Rensselaer et. al., Case No. 02-cv-0847 (N.D.N.Y.) (class settlement of claims that corrections officers and others employed at the Rensselaer County Jail (NY) engaged in the practice of illegally strip searching all individuals charged with only misdemeanors or minor offenses) (2004).

Commercial

In re: Outer Banks Power Outage Litigation, 4:17-cv-141 (E.D.N.C) (Co-Lead Counsel; \$10.35 million settlement for residents, businesses, and vacationers on Hatteras and Ocracoke Islands who were impacted by a 9-day power outage) (2018)

Construction Materials

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Cordes et al v. IPEX, Inc., No. 08-cv-02220-CMA-BNB (D. Colo.) (class action arising out of defective brass fittings; court-appointed member of Plaintiffs' Steering Committee) (2011).

Elliott et al v. KB Home North Carolina Inc. et al 08-cv-21190 (N.C. Super. Ct. Wake County) (Lead Counsel; class action settlement for those whose homes were constructed without a weather-resistant barrier)(2017)

In re: Pella Corporation Architect and Designer Series Windows Marketing, Sales Practices and Products Liability Litigation, MDL No. 2514 (D.S.C.)(class action arising from allegedly defective windows; Court-appointed Co-Lead Counsel).

In re MI Windows and Doors, Inc., Products Liability Litigation, MDL No. 2333 (D.S.C) (National class action settlement for homeowners who purchased defective windows; Court-appointed Co-Lead Counsel).

In re: Atlas Roofing Corporation Chalet Shingle Products Liability Litig., MDL No. 2495 (N.D. Ga.) (class action arising from allegedly defective shingles; Court-appointed Co-Lead Counsel).

Helmer et al. v. Goodyear Tire & Rubber Co., No. 12-cv-00685-RBJ (D. Colo. 2012) (class action arising from allegedly defective radiant heating systems; Colorado class certified, 2014 WL 3353264, July 9, 2014)).

In re: Zurn Pex Plumbing Products Liability Litigation, No. 0:08-md-01958, MDL No. 1958 (D. Minn.) (class action arising from allegedly plumbing systems; member of Executive Committee; settlement) (2012).

Hobbie, et al. v. RCR Holdings II, LLC, et al., No. 10-1113 , MDL No. 2047 (E.D. La.) (\$30 million settlement for remediation of 364 unit residential high-rise constructed with Chinese drywall) (2012).

In re: Chinese Manufactured Drywall Products Liability Litigation, No. 2:09-md-02047, MDL No. 2047 (E.D. La.) (litigation arising out of defective drywall) (appointed Co-Chair, Insurance Committee) (2012).

Galanti v. Goodyear Tire & Rubber Co., No. 03-209 (D.N.J. 2003) (national settlement and creation of \$330 million fund for payment to owners of homes with defective radiant heating systems) (2003).

In re Synthetic Stucco Litig., Civ. Action No. 5:96-CV-287-BR(2) (E.D.N.C.) (member of Plaintiffs' Steering Committee; settlements with four EIFS Manufacturers for North Carolina homeowners valued at more than \$50 million).

In re Synthetic Stucco (EIFS) Prods. Liability Litig., MDL No. 1132 (E.D.N.C.) (represented over 100 individuals homeowners in lawsuits against homebuilders and EIFS manufacturers).

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Posey, et al. v. Dryvit Systems, Inc., Case No. 17,715-IV (Tenn. Cir. Ct) (Co-Lead Counsel; national class action settlement provided cash and repairs to more than 7,000 claimants) (2002).

Sutton, et al. v. The Federal Materials Company, Inc., et al, No. 07-CI-00007 (Ky. Cir. Ct) (Co-Lead Counsel; \$10.1 million class settlement for owners of residential and commercial properties constructed with defective concrete).

Staton v. IMI South, et al. (Ky. Cir. Ct.) ((Co-Lead Counsel; class settlement for approximately \$30 million for repair and purchase of houses built with defective concrete).

In re Elk Cross Timbers Decking Marketing, Sales Practices and Products Liability Litigation, No. 15-cv-0018, MDL No. 2577 (D.N.J.) (Lead Counsel; national settlement to homeowners who purchased defective GAF decking and railings).

Bridget Smith v. Floor and Decor Outlets of America, Inc., No. 1:15-cv-4316 (N.D. Ga.) (Co-Lead Counsel; National class action settlement for homeowners who purchased unsafe laminate wood flooring).

In re Lumber Liquidators Chinese-Manufactured Flooring Products Marketing, Sales Practices and Products Liability Litigation MDL No. 1:15-md-2627 (E.D.Va.) (Formaldehyde case; \$36 million national class action settlement for member who purchased a certain type of laminate flooring).

In re Lumber Liquidators Chinese-Manufactured Laminate Flooring Durability Marketing, Sales Practices Litigation MDL No. 1:16-md-2743 (E.D.Va.) (Co-Lead Counsel; Durability case; \$36 million national class action settlement for member who purchased a certain type of laminate flooring).

In re Windsor Wood Clad Window Products Liability Litigation MDL No. 2:16-md-02688 (E.D. Wis.) (National class action settlement for homeowners who purchased defective windows; Court-appointed Lead Counsel).

In re Allura Fiber Cement Siding Products Liability Litigation MDL No. 2:19-md-02886 (D.S.C.) (class action arising from allegedly defective cement board siding; Court-appointed Lead Counsel).

Environmental

Nnadili, et al. v. Chevron U.S.A., Inc, No. 02-cv-1620 (D.D.C.) (\$6.2 million settlement for owners and residents of 200 properties located above underground plume of petroleum from former Chevron gas station) (2008).

In re Swanson Creek Oil Spill Litigation, No. 00-1429 (D. Md.) (Lead Counsel; \$2.25 million settlement of litigation arising from largest oil spill in history of State of Maryland) (2001).

Fair Labor Standards Act/Wage and Hour

Craig v. Rite Aid Corporation, Civil No. 08-2317 (M.D. Pa.) (FLSA collective action and class action settled for \$20.9 million) (2013).

