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TARRANT COUNTY
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THOMAS A. WILDER
DISTRICT CLERK

CAUSE NO. 067-348166-23

JEREMY P. BACA, DYLAN LAMOREAUX, PETER SALINAS, and **CURTIS LANE**, individually and on behalf of all others similarly situated,	§	**IN THE DISTRICT COURT**
Plaintiffs,	§	**TARRANT COUNTY, TEXAS**
v.	§	
BEN E. KEITH COMPANY,	§	
Defendant.	§	**67TH JUDICIAL DISTRICT COURT**

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES, AND SERVICE AWARDS AND MEMORANDUM IN SUPPORT

Plaintiffs Jeremy P. Baca, Dylan Lamoreaux, Peter Salinas, and Curtis Lane, through their attorneys, individually and on behalf of all others, hereby move this Court, pursuant to Tex. R. Civ. P. 42(h) and Tex. R. Civ. P. 42(i) to:

1. Approve Attorneys' Fees, Costs, and Expenses to Class Counsel in the amount of $270,000.00, as provided for in the Settlement Agreement;

2. Approve Service Awards of $2,000.00 to Plaintiffs Baca, Lamoreux, Salinas, and Lane for their service as the Class Representatives; and

3. Grant such other and further relief as the Court deems just and proper.

This Motion is based upon: (1) this Motion; (2) the following Memorandum of Law in support; (3) Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Memorandum of Support; (4) the Declaration in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement; (5) the Settlement Agreement; (6) the Declaration of Settlement Class Counsel in Support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards ("Fee Decl.") (attached hereto as **Exhibit 1**); (7) the records, pleadings, and papers

filed in this Action; and (8) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

I. INTRODUCTION

On July 29, 2026, the Court preliminarily approved a proposed class action Settlement Agreement (the "Settlement" or "SA")[1] between Defendant and Plaintiffs, on behalf of themselves, and on behalf of the Settlement Class. Pursuant to the terms of the Settlement Agreement, Class Counsel now respectfully seek an award of reasonable attorneys' fees, costs, and expenses in the combined amount of $270,000.00, and Service Awards for Plaintiffs. For the reasons set forth below, these requests are reasonable, appropriate, and mirror approved requests in similar data privacy cases. Therefore, Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards (the "Motion") should be GRANTED.

II. FACTUAL AND PROCEDURAL BACKGROUND

To promote judicial efficiency and avoid unnecessary repetition, Plaintiffs respectfully refer the Court to, and hereby incorporate by reference, Plaintiffs' Motion for Preliminary Approval, and the accompanying exhibits, for the detailed factual and procedural background underpinning this case.

III. SUMMARY OF THE SETTLEMENT TERMS

The Settlement represents an outstanding result for the Settlement Class and provides a comprehensive benefits package for all Settlement Class Members who choose to submit a claim.

Cash Payment A – Extraordinary Losses. All Settlement Class Members are eligible to

[1] Unless otherwise noted herein, all capitalized terms shall have the meaning ascribed to them in the Settlement Agreement ("SA"), which was attached as Exhibit 1 to Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Memorandum in Support ("Motion for Preliminary Approval"), filed July 28, 2026.

submit a claim for up to $5,000.00 per Settlement Class Member upon presentment of reasonable documentation of losses related to fraud and/or identity theft as a result of the Data Security Incident. Extraordinary Losses include, by way of example, unreimbursed losses relating to fraud or identity theft if: (i) the loss is an actual, documented, and unreimbursed monetary loss; (ii) the loss was more likely than not caused by the Data Security Incident; and (iii) the loss was incurred in or around March 2023, and the date of the Claim Deadline. (*See* SA, ¶ 68(a)).

Cash Payment B – Ordinary Losses. Settlement Class Members may also submit a Claim for Cash Payment B, up to $400.00 for unreimbursed out-of-pocket expenses incurred as a result of the Data Security Incident, including, without limitation: (i) bank fees; (ii) long distance phone charges; (iii) cell phone charges (only if charged by the minute); (iv) data charges (only if charged based on the amount of data used); (v) postage; (vi) gasoline for local travel; and (vii) reimbursement for credit reports, credit monitoring, or other identity theft insurance products purchased by a Settlement Class Member between March 2023, and the date of the Claim Deadline. (*Id*. ¶ 68(b)).