Stillman v. Staples, Inc., Civil No. 07-849 (D.N.J. 2009) (FLSA collective action, plaintiffs' trial verdict for \$2.5 million; national settlement approved for \$42 million) (2010).

Lew v. Pizza Hut of Maryland, Inc., Civil No. CBB-09-CV-3162 (D. Md.) (FLSA collective action, statewide settlement for managers-in-training and assistant managers, providing recompense of 100% of lost wages) (2011).

Financial

Roberts v. Fleet Bank (R.I.), N.A., Civil Action No. 00-6142 (E. D. Pa.) (\$4 million dollar settlement on claims that Fleet changed the interest rate on consumers' credit cards which had been advertised as "fixed.") (2003).

Penobscot Indian Nation et al v United States Department of Housing and Urban Development, N. 07-1282 (PLF) (D.D.C. 2008) (represented charitable organization which successfully challenged regulation barring certain kinds of down-payment assistance; Court held that HUD's promulgation of rule violated the Administrative Procedure Act) (2008).

Impact Fees

Town of Holly Springs, No. 17-cvs-6244, 17-cvs-6245, 18-cvs-1373 (Wake Co., NC) (Court appointed Class Counsel; Class action settlement with a \$7.9 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the town) (2019).

Larry Shaheen v. City of Belmont, No. 17-cvs-394 (Gaston Co., NC) (Court appointed Class Counsel; Class action settlement with a \$1.65 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the city) (2019).

Upright Builders Inc. et al. v. Town of Apex, No. 18-cvs-3720 & 18-cvs-4384, (Wake Co., NC) (Court appointed Class Counsel; Class action settlement with a \$15.3 million fund for builders and developers to recover improper capacity replacement and transportation paid fees to the town) (2019).

Mayfair Partners, LLC et al. v. City of Asheville, No. 18-cvs-04870 (Buncombe County) (Court appointed Class Counsel; Class action settlement with a \$1,850,000 million fund for builders and developers to recover improper impact fees paid to the city) (2020).

Shenandoah Homes, LLC v. Town of Clayton, No. 19-cvs-640 (Johnston County) (Court appointed Class Counsel; Class action settlement with a \$2.7 million fund for builders and developers to recover improper impact fees paid to the town) (2020).

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Brookline Homes LLC v. City of Mount Holly, Gaston County file no. 19-cvs-1163 (Gaston County) (Court appointed Class Counsel; Class action settlement with a \$483,468 fund for builders and developers to recover improper impact fees paid to the city) (2020).

Eastwood Construction, LLC et. al v. City of Monroe, Union County file nos. 18-CVS-2692 (Union County) (Court appointed Class Counsel; Class action settlement with a \$1,750,000 million fund for builders and developers to recover improper impact fees paid to the city) (2020).

Insurance

Young, et al. v. Nationwide Mut. Ins. Co, et al., No. 11-5015 (E.D. Ky.) (series of class actions against multiple insurance companies arising from unlawful collection of local taxes on premium payments; class certified and affirmed on appeal, 693 F.3d 532 (6th Cir., 2012); settlements with all defendants for 100% refund of taxes collected) (2014).

Nichols v. Progressive Direct Insurance Co., et al., No. 2:06cv146 (E.D. Ky.) (Class Counsel; class action arising from unlawful taxation of insurance premiums; statewide settlement with Safe Auto Insurance Company and creation of \$2 million Settlement Fund; statewide settlement with Hartford Insurance Company and tax refunds of \$1.75 million) (2012).

Privacy/Data Breach

In Re: U.S. Office of Personnel Management Data Security Breach Litigation, No. 15-1393 (ABJ), MDL No. 2664 (D.D.C.) (court appointed interim Liaison Counsel).

In re Google Buzz Privacy Litigation, No. 5:10-cv-00672 (N.D. Cal.) (court-appointed Lead Class Counsel; \$8.5 million cy pres settlement) (2010).

In re: Dept. of Veterans Affairs (VA) Data Theft Litig., No. 1:2006-cv-00506, MDL 1796 (D.D.C.) (Co-Lead counsel representing veterans whose privacy rights had been compromised by the theft of an external hard drive containing personal information of approximately 26.6 million veterans and their spouses; creation of a \$20 million fund for affected veterans and a cy pres award for two non-profit organizations) (2009).

In re: Adobe Systems Inc. Privacy Litigation, No. 5:13-cv-05226 (N.D. Cal. 2015) (settlement requiring enhanced cyber security measures and audits) (2015).

Exhibit C



**GREG
COLEMAN LAW**

Helping People, Changing Lives

FIRM RESUME

GREG COLEMAN LAW PC

A Professional Corporation

First Tennessee Plaza

800 S. Gay Street, Suite 1100

Knoxville, TN 37929



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THE FIRM

Greg Coleman Law PC is an AV rated, full-service plaintiffs' law firm composed of a carefully assembled, talented group of 13 attorneys with sound judgment, exceptional skills, and broad expertise. The firm's goal is simple: provide high quality legal services with innovative and progressive approaches to the law. To this end, the firm's attorneys recognize the importance of courtroom experience at all levels and the value of a diverse legal practice. Above all else, it is our commitment to aggressively fight for the rights of our clients that sets the firm apart.

OUR ACCOLADES



PRACTICE AREAS

- Class Actions
- Consumer Protection/Consumer Rights
- ERISA Litigation
- False Advertising
- Multi-District Litigation/Mass Actions
- Federal and State Appeals
- Breach of Contract & UCC Disputes
- Business Litigation
- Chemical-Related Cancers & Diseases
- Dangerous Drugs & Medical Devices
- Fraud/Misrepresentation
- Securities Litigation
- FLSA Litigation
- Auto, Trucks & Motorcycle Accidents
- Insurance Coverage Disputes
- Medical Malpractice
- Toxic Tort



REPRESENTATIVE CASES

Adelman v. Rheem Manufacturing Company (D. Ariz.): Co-lead counsel in product defect class action.

Ajose v. Interline Brands, Inc. (M.D. Tenn.): Counsel in product defect class action.