Cash Payment C – Lost Time. Settlement Class Members may also submit a Claim for Cash Payment C, reimbursement for time spent remedying issues related to the Data Security Incident or researching the Data Security Incident at a rate of $30.00 per hour, for up to three (3) hours (a maximum of $90.00), which will require the Settlement Class Member to attest (by signature or checkmark) the validity of the Class Member's Lost Time Claim and to briefly describe the time spent. (*Id*. ¶ 68(c)).

Cash Payment D - Alternative Cash Payment. As an alternative to Cash Payment A, Cash Payment B, and Cash Payment C, Settlement Class Members may elect to receive Cash Payment D, which is a flat cash payment in the amount of $35.00. (*Id*. ¶ 68(d)). No documentation is

required to claim this benefit other than submission of a Valid Claim. (*Id.*).

***Credit Monitoring*.** In addition to the Cash Payments described above, all Settlement Class Members may submit a claim for three (3) years of one-bureau credit monitoring. (*Id.* ¶ 69).

Remedial Measures. Prior to Final Approval, Defendant will provide Class Counsel with a written and signed confidential declaration regarding the data security measures, including the costs associated therewith, it implemented following the Data Security Incident to better protect the Settlement Class's Private Information. (*Id.* ¶ 71). The costs of any such security measures on the part of Defendant were paid or will be paid separately by or on behalf of Defendant. (*Id.*).

Claims for Cash Payments A, B, C, and D are subject to a generous Aggregate Cap of $900,000.00. (*Id*. ¶ 67). Defendant will also pay the cost to administer the Settlement, including the Settlement Administrator's costs to notify the Settlement Class and process claims, as well as the class counsel's attorney fees and costs, and Plaintiffs' Service Awards ***in addition*** to the cap on payment for cash payments. (*Id.* ¶ 70). In other words, any award of attorneys' fees will not reduce the benefits made available to the Settlement Class. (*Id.* ¶ 67).

IV. ARGUMENT

A. Plaintiffs' Service Award Payments are Justified.

Courts "typically award and justify incentive compensation when the named plaintiffs expend time and effort beyond that of the other class members in assisting class counsel with litigation by actively reviewing the case and advising counsel in prosecuting the case, or when the named plaintiffs faced the risk of retaliation or threats as a result of their participation as class representatives." *Morris v. Thibodeau*, No. 05-00-01350- CV, 2001 Tex. App. LEXIS 7585, at *15 (Tex. App.—Dallas 2001) (approving incentive awards in varying amounts between $6,000 and $10,000); *Lee v. Metrocare Servs*., Civil Action No. 3:13- cv-2349-O, 2015 U.S. Dist. LEXIS

194001, at *9 (N.D. Tex. July 1, 2015). Courts use differing factors when approving service awards, but they all consider the "risk" accepted by the representative, whether they protected the class, how they benefited from the settlement, and their effort. *Lee*, 2015 U.S. Dist. LEXIS 194001, at *9 (explaining five- and three-factor tests).

Awarding a service award to a class representative encourages participation in class actions despite the time, effort, and risks involved. Plaintiffs actively assisted Class Counsel throughout the litigation on behalf of the Settlement Class. (Fee Decl., ¶ 14). The Class Representatives devoted substantial effort on behalf of the Settlement Class, including: (i) completing detailed questionnaires; (ii) providing counsel with critical information to support their claims; (iii) gathering documents and other evidence relevant to the litigation; (iv) agreeing to participate in potentially invasive and time-consuming discovery, including depositions, if required; (v) reviewing pleadings and coordinating with counsel on case strategy and status; (vi) conferring with counsel regarding settlement negotiations; and (vii) carefully considering and approving the Settlement terms on behalf of the Class. (*Id*.). Their dedication to the interests of the Class and their commitment to securing meaningful relief warrant recognition through the requested Service Awards, which are routinely approved in data breach litigation of this nature. *See, e.g., Burge, et al. v. Mason Construction LLC*, No. 24-DC-CV-2053 (Dist. Ct. of Jefferson Cty. Tex. June 9, 2026) (awarding service awards of $2,500 in connection with a similar data breach class action settlement); *Flores, et al. v. South Texas Oncology and Hematology, PLLC*, No. 2024CI13299 (Dist. Ct. of Bexar Cty. Texas July 21, 2026) (approving service awards of $2,500.00 in a data breach class action settlement).