Anderson v. Ford Motor Company (W.D. Missouri): Co-lead counsel in vehicle safety defect class action.

Berman v. General Motors (S.D. Fla.): Co-lead counsel in vehicle defect class action.

Chapman v. TriStar Products, Inc. (N.D. Ohio): Lead counsel in multistate defective product class action.

Chason v. Capital City Bank (Gadsden Cty. Cir. Ct., Fla.): Co-lead counsel in overdraft fee class action.

Clark v. Lumber Liquidators (N.D. Ga.): Co-lead counsel in product defect class action.

Curtis v. Alcoa (E.D. Tenn.): Co-lead counsel in ERISA class action.

Davis v. Westgate Planet Hollywood Las Vegas (D. Nev.): Co-lead counsel in a Fair Labor Standards Act case.

Dickerson v. York International Corporation (M.D. Penn.): Co-lead counsel in product defect class action.

Feuquay v. Teachers Credit Union (St. Joseph Cty., Cir. Ct., Ind.): Co-lead counsel in overdraft fee class action.

Floyd v. American Honda Motor Co., Inc. (C.D. Cal., 9th Circuit Court of Appeals): Co-lead counsel in vehicle safety defect class action.

Fultineer v. Lumber Liquidators (W.D. Ky.): Co-lead counsel in product defect class action.

Glenn v. Hyundai Motors America (C.D. Cal.): Co-lead counsel in vehicle safety defect class action.

Harding v. Midsouth Bank (W.D. La.): Co-lead counsel in overdraft fee class action.

Hardwick v. Fluidmaster, Inc. (D.N.H.): Co-lead counsel in product defect class action.

Hatmaker v. Consolidated Nuclear Security, LLC (E.D. Tenn.): Lead counsel in ERISA class action.



Hindsman v. General Motors (N.D. Cal.): Co-lead counsel in vehicle defect class action.

Hirst v. Skywest Airlines, Inc. (N.D. Ill., 7th Circuit Court of Appeals): Co-lead counsel in employee wage and hour class action.

Hungerman v. Fluidmaster, Inc. (W.D. Penn.): Co-lead counsel in multistate product defect class action.

Hurd v. America's Collectibles Network, Inc. (Knox Cty. Cir. Ct., Tenn.): Co-lead counsel in consumer protection and false advertising class action.

Jammal v. American Family Insurance Company (N.D. Ohio): Co-lead counsel in ERISA class action.

Jenkins v. Lawrence E. Keeble, Marcelo Pinto and Star Transportation, Inc. (Davidson Cty. Cir. Ct., Tenn.): Lead counsel in personal injury action which led to the single largest auto negligence verdict in Tennessee for 2009.

Johnson v. Direct Shopping Network, Inc. (L.A. Sup. Ct., Cal.): Co-lead counsel in consumer protection and false advertising class action.

Johnson v. Nissan North America, Inc. (N.D. Cal.): Co-lead counsel in vehicle safety defect class action.

Klug v. Watts Regulator Co. (D. Neb.): Co-lead counsel in product defect class action.

Kondash v. Kia Motors America (S.D. Ohio): Co-lead counsel in vehicle safety class action.

Krause v. MB Financial Bank (Cook Cty. Cir. Ct., Ill.): Co-lead counsel in overdraft fee class action.

Lewis v. Allegheny Ludlum Corp. (W.D. Penn.): Co-lead counsel in ERISA class action.

Lowther v. AK Steel (S.D. Ohio): Co-lead counsel in ERISA class action.

Meadow v. NIBCO, Inc. (M.D. Tenn.): Counsel in product defect class action.

Meek v. Skywest Airlines, Inc. (N.D. Cal.): Co-lead counsel in employee wage and hour class action.

Merkner v. AK Steel (S.D. Ohio): Co-lead counsel in ERISA class action.

Michelhaugh v. Consolidated Nuclear Security, LLC (Anderson County Tenn. Cir. Ct.): Lead counsel in breach of contract class action.

Moreno v. Toyota Motor Sales (C.D. Cal.): Co-lead counsel in vehicle safety defect class action.

Mull v. Glacier Bank (Lincoln Cty. Cir. Ct., Mont.): Co-lead counsel in overdraft fee class action.



Muzingo v. Bank of the Ozarks (Pulaski Cty. Cir. Ct., Ark.): Co-lead counsel in overdraft fee class action.

O'Keefe v. Pick Five Imports, Inc. (M.D. Fla.): Co-Lead counsel in defective product class action.

Price v. L'Oreal USA Inc. (S.D. N.Y.): Co-lead counsel in false advertising class action.

Roberts v. Electrolux Home Products, Inc. (C.D. Cal.): Co-lead counsel in multistate safety defect class action.

Rysewyk v. Sears Holding Corporation (N.D. Ill.): Co-lead counsel in product defect class action.

Samuel v. Chrysler Group LLC (C.D. Cal.): Co-lead counsel in multistate vehicle safety defect class action.

Sanborn v. Nissan North America, Inc. (S.D. Fla.): Co-lead counsel in vehicle safety defect class action.

Sanchez v. General Motors (N.D. Ill.): Co-lead counsel in vehicle defect class action.

Satterfield v. Alcoa, Inc., 266 S.W. 3d 347 (Tenn. 2008): Co-lead counsel in Tennessee Supreme Court case in which the Supreme Court ruled that a duty is owed by Alcoa to a nonemployee household member as it relates to the household member's contraction of mesothelioma.

Stedman v. Mazda Motor Corp. (C.D. Cal.): Co-lead counsel in multistate vehicle safety defect class action.

Swift v. QNB Bank (Bucks Cty Cir. Ct., Penn.): Co-lead counsel in overdraft fee class action.

Tanasi v. New Alliance Bank (W.D.N.Y.): Co-lead counsel in overdraft fee class action.

Tapp v. Skywest Airlines, Inc. (N.D. Ill.): Co-lead counsel in employee wage and hour class action.

Vickery v. Lumber Liquidators (E.D. Tenn.): Co-lead counsel in product defect class action.

Watson v. Westgate Resorts, Inc. (E.D. Tenn.): Co-lead counsel in a Fair Labor Standards Act case.

West v. East Tennessee Pioneer Oil Co. (Tenn.): A Tennessee Supreme Court case in which the Court ruled a convenience store had a legal duty to the plaintiffs for selling gas to an obviously intoxicated driver.

White v. Nutribullet, LLC (C.D. Cal.): Lead counsel in product defect class action.

Williams v. FCA US LLC (W.D. Missouri): Co-lead counsel in vehicle safety defect class action.



Gregory F. Coleman | Founder and Managing Partner



Greg Coleman is the Founder and Managing Partner of Greg Coleman Law PC with 30 years of trial and appellate experience. Greg received his B.A. with highest honors and distinction from Jacksonville State University in 1986. He attended The University of Tennessee College of Law, graduating in 1989. In addition to distinguishing himself academically, Greg was a member of the National Trial Moot Court Team, was the recipient of the American Jurisprudence Award for National Trial Team and was listed in Who's Who Among Rising Young Americans. In addition, the College of Law bestowed upon Greg the honor of inclusion into the National Order of Barristers for outstanding oral advocacy and trial skills.

Greg's practice focuses on class actions, products liability, medical malpractice, personal injury, complex multi-district litigation, toxic torts, premises liability, ERISA, ERISA class actions, drug and medical device litigation, and workers' compensation.

He was co-lead counsel in a defective products case against Electrolux in which he and co-counsel successfully obtained a settlement on behalf of a class of more than one million members regarding defectively manufactured dryers. The settlement resulted in an expected utilization

settlement value of over \$35 million.

Greg was co-lead counsel in a series of automobile defect class actions against General Motors in Florida, Illinois, and California, in which he and co-counsel successfully obtained a \$42 million settlement on behalf of a class of 1.6 million consumers regarding excessive oil consumption.

He was lead trial counsel in an ERISA class action against AK Steel Corporation in which he successfully obtained a \$178.6 million settlement on behalf of a class of over 3,000 retirees of AK Steel's Butler Works Plant in Pennsylvania in 2011. Excerpts from the final approval hearing before Judge Black:

"[T]he class has been enormously well represented by the attorneys in this case. I started with the observation that this was a historic moment. I genuinely believe that.

"The plaintiffs and the members of the class have been enormously well represented by counsel."

"[T]here is no doubt that the settlements herein represent excellent result for the class members and obviate all risk of continued litigation."

"[T]he Court finds that the hourly and salaried settlements represent excellent result for the class members and provides them with a substantial benefit."

"I reach the conclusion based on acknowledging the extraordinary benefit achieved for the class, the high level of value of these plaintiffs' counsel's services. The lawyers here are excellent, highly regarded, and their service has brought great value to the class."



"I acknowledge this was a complex and demanding case involving a great deal of work and that the end result occurred largely, if not fully, attributable to the diligence, determination, hard work of plaintiffs' counsel, who were vigorously contested, as the company was represented by extraordinary lawyers.

Judge Timothy S. Black, U.S.D.C. S.D. Ohio.

Greg was also lead trial counsel in an ERISA class action case against AK Steel Corporation in which he successfully obtained a \$15.8 million settlement on behalf of a class of over 250 retirees of AK Steel's Zanesville Works Plant in Ohio in 2012.

He was lead counsel in a week-long trucking accident trial in which he obtained the largest negligence verdict in the state of Tennessee for 2009. *Jenkins v. Keeble*, Davidson County.

Greg Coleman has been and is currently involved in complex product liability and drug product liability litigation and has tried more than one hundred jury trials and countless other bench trials during his career. He has tried jury trials throughout the country and has been admitted *pro hac vice* in complex matters nationwide, including a six-week long jury trial in Sacramento, California, for which he was lead counsel.

Greg is admitted to practice in the following courts:

- State Courts of Tennessee
- Tennessee Supreme Court
- United States Supreme Court
- United States District Court, Eastern District of Tennessee
- United States District Court, Middle District of Tennessee
- United States District Court, Western District of Tennessee
- United States District Court, District of Colorado
- United States District Court, Central District of Illinois
- United States District Court, Northern District of Illinois
- United States District Court, Southern District of Illinois
- United States District Court, Southern District of Indiana
- United States District Court, Eastern District of Michigan
- United States District Court, Eastern District of Missouri
- United States District Court, District of Nebraska
- United States District Court, Western District of New York
- United States District Court, Eastern District of Wisconsin
- United States Court of Appeals for the Second Circuit
- United States Court of Appeals for the Third Circuit
- United States Court of Appeals for the Fourth Circuit
- United States Court of Appeals for the Fifth Circuit
- United States Court of Appeals for the Sixth Circuit
- United States Court of Appeals for the Seventh Circuit
- United States Court of Appeals for the Ninth Circuit
- United States Court of Federal Claims

He is certified as a Civil Trial Advocacy Specialist and as a Civil Pretrial Advocacy Specialist by the National Board of Trial Advocacy. Greg is a member of the American Bar Association, Tennessee Bar Association, and is also a member of the Knoxville Bar Association.

Greg is listed in Best Lawyers in America in two separate categories and has been named one of the Top 100 Trial Lawyers by the American Trial Lawyers Association. He was named as Best Lawyers of America Lawyer of the Year in Products Liability and was also named by the U.S. News and World Report as one of the best lawyers and law firms in the country. Additionally, Greg has been recognized as one of Knoxville's Top Attorneys in eight separate categories. Greg Coleman Law is and has been ranked among the "Best Law Firms" by *U.S. News & World Report* and *Best Lawyer*. Greg Coleman Law also received the 2014 and 2015 Litigator Awards from the Trial Lawyers Board of Regents.