B. The Attorneys' Fees, Costs, and Expenses Sought by Settlement Class Counsel are Reasonable and Should be Approved.

1. Legal Standard.

According to Texas Rule of Civil Procedure 42(i), "[i]n awarding attorney fees, the court must first determine a lodestar figure by multiplying the number of hours reasonably worked times a reasonable hourly rate." "The attorney fees award must be in the range of 25% to 400% of the lodestar figure." Tex. R. Civ. P. 42(i). "In making these determinations, the court must consider the factors specified in Rule 1.04(b), Tex. Disciplinary R. Prof. Conduct." *Id.* These factors include:

> (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly;
> (2) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
> (3) the fee customarily charged in the locality for similar legal services;
> (4) the amount involved and the results obtained;
> (5) the time limitations imposed by the client or by the circumstances;
> (6) the nature and length of the professional relationship with the client;
> (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and
> (8) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.

TDRPC § 1.04(b).

2. The Requested Fee Award is Within the Range Allowed by Tex. R. Civ. P. 41(i).

As explained above, Texas Rule of Civil Procedure 42(i) requires an attorneys' fee award to fall between 25% and 400% of the lodestar figure. To date, Class Counsel have devoted substantial time and resources to this action, resulting in a lodestar of $193,140. (Fee Decl., ¶ 10). The requested fee award currently represents a lodestar multiplier of 1.4. That multiplier is reasonable in light of Class Counsel's substantial efforts, the meaningful relief secured for the Settlement Class, and the significant risks inherent in the litigation. (*Id*., ¶ 11). Moreover, the multiplier will continue to decrease as Class Counsel prepare the motion for final approval, prepare

for and attend the final approval hearing, and oversee the remaining notice and claims administration work. Accordingly, the requested fee award falls comfortably within the range permitted by Texas Rule of Civil Procedure 42(i). *See, e.g.*, *Kelley Banner, et al., v. American National Bank & Trust*, No. DC30-CV-2025-1068 (Dist. Ct. of Wichita Cty. Tex., Apr. 29, 2026) (approving $500,000.00 fee request (a 2.02 lodestar multiplier) in a data breach class action); *John Glover v. Nova Recovery LLC d/b/a Nova Recovery Center*, No. 25-2312- DCE (Dist. Ct. of Hays Cty., Tex., Apr. 22, 2026) (approving $200,000.00 fee request with a lodestar multiplier of 2.85 in data breach class action); *see also Jeffrey Pan v. Atlas Real Est. Grp. LLC*, No. 23-cv-00910, 2025 U.S. Dist. LEXIS 43019, at *21 (D. Colo. Mar. 10, 2025) (granting class counsel's motion for attorney's fees in data breach matter, holding "A multiplier of 2.19, which will only decrease as counsel spends additional time on this lawsuit, easily fits within this range of reasonableness."); *Everetts v. Pers. Touch Holding Corp.*, No. 21-cv-2061, 2025 U.S. Dist. LEXIS 59005, at *17 (E.D.N.Y. Mar. 28, 2025) (granting class counsel's motion for attorney's fees, holding "a multiplier of 2.39, resulting in a fee of $297,038.56, is presumptively reasonable for counsel's efforts in this case").

3. The Factors Set Forth in Rule 1.04(b) of the Texas Disciplinary Rules of Professional Conduct Support the Requested Fee.

a. Factors 1, 2, 7, and 8: the Time and Labor Required, the Novelty and Difficulty of the Questions Involved, and the Skill Requisite to Perform the Legal Service Properly; the Preclusion of Other Employment; the Experience, Reputation, and Ability of the Lawyer or Lawyers Performing the Services; and Whether the Fee is Fixed or Contingent on Results Obtained or Uncertainty of Collection Before the Legal Services Have Been Rendered.