Greg is proud to have been recognized by his colleagues through nomination to the Martindale-Hubbell Bar Register of Preeminent Lawyers which includes only those select law practices that have earned the highest rating in the Martindale-Hubbell Law Directory and have been designated by their colleagues as preeminent in their field. He is AV rated by the Martindale Hubbell Legal Rating System Judicial Edition and Peer Review Edition, and is a Charter



Member and Senior Fellow of the Litigation Counsel of America, "a trial lawyer honorary society established to reflect the new face of the American Bar with limited membership representing less than one-half of one percent of American lawyers and is by invitation only." He is a Mid-South Super Lawyer representing the top five percent of Arkansas, Mississippi, and Tennessee attorneys. Greg is a lifetime member of the prestigious Multi-Million Dollar Advocates Forum, an organization whose members are limited to attorneys who have won multi-million dollar verdicts and settlements. He is a Charter member of the Knoxville Chapter of the American Inns of Court and a member of the American Association for Justice and Public Justice. Greg has been featured in Newsweek Magazine in their Showcase of Nationwide Top Attorneys.

Greg has served as a guest lecturer and speaker on Advanced Trial Advocacy and at national seminars, including those sponsored by the Tennessee Bar Association, the National Business Institute, and Mass Torts Made Perfect. He has lectured extensively for many years on topics such as advanced trial tactics and strategy and complex litigation matters. He has authored published materials regarding advanced trial strategy, ethics seminars, as well as numerous other publications for CLE seminars at which he has lectured.

Greg has been actively involved in civil and charitable activities, having served for many years on the Executive Board of Trustees for the Baptist Health System, including the Baptist Hospital of East Tennessee and related entities, and has been involved in many legal aid and pro bono projects in the Knoxville area. Greg and his firm are donors to the annual Mission of Hope Christmas Barrel drive providing warm coats for the children of rural Appalachia. In support of the Knoxville Academy of Medicine and Knoxville Academy of Medicine Alliance's Conversation Ready Project, Greg performed at the "A Little More Conversation" event. The Conversation Ready Project is a program of the Knoxville Academy of Medicine Foundation and was formed to ensure that everyone's end-of-life wishes are expressed and respected.

Reported Cases:

West v. East Tennessee Pioneer Oil Co., 172 S.W. 3d 545 (Tenn. 2005), which is a Tennessee Supreme Court case in which the Supreme Court ruled a convenience store had a legal duty to the plaintiffs Gary West and Michelle Richardson (Greg's clients) for selling gas to an obviously intoxicated driver, who then had an accident with Gary West and Michelle Richardson on the roadway. This case was the first case to find that a convenience store had a legal duty to a driver on the roadway (Gary West and Michelle Richardson) for selling gas to an obviously intoxicated driver who then had an accident with Greg's clients.

Satterfield v. Alcoa, Inc., 266 S.W. 3d 347 (Tenn. 2008), which is a Tennessee Supreme Court case in which the Supreme Court ruled that a duty is owed by Alcoa to a nonemployee household member as it relates to the household members contraction of mesothelioma.

Merkner v. AK Steel, 2010 U.S. Dist. LEXIS 12742, 48 BNA 1923.

Lowther v. AK Steel, 2012 U.S. Dist. LEXIS 181476, 54 BNA 1931.



Adam A. Edwards | Senior Attorney



Adam Edwards is a Senior Attorney at Greg Coleman Law, and acts as the lead attorney on many of the firm's serious personal injury cases. He also serves as a primary litigator on many of the firm's class action, multi-district litigation, and defective product cases.

He attended The University of Tennessee where he received his undergraduate degree in political science and served as a field office intern for United States Senator and former Senate Majority Leader, Dr. Bill Frist.

After graduating from UT, Mr. Edwards was accepted into the Juris Doctor program at the Washburn University School of Law where he was awarded an academic merit scholarship after his first year of coursework. While at Washburn, Adam excelled in oral advocacy and was selected as the President of the Moot Court Counsel on Oral Advocacy. He was also selected as a member of the

Order of Barristers. He received his JD after graduating with Dean's Honors in 2000.

Adam's formal legal career started when he accepted a position as an Attorney at Husch Blackwell (formerly Blackwell Sanders) in Kansas City, Missouri in 2000. During the first four years of his legal career, Mr. Edwards successfully defended a number of well-known insurance companies and corporations in a wide range of litigation matters.

Today, Mr. Edwards utilizes his extensive trial experience and diverse background to advocate for personal injury victims and consumers who have suffered damages resulting from dangerous and defective products.

Mr. Edwards was selected by fellow members of the Knoxville Bar as a "Top Attorney" in CITYVIEW Magazine's annual Top Attorney's issue. He was selected as a Top Attorney for a second time in 2010. In 2017, Mr. Edwards was named one of the Top 100 Trial Lawyers by the American Trial Lawyers Association. He was also selected for membership into the Million Dollar Advocates Forum, an honor reserved for trial lawyers who have secured a settlement or verdict in excess of one million dollars.

Practice Areas: Class Actions, Consumer Protection/Consumer Rights, Motor Vehicle Accident Litigation, Multi District Litigation, Business Litigation, Medical Malpractice, Workers' Compensation, Nursing Home Neglect, Personal Injury, Product Liability, Wrongful Death



Mark E. Silvey | Senior Attorney



Mark E. Silvey is a Senior Attorney at Greg Coleman Law, and focuses primarily on the firm's complex litigation and class action cases. Mark is a native of Knoxville, Tennessee growing up in the Halls community, with family ties going back several generations. Mark's grandfather, Adrian Burnett, served on the Knox County School Board for a number of years. Mark received a bachelor's degree in history from the University of Tennessee in 1984, concentrating in the study of medieval Japan and the early 20th century in the United States. He was an invited participant in the Honors History program in 1983. He also served on the Dean's Student Advisory Council for the College of Arts and Sciences.

Mark received his law degree in 1988 from the University of Tennessee. A member of the National Trial Team, he received recognition as an Outstanding Clinic Student for the Spring 1988 semester.

Offered an opportunity to relocate to Atlanta, Georgia, in 1997 Mark became an in-house attorney for State Farm Mutual Automobile Insurance Company. Staying in-house, but moving to Travelers Indemnity Company in 2001 in Atlanta, Mark returned home to Knoxville in 2006 to open a new in-house counsel office for Travelers. Mark returned to private practice with Greg Coleman Law PC in 2010.