This action called for considerable skill and experience, requiring investigation and mastery of complex factual circumstances, the ability to develop creative legal theories, and the

skill to respond to a host of legal defenses. (Fee Decl., ¶ 2). Data breach litigation is a highly technical, complex, and cutting-edge area of the law that presents numerous developing issues, evolving precedents, and unpredictable outcomes. *See, e.g.*, *Fox v. Iowa Health Sys.*, No. 3:18-cv-00327-JDP, 2021 U.S. Dist. LEXIS 40640, at *13 (W.D. Wis. Mar. 4, 2021) ("Data breach litigation is evolving; there is no guarantee of the ultimate result.") (citation omitted); *In re Sonic Corp. Customer Data Sec. Breach Litig*., No. 1:17-md-2807, 2019 U.S. Dist. LEXIS 135573, at *14 (N.D. Ohio Aug. 12, 2019) ("Data breach litigation is complex and risky. This unsettled area of law often presents novel questions for courts. And of course, juries are always unpredictable."); *Fulton-Green v. Accolade, Inc.*, 2019 U.S. Dist. LEXIS 164375, at *21 (E.D. Pa. Sep. 23, 2019) (noting data breaches are a "risky field of litigation" because they "are uncertain and class certification is rare"). Despite these risks, however, Class Counsel undertook this litigation on an entirely contingency fee basis with no promise of any reward. (Fee Decl., ¶ 3).

Class Counsel assumed a substantial risk of nonpayment or under compensation in prosecuting this action. (*Id.*). Class Counsel undertook this case with the understanding that compensation would be contingent upon achieving a recovery for Plaintiffs and obtaining Court approval of the requested fees. (*Id*.). Like most class actions, this litigation required a significant investment of time and resources, which necessarily diverted counsel from other fee-generating matters involving less risk and complexity. (*Id*. ¶ 4). Accordingly, neither compensation for counsel's time nor reimbursement of litigation expenses was guaranteed. (*Id*.).

The risk of non-payment is especially prevalent in data breach cases, which have experienced varying levels of success. Many data breach cases are dismissed in their entirety at the motion to dismiss stage, providing no relief for the class and no compensation for counsel. Indeed, in 2025 alone, several data breach class actions were dismissed in their entirety at the

pleading stage.[2]

This action involved substantial risk, and Plaintiffs faced formidable hurdles if the litigation were to proceed. (Fee Decl., ¶ 6). Most notably, Plaintiffs faced the significant risk of not surviving summary judgment or securing class certification—both of which have been historically difficult to achieve in data breach cases. *See, e.g.*, *Smith v. Apria Healthcare LLC*, No. 1:23-cv-01003-JPH-KMB, 2025 U.S. Dist. LEXIS 225320, at *19 (S.D. Ind. Nov. 17, 2025) (noting courts have not settled on whether plaintiffs can certify classes or survive summary judgment in data breach cases); *In re Hannaford Bros. Co. Customer Data Sec. Breach Litig*., 293 F.R.D. 21 (D. Me. 2013) (denying class certification in data breach class action); *Gaston v. Fabfitfun, Inc.*, No. 2:20-cv-09534-RGK-E, 2021 U.S. Dist. LEXIS 250695, at *6 (C.D. Cal. Dec. 9, 2021) ("Historically, data breach cases have experienced minimal success in moving for class certification.") (citation omitted); *In re Blackbaud, Inc., Customer Data Breach Litig.*, No. 3:20-mn-02972-JFA, 2024 U.S. Dist. LEXIS 86740 (D.S.C. May 14, 2024) (denying motion for class certification in data breach case); *see also In re Blackbaud, Inc., Customer Data Breach Litig.*, No. 3:20-mn-02972-JFA, 2024 U.S. Dist. LEXIS 234064 (D.S.C. Dec. 30, 2024*)* (denying motion for leave to file a renewed class certification motion).

While Plaintiffs firmly believe in the merit of their claims, Plaintiffs and their counsel recognize that establishing causation and damages in the evolving field of data breach litigation is challenging and far from certain. *See, e.g.*, *Hashemi v. Bosley, Inc.*, No. CV 21-946 PSG (RAOx),

[2] *See, e.g.*, *Feathers v. On Q Financial LLC*, 2025 U.S. Dist. LEXIS 121338 (D. Ariz. June 26, 2025); *Harvey v. National Amusements, Inc.*, 2025 U.S. Dist. LEXIS 57256 (D. Mass. Mar. 27, 2025); *Hemphill v. Horne, LLP*, 2025 U.S. Dist. LEXIS 51404 (S.D. Miss. Sept. 10, 2025); *In Re U.S. Vision Data Breach Litig.*, 2025 U.S. Dist. LEXIS 34345 (D.N.J. Feb. 26, 2025); *Dougherty v. Bojangles' Restaurants, Inc.*, 2025 U.S. Dist. LEXIS 194879 (W.D.N.C. Sept. 30, 2025); *Perlaki v. J.B. Poindexter & Co., Inc.*, 2025 U.S. Dist. LEXIS 42397 (S.D. Tex. Mar. 10, 2025); *Stern v. Academy Mortgage Corp.*, 2025 U.S. Dist. LEXIS 9568 (D. Utah Jan. 17, 2025).

2022 U.S. Dist. LEXIS 210946, at *9 (C.D. Cal. Nov. 21, 2022) (explaining that data breach class actions are a relatively new type of litigation and that damages methodologies in data breach cases are largely untested and have yet to be presented to a jury). Continued litigation would entail formal discovery, depositions, expert reports, maintaining class certification through trial, summary judgment, and potential appeals—both interlocutory and post-judgment—each requiring additional rounds of briefing and carrying the risk of no recovery. (Fee Decl., ¶ 7). In contrast, the Settlement ensures meaningful relief for the Settlement Class, which prolonged litigation could not guarantee. (*Id*.); *In re HealthEC LLC Data Breach Litig.*, No. 2:24-cv-26 (SDA), 2025 U.S. Dist. LEXIS 107723, at *26–27 (D.N.J. June 6, 2025) ("[M]any courts have already recognized, data breach litigation is long, complicated and expensive. This settlement, relatively early in the litigation, avoids delay, risk and expense, and affords class members real relief.").

This exceptional Settlement was only obtained through the experience and skill of Class Counsel. (Fee Decl., ¶ 8). Class Counsel are highly experienced in this area of practice and have a well-respected reputation in the data privacy litigation sector. (*Id*.). Class Counsel worked hard and at great risk on behalf of the Settlement Class to obtain information from Defendant regarding the Data Breach and utilized their experience and knowledge gained from other data breach class actions to negotiate a favorable Settlement. (*Id*.). In sum, the Settlement directly addresses the harms and consequences suffered by Settlement Class Members as a result of the Data Breach and provides substantial compensation to restore them. (*Id*. ¶ 9). The complexity of the litigation and the exceptional quality of Class Counsel's work strongly support the requested fee.

b. Factor 3: The Fee Customarily Charged in the Locality for Similar Legal Services.

The fees requested by Class Counsel here are inherently reasonable when compared to fee awards in similar cases and in comparison with rates charged for similar legal services. In the Fifth

Circuit, courts "encourage counsel" to "arrive at a settlement as to attorney's fees." *Johnson v. Ga. Highway Express, Inc*., 488 F.2d 714, 720 (5th Cir. 1974). "An agreed upon award of attorneys' fees and expenses is proper in a class action settlement, so long as the amount of the fee is reasonable under the circumstances… In fact, courts have encouraged litigants to resolve fee issues by agreement, if possible." *DeHoyos v. Allstate Corp*., 240 F.R.D. 269, 322 (W.D. Tex. 2007) (citing Fed. R. Civ. P. 23(h) and collecting cases). "Accordingly, courts are authorized to award attorney fees and expenses where all parties have agreed to the amount, subject to court approval." *Id*.