Mark's 31-year litigation career highlights includes more than 100 jury trials, more than 100 bench trials, and many appellate cases. An active musician with wide ranging interests, Mark currently acts as the legal advisor to TheMarchingRoundtable.com and The Marching Roundtable Judges Academy.

Practice Areas: Class Actions, Consumer Protection/Consumer Rights, Multi District Litigation, Business Litigation, Product Liability, ERISA, Employment Law, Motor Vehicle Accident Litigation, Wrongful Death



Rachel Soffin | Senior Attorney



Rachel Soffin is a Senior Attorney at Greg Coleman Law and focuses on consumer class action litigation. She has spent the majority of her career prosecuting class action cases, including state and federal class actions involving product manufacturers and retailers, deceptive trade practices, privacy violations, and insurance and banking disputes. Prior to joining Greg Coleman Law, Rachel worked in the area of consumer class actions in Morgan & Morgan's Tampa office. Prior to her time at Morgan & Morgan, Rachel served as in-house counsel for one of Florida's largest employee leasing companies.

Rachel obtained her undergraduate degree in Finance, with honors, from The Florida State University. While in college, she worked at the Florida Legislature, where she worked closely with government leaders. Rachel earned her law degree from Stetson University

College of Law, cum laude, where she served as a Digest Writer on the Stetson Law Review and was published multiple times in that capacity.

Rachel is admitted to practice in the state courts of Florida and Georgia, and in the United States District Court for the Middle District of Florida, the United States District Court for the Southern District of Florida, the United States District Court for the Northern District of Georgia, the United States District Court for the Northern District of Illinois, and the United States Court of Appeals for the Eleventh Judicial Circuit.

Ms. Soffin has been designated by *Super Lawyers* as a Florida Rising Star (2011-2013), and as a Florida Super Lawyer (2014-2018) in the fields of Class Actions/Mass Torts.

Practice Areas: Class Actions, Consumer Protection, Mass Torts



Arthur Stock | Senior Attorney



Arthur Stock joined Greg Coleman Law as a Senior Attorney in 2019. Previously, he had been a shareholder at Berger Montague in Philadelphia, Pennsylvania for over 20 years. Throughout his career, he has represented plaintiffs in commercial, financial, securities, and consumer class actions. He has also represented whistleblowers in *qui tam* actions in federal courts, and in administrative proceedings before the U.S. Securities and Exchange Commission, the Internal Revenue Service, and the United States Tax Court.

Mr. Stock was a principal litigator in numerous class actions, including: *Merrill Lynch Inc. Securities Litigation*, which resulted in a \$475 million settlement on behalf of investors in Merrill Lynch securities; *Lee v. Enterprise Leasing Co.*, in which class members recovered 80% of alleged damages

from allegedly illegal charges regarding Nevada airport car rentals; and *Vasco v. PHRG*, an action brought under the Telephone Consumer Protection Act, in which class members recovered \$5.2 million from a business that allegedly placed telemarketing calls to consumers without prior express consent.

Before entering private practice, Mr. Stock served as a Law Clerk to the Honorable Jackson L. Kiser, United States District Court of the Western District of Virginia.

Representative reported decisions:

Richardson v. Verde Energy USA, Inc., 354 F.Supp.3d 639 (E.D. Pa. 2018), and 2016 WL 7380708 (E.D. Pa. Dec. 19, 2016), (sustaining complaint and partially denying summary judgment in TCPA class action).

South Peninsula Hospital v. Xerox State Healthcare LLC, 223 F.Supp.3d 929 (D. Alaska 2016) (sustaining complaint in class action brought on behalf of healthcare providers in Alaska for improper delays and denials of Medicaid reimbursement caused by allegedly defective software).

Vasco v. PHRG, 2016 WL 5930876 (E.D. Pa. Oct. 12, 2016) (approving consumer class settlement).

Lee v. Enterprise Leasing Co.-West, 2015 WL 2345540 (D. Nev. May 15, 2015), and 300 F.R.D. 466 (D. Nev. 2014), and 30 F.Supp.3d 1002 (D. Nev. 2014) (granting plaintiffs' motions for summary judgment, class certification, and approval of settlement, in consumer class action alleging overcharges on airport car rentals).

In re Clarus Corp. Securities Litigation, 201 F.Supp.2d 1244 (N.D. Ga. 2002) (sustaining complaint in securities fraud class action).



Publications:

"Theory v. Practice: A Comment on Orin Kerr's 'A Theory of Law'," 16 Green Bag 2d 224 (Winter, 2013)

"Make Way for Lawsuits," 11th Annual NERA Finance, Law & Economics Securities Litigation Conference

Education:

Yale University, B.A. with distinction in economics
Two majors: economics and philosophy

Duke University School of Law, J.D. with high honors
Articles Editor, *Duke Law Journal*
Order of the Coif

Admissions:

State Courts of Pennsylvania
State Courts of North Carolina
Pennsylvania Supreme Court
United States District Court of the Eastern District of Pennsylvania
United States Court of Appeals for the Seventh Circuit
United States Court of Appeals for the Ninth Circuit
United States Tax Court

Practice Areas: Class Actions, Complex Litigation, Fair Labor Practices, Consumer Protection, Consumer Rights



Martha Geer | Senior Attorney



Martha Geer has a combination of experience that few attorneys possess and clients find invaluable. She has practiced for more than two decades as a respected litigator and appellate advocate, and served for more than 13 years as a rarely-reversed appellate judge. As a trial lawyer and board-certified appellate specialist, Judge Geer is known for obtaining cutting-edge and precedent-setting victories in both class actions and individual cases in a diverse set of practice areas, including consumer protection, securities, ERISA,

environmental, labor and employment law, antitrust and trade regulation, contingent commercial litigation, and civil rights litigation.

Judge Geer received her B.A. summa cum laude from Bryn Mawr College and her J.D. with high honors from the University of North Carolina School of Law where she was a Morehead Fellow (a merit-based full scholarship), and served as Managing Editor of the North Carolina Law Review.