Courts also recognize that data breach settlements are "difficult" to value given the benefits they provide, such as improved data security and credit monitoring. *Bowdle v. King's Seafood Co*., No. SACV 21-01784-CJC (JDEx), 2022 U.S. Dist. LEXIS 240383, at *19 (C.D. Cal. Oct. 19, 2022). For this reason, "the main inquiry is whether the end result is reasonable." *Gaston v. Fabfitfun, Inc*., No. 2:20-cv-09534-RGK-E, 2021 U.S. Dist. LEXIS 250695, at *5 (C.D. Cal. Dec. 9, 2021). Here, the result and the requested fee are not only reasonable but are in line with other similar data breach settlements approved in Texas and throughout the country. *See, e.g.*, *Kelley Banner, et al. v. American National Bank & Trust*, No. DC30-CV-2025-1068 (Dist. Ct. of Wichita Cty. Tex., Apr. 29, 2026) (approving $500,000 fee request in data breach class action); *John Glover v. Nova Recovery LLC d/b/a Nova Recovery Center*, No. 25-2312- DCE (Dist. Ct. of Hays Cty., Tex., Apr. 22, 2026) (approving $200,000 fee request in data breach class action); *see also Warner et al v. Trinity Petroleum, et al*., No. 1:25-cv-00748, ECF No. 67 (D. Colo.) (approving attorneys' fees of $350,000.00 in connection with a similar data breach settlement); *Klepper, et al. v. MedQ, Inc.*, No. CJ-2025-6048 (Dist. Ct. of Okla. Cty. Okla. Dec. 12, 2025) (awarding attorneys' fees of $350,000.00 in similar data breach case).

Moreover, the rates used by Settlement Class Counsel in their fee calculations are consistent with those charged for similar legal services. Settlement Class Counsel's rates have been approved in connections with data breach settlements across the nations. (Fee Decl., ¶ 12).

c. Factor 4: the Amount Involved and the Results Obtained.

As discussed in Section III, *supra*, Class Counsel secured significant relief for the Settlement Class. In calculating the total value of a Settlement, courts recognize the value of the benefits provided as a whole, even if a portion may revert back to the defendant. *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980). And even if class members do not claim the entirety of the amount available to them, their "right to share the harvest of the lawsuit upon proof of their identity, whether or not they exercise it, is a benefit in the fund created by the efforts of the class representatives and their counsel[.]" *Id*. at 480.

The Settlement's benefits ensure that Settlement Class Members receive relief from any harm they have already suffered as a result of the Data Incident, such as the actual misuse of their Private Information and compensation for time they spent dealing with any misuse. The timeliness of these reimbursements is a boon to the Class; the longer they go without reimbursement, the greater the value of their damages. As such, the benefits provided by Settlement Class Counsel are significant, and this weighs in favor of granting the requested fee.

d. Factors 5 and 6: the Time Limitation Imposed by the Client or by the Circumstances and the Nature; and the Length of the Professional Relationship with the Client.

Plaintiffs alleged that due to the Data Security Incident, they were at a certainly impending risk of identity theft and fraud. Time was of the essence when securing relief and benefits for the Settlement Class. Settlement Class Counsel's efficient work will allow Settlement Class Members to expeditiously take advantage of reimbursements and credit monitoring that otherwise may not

be available to Settlement Class Members until years after the litigation is resolved (assuming the litigation is successful). These benefits will greatly help mitigate future harms.

Additionally, Class Counsel have been in communication with their clients since before this action was commenced and remain in contact with them regarding details of this Settlement and its progression. (Fee Decl., ¶ 11). Plaintiffs have been actively involved in this litigation and have approved of and support the Settlement. (*Id.*). Accordingly, this factor weighs in favor of the agreed upon fee.

C. Class Counsel's Litigation Costs and Expenses Warrant Approval.

Throughout the litigation, Class Counsel prosecuted this matter on a wholly contingent basis, assuming all risk of non-payment while advancing necessary litigation expenses totaling $2,944.56. (Fee Decl., ¶ 13). These expenditures, which included research fees, filing fees, and service costs, were reasonable, necessary, and consistent with prevailing market rates. (*Id*.) Accordingly, Class Counsel's request for reimbursement of their costs and expenses (which are part of the $270,000.00 combined award sought) should be approved. *See, e.g.*, *Northrup v. Southwestern Bell Telephone Co.*, 72 S.W. 3d 16, 21 (Tex. App.—Corpus Christi 2002) (upholding trial court's award of $21,000,000 in combined fees and expenses); *Hall v. Pedernales Elec. Co-op., Inc.*, 278 S.W.3d 536 (Tex. App.—Austin 2009) (affirming trial court's approval of settlement and award of attorneys' fees and costs). Because the costs in this case were minimal, necessary for furtherance of the litigation, and inclusive in the attorneys' fee amount sought, they should be approved.

V. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court approve Class Counsel's combined attorneys' fees, costs, and expenses in the amount of $270,000.00 and award

Plaintiffs Service Awards.