After law school, Judge Geer joined Paul Weiss, one of the top law firms in the country, where she represented corporate clients in class actions, shareholder litigation, and commercial disputes. Subsequently, she was a partner with two leading North Carolina plaintiffs' firms (a founding member of the second firm), and represented plaintiffs in a wide range of complex civil litigation, including class actions and individual cases.

She was first elected to the North Carolina Court of Appeals in 2002. In 2010, because of her reputation as a fair and impartial judge, she garnered strong bipartisan support resulting in her winning re-election by a 20-point margin. During her tenure, Judge Geer heard more than 3,800 appeals, authored more than 1,350 opinions, and had her opinions reversed less than 2% of the time. She left the Court of Appeals to become a partner at Cohen Milstein Sellers & Toll LLP, a leading plaintiffs' class action firm, and founded its Raleigh office. In 2019, she joined Greg Coleman Law as a Senior Attorney.

Judge Geer is a highly sought-after teacher of continuing education programs for both judges and lawyers. As a trial and appellate lawyer, she has been regularly recognized in The Best Lawyers in America, most recently (2018, 2019, and 2020 eds.) in the areas of appellate practice and mass tort/class actions. Prior to joining the bench, she was selected by Business North Carolina as one of North Carolina's "Legal Elite."



Alex R. Straus | Senior Attorney



Alex R. Straus was born and raised in New York, NY. Alex is currently licensed to practice law in California, Massachusetts, New York, Rhode Island, and South Carolina. For more than a decade, Alex has represented consumers, labor unions, and municipalities throughout the United States in practice areas ranging from complex tort and personal injury to antitrust and securities litigation. Prior to joining Greg Coleman Law, Alex spent the majority of his legal career as a litigation attorney with Motley Rice LLC after a long career as an investigative journalist and author. In 2013, Alex authored an *amicus curiae* brief filed in the United States Supreme Court in support of a shipyard worker who died as a result of asbestos exposure.

An avid writer, Alex co-authored with legendary trial lawyer, Ron Motley, a chapter in the book *Pathology of Asbestos-Related Diseases*, which was published in 2014. Alex has also authored two books, *Medical Marvels: The 100 Most Important Medical Advances* (Prometheus Books, 2006) and *Guerrilla Golf: The Complete Guide to Playing Golf on Mountains, Pastures, City Streets and Everywhere But the Course* (Rodale Press, 2006). The author of more than 100 nationally published feature-length articles, Alex won the New York Press Association Best Sports Feature award in 1999.

As a law student at Roger Williams University School of Law, Alex was the 2009 recipient of the Kathleen Brit Memorial Prize for Alternative Dispute Resolution and served as law clerk for the New England Patriots, working with the team's General Counsel on real estate acquisitions, environmental compliance, and collective bargaining issues. Alex attended Rollins College in Winter Park, Florida and Columbia University's School of International and Public Affairs in New York, New York.

Publications:

- "Pathology of Asbestos-Related Diseases" (2013)
- "Medical Marvels: The 100 Most Important Medical Advances" (Prometheus Books, 2006)
- "Guerrilla Golf: The Complete Guide to Playing Golf on Mountains, Pastures, City Streets and Everywhere But the Course" (Rodale Press, 2006)

Education:

- Rollins College in Winter Park, Florida
- Columbia University's School of International and Public Affairs in New York, New York
- Roger Williams University School of Law



- 2009 recipient of the Kathleen Brit Memorial Prize for Alternative Dispute Resolution

Admissions:

- State Courts of California
- State Court of Massachusetts
- State Court of New York
- State Court of Rhode Island
- State Court of South Carolina

Alex serves as an Executive Board Member of the Gary Forbes Foundation, a nonprofit organization that advocates for diabetes research and education. Active in his community, he has worked with Volunteer of America's Operation Backpack, an organization that provides school supplies to more than 7,000 homeless children in New York City.



Jonathan Cohen | Senior Attorney



Jonathan Cohen is a Senior Attorney at Greg Coleman Law and focuses on consumer class action litigation. Jonathan has spent his entire legal career prosecuting class actions, including state and federal consumer class actions against banks, mortgage companies, debt collectors, retailers, and insurance companies alleging violations of the Florida Deceptive and Unfair Trade Practices Act, the Telephone Consumer Protection Act, the Fair Credit Reporting Act, and the forced placement of insurance. He has also prosecuted class actions involving data breaches, defective products, deceptive products, breaches of contract, employment discrimination, and illegal taxation.

Jonathan also served as counsel for the court-appointed receiver in the Ponzi scheme-related matter of *Wiand v. Wells Fargo Bank, et al.*, Case No. 8:12-cv-557-T-27EAJ (M.D. Fla.). Prior to joining Greg Coleman Law, Jonathan was a partner in Morgan & Morgan's Complex Litigation Group in Tampa, Florida. Prior to his time at Morgan & Morgan, Jonathan was a partner at James, Hoyer, Newcomer & Smiljanich, P.A., a firm specializing in the prosecution of nationwide consumer class actions and whistleblower (qui tam) actions.

Jonathan was born in Albany, New York and raised in Nashville, Tennessee. He attended Indiana University and graduated in 1996 with a Bachelor of Arts degree in Journalism. Following a career in marketing and advertising in Chicago, Jonathan relocated to St. Petersburg, Florida, where he attended Stetson University College of Law and earned his Juris Doctor degree in 2005. During his tenure at Stetson, Jonathan was an intern for the State Attorney's Office (Economic Crimes Unit), Thirteenth Judicial Circuit, Hillsborough County, and for the Honorable David A. Demers, Sixth Judicial Circuit of Florida.

Jonathan is admitted to practice in the state courts of Florida, and in the U.S. District Court for the Middle District of Florida, U.S. District Court for the Southern District of Florida, U.S. District Court for the Northern District of Illinois, U.S. District Court for the Western District of Wisconsin, U.S. District Court for the District of Colorado, and U.S. Courts of Appeals for the First, Fifth, and Eleventh Circuits.