Dated: October 13, 2026

Respectfully submitted,

/s/ Joe Kendall

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record on October 13, 2026 via e-file Texas, in accordance with the Texas Rules of Civil Procedure.

/s/ *Joe Kendall*
Joe Kendall

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Filing Description: Plaintiffs' Motion for Attorneys' Fees, Costs, Expenses, and Service Awards and Memorandum in Support
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Exhibit 1

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BEN. E KEITH COMPANY,	§	
Defendant.	§	**67TH JUDICIAL DISTRICT COURT**

JOINT DECLARATION OF CLASS COUNSEL IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES, AND SERVICE AWARDS

We, Tyler J. Bean of Siri & Glimstad LLP, John Nelson of Milberg, PLLC, Kevin Laukaitis of Laukaitis Law LLC, and Philip J. Krzeski of Chestnut Cambronne PA (collectively, "Class Counsel"), jointly state as follows:

1. As Class Counsel, we have been involved in all aspects of this litigation from the initial investigation to the present. We have personal knowledge of the facts stated in this Declaration except those stated on information and belief and, as to those, we believe them to be true. If called upon, we could and would competently testify to the matters as stated

2. In prosecuting this matter, Class Counsel worked to efficiently and effectively litigate on behalf of the Class and achieve the excellent result that was obtained here. This action called for considerable skill and experience, requiring investigation and mastery of complex factual circumstances, the ability to develop creative legal theories, and the skill to respond to a host of legal defenses.

3. Despite these risks, Class Counsel undertook this litigation on an entirely contingency fee basis with no promise of any reward. Class Counsel assumed a substantial risk of nonpayment or under-compensation in prosecuting this action and Class Counsel undertook this case with the understanding that compensation would be contingent upon achieving a recovery for Plaintiffs and obtaining Court approval of the requested fees.

4. Like most class actions, this litigation required a significant investment of time and resources, which necessarily diverted counsel from other fee-generating matters involving less risk and complexity. Accordingly, neither compensation for counsel's time nor reimbursement of litigation expenses was guaranteed.

5. The risk of non-payment is especially prevalent in data breach cases, which have experienced varying levels of success. Many data breach cases are dismissed in their entirety at the motion to dismiss stage, providing no relief for the class and no compensation for counsel.

6. This action involved substantial risk, and Plaintiffs faced formidable hurdles if the litigation were to proceed. Most notably, Plaintiffs faced the significant risk of not surviving summary judgment or securing class certification—both of which have been historically difficult to achieve in data breach cases.

7. While Plaintiffs firmly believe in the merit of their claims, Plaintiffs and their counsel recognize that establishing causation and damages in the evolving field of data breach litigation is challenging and far from certain. Continued litigation would entail formal discovery, depositions, expert reports, maintaining class certification through trial, summary judgment, and potential appeals—both interlocutory and post-judgment—each requiring additional rounds of briefing and carrying the risk of no recovery. In contrast, the Settlement ensures meaningful relief for the Settlement Class, which prolonged litigation could not guarantee.

8. This exceptional Settlement was only obtained through the experience and skill of Class Counsel. They are highly experienced in this area of practice and have a well-respected reputation in the data privacy litigation sector. (*See* **Exhibits A–D** (Firm Resumes of Siri Glimstad, LLP, Milberg PLLC, Laukaitis Law, LLC, and Chestnut Cambronne PA). Class Counsel worked hard and at great risk on behalf of the Settlement Class to obtain information from Defendant regarding the Data Breach and utilized their experience and knowledge gained from other data breach class actions to negotiate a favorable Settlement.

9. The Settlement directly addresses the harms and consequences suffered by Settlement Class Members as a result of the Data Breach and provides substantial compensation to restore them. The complexity of the litigation and the exceptional quality of Class Counsel's work strongly support the requested fee.

10. Class Counsel has incurred a total lodestar of $193,140.00 based on the collective work of five firms principally involved in this class action, which represents a lodestar multiplier of 1.4.