Practice Areas: Class Actions, Consumer Protection, Mass Torts



Class Counsel Appointments:

Mr. Cohen has been appointed class counsel by courts in the following representative cases:

- Black-Brown v. Terminix Int'l Co. Ltd. Partnership, Case No. 16-cv-23607 (S.D. Fla.)
- Preman v. Pollo Operations, Inc., Case No. 16-cv-00443 (M.D. Fla.)
- Zyburo v. NCSPlus, Inc., Case No. 12-Cv-6677 (S.D.N.Y.)
- Swift v. Bank of America Corp., et al., No. 14-cv-01539 (M.D. Fla.)
- Ownby v. Citrus County, Florida, Case No. 2004-CA-1840 (Fla. 5th Cir., Citrus County)



Justin G. Day | Senior Associate



A native East Tennessean, Justin graduated with a bachelor's degree in honors philosophy and political science from the University of Tennessee, where he was awarded the Davis Scholarship and named the top graduate in his major. Justin then attended law school at the University of Tennessee College of Law, where he was a Green Scholar, president of the Christian Legal Society, and one of the first-ever recipients of the Jerry P. Black Jr. Student Clinic Attorney Award.

Before joining Greg Coleman Law, Justin practiced family law, juvenile law, and criminal law in Morristown, Tennessee.

Since joining the firm, Justin has been actively involved in a number of the firm's practice areas, including the firm's personal injury, consumer protection, and mass tort areas.

Active in his local community, Justin is a member of Fellowship Church of Knoxville and volunteers in its children's ministry. In his spare time, Justin can usually be found exercising, reading at a local coffee shop, or playing golf.



William A. Ladnier | Associate



Will Ladnier grew up in Nashville, Tennessee. A lifelong Vols fan, he then moved to Knoxville to attend the University of Tennessee, where he graduated *summa cum laude* with degrees in Classics, History, and Political Science.

After obtaining his undergraduate degree, Will attended William and Mary Law School in Williamsburg, Virginia. While there, he was heavily involved as a competing member of the National Trial Team and as Articles Editor for the *William & Mary Law Review*. Before graduating *cum laude*, he also worked with a number of judges in Virginia, including Justice LeRoy F. Millette on the Supreme Court of Virginia.

Following law school, Will returned to Knoxville and clerked with Chief Justice Sharon G. Lee on the Tennessee Supreme Court. He then accepted a position with Arnett, Draper & Hagood, focusing on insurance defense and medical malpractice and healthcare liability defense, representing the largest hospital association in the region.

Will joined Greg Coleman Law in 2018, shifting his practice to representing plaintiffs. He primarily practices in the areas of complex litigation and class action cases. Will is admitted to practice in Tennessee in both state and federal court in the Eastern District, and he is also a member of the Knoxville and Tennessee Bar Associations.

When not working, Will enjoys spending time with his wife, son, and dog, and if it's a weekend, you'll find him watching Vols and Titans football.

Practice Areas: Class Actions, Complex Litigation, Fair Labor Practices, Consumer Protection, Consumer Rights, Multi District Litigation, Product Liability



Ryan P. McMillan | Associate



Ryan is a native of East Tennessee and grew up in Oak Ridge. There he was active in the Boy Scouts and competitive rowing. He attended the University of Mary Washington in Fredericksburg, Virginia, where he received his Bachelor's Degree, cum laude, in History.

Ryan returned to Tennessee in 2006 and later went to law school at the University of Tennessee, where he focused primarily on employment law. While in law school he clerked for the United States Department of Energy and London and Amburn, P.C. He also was a staff editor for the Tennessee Journal of Law and Policy and received the Patrick L. Hardin Award for Excellence in Employment and Labor Law.

After law school, Ryan worked at Dale Buchanan and Associates for many years where he represented thousands of disabled clients.

In 2019, Ryan joined Greg Coleman Law to continue his work in representing plaintiffs, primarily in class action and complex litigation matters.

Ryan lives in Alcoa with his wife and son. In his free time, Ryan enjoys hiking in the Smokies, spending time with his family, and traveling.

Practice Areas: Class Actions, Complex Litigation, ERISA, Disability Law



Louis W. Ringger, III (Billy) | Associate



Billy Ringger joined Greg Coleman Law in 2019, bringing extensive experience in the areas of complex civil litigation and appellate practice. Before joining the firm, Mr. Ringger practiced with the Knoxville law firm, Butler, Vines & Babb, PLLC, where he built a strong reputation as a successful litigator and a skilled advocate. Mr. Ringger now represents plaintiffs in a wide range of complex civil matters, including medical malpractice, toxic exposure, environmental damage litigation, civil rights actions, and whistleblower suits.

The son of a lawyer, Mr. Ringger is originally from Parsons, Tennessee, a small West Tennessee town near the Tennessee River. He moved to Knoxville in 2002 to attend the University of Tennessee as an undergraduate and quickly fell in love with the area. He later attended UT law school, where he was recognized for his skills in advocacy, receiving the Ogden and Sullivan Moot Court Brief Writing Award and the Susan B. Devitt National Moot Court Award for Written and Oral Advocacy.

After law school, Mr. Ringger served as judicial law clerk to then Chief Justice Sharon Lee of the Tennessee Supreme Court. He remained in this role for nearly two-and-a-half years, serving as Chief of Staff to the Chief Justice for much of that time. Through this experience, Mr. Ringger gained extensive knowledge of current and emerging Tennessee law and unique insight into the Tennessee judicial process.

Mr. Ringger is licensed to practice law in all state and federal courts in Tennessee and the United States Court of Appeals for the Sixth Circuit. He is a member of the Knoxville and Tennessee Bar Associations, and the Tennessee Trial Lawyers Association. He currently serves on the executive committee of the TBA Tort and Insurance Law section, and as Secretary of the KBA Professionalism Committee. Outside of his practice, Mr. Ringger enjoys spending time with his family and hiking in the East Tennessee mountains.

Practice Areas: General Civil Litigation, Personal Injury, Medical Malpractice, Toxic Torts, Civil Rights, Whistleblower Actions



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