11. That multiplier is reasonable in light of Class Counsel's substantial efforts, the meaningful relief secured for the Settlement Class, and the significant risks inherent in the litigation. Moreover, the multiplier will continue to decrease as Class Counsel prepare the motion for final approval, prepare for and attend the final approval hearing, and oversee the remaining notice and claims administration work. Additionally, Class Counsel have been in communication with their clients since before this action was commenced and remain in contact with them regarding details of this Settlement and its progression. Plaintiffs have been actively involved in this litigation and have approved of and support the Settlement.

12. The rates used by Settlement Class Counsel in their fee calculations are consistent with those charged for similar legal services. Settlement Class Counsel's rates have been approved in connections with data breach settlements across the nation.

13. Class Counsel prosecuted this matter on a wholly contingent basis, assuming all risk of non-payment while advancing necessary litigation expenses. Class Counsel have incurred costs of $2,944.56. These expenditures, which included research fees, filing fees, and service costs, were reasonable, necessary, and consistent with prevailing market rates

14. Plaintiffs Jeremy P. Baca, Dylan Lamoreaux, Peter Salinas, and Curtis Lane also request $2,000.00 service awards for their efforts in prosecuting this class action on behalf of the Settlement Class. Awarding a service award to a class representative encourages participation in class actions despite the time, effort, and risks involved. Plaintiffs actively assisted Class Counsel throughout the litigation on behalf of the Settlement Class. The Class Representatives devoted substantial effort on behalf of the Settlement Class, including: (i) completing detailed questionnaires; (ii) providing counsel with critical information to support their claims; (iii) gathering documents and other evidence relevant to the litigation; (iv) agreeing to participate in potentially invasive and time-consuming discovery, including depositions, if required; (v) reviewing pleadings and coordinating with counsel on case strategy and status; (vi) conferring with counsel regarding settlement negotiations; and (vii) carefully considering and approving the Settlement terms on behalf of the Class. Their dedication to the interests of the Class and their commitment to securing meaningful relief warrant recognition through the requested Service Awards, which are routinely approved in data breach litigation of this nature.

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

Dated: October 13, 2026

Respectfully submitted,

/s/Tyler J. Bean
Tyler J. Bean
SIRI GLIMSTAD LLP

/s/ John Nelson
John Nelson
MILBERG PLLC

/s/Phil Krzeski
Philip J. Krzeski
CHESTNUT CAMBRONNE PA

/s/ Kevin Laukaitis
Kevin Laukaitis
LAUKAITIS LAW LLC

Exhibit A

Siri | Glimstad

FIRM RESUME

Class Action Practice Group

With attorneys across the country, Siri & Glimstad LLP represents clients from coast to coast in class actions and mass torts in state and federal courts. Utilizing decades of experience at major global law firms, we tackle each dispute with a sophisticated, strategic approach, and we fight hard for every one of our clients.

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Aventura, FL 33180

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Attorney Profiles

Aaron Siri

Managing Partner



Aaron Siri is the Managing Partner of Siri & Glimstad LLP and has extensive experience in a wide range of complex civil litigation matters, with a focus on civil rights, class actions, and commercial litigation.

Mr. Siri has successfully litigated numerous civil rights cases, prosecuted class actions against large corporations resulting in payments to hundreds of thousands of Americans, and has acted as counsel to clients in multiple commercial disputes exceeding one billion dollars, including regarding Oracle Team's challenge for the America's Cup and the collapse of the World Trade Center.

Prior to founding Siri & Glimstad, Mr. Siri was a litigation attorney at Latham & Watkins for over five years. Before Latham, Mr. Siri clerked for the Chief Justice of the Supreme Court of Israel from 2004-2005 where he advised the Chief Justice of relevant American, English (including Commonwealth Countries), and International Law precedents for cases of first impression.

Mr. Siri has also been involved in various pro-bono matters, including representation of asylum applicants, housing discrimination victims, and non-profit organizations in tenant-landlord disputes, as well as being chosen as a Frank C. Newman delegate to present a paper he authored before the United Nations Human Rights Sub-Commission.

Mr. Siri earned his law degree at the University of California, Berkeley School of Law where he received four Prosser Prizes and ten High Honors. He was also the Editor-in-Chief and founder of the Berkeley Business Law Journal, which he developed into a nationally recognized publication, and was ranked as the leading commercial law journal in the country.

Prior to law school, Mr. Siri was an auditor at Arthur Andersen LLP, where he examined internal controls and audited corporate documents for private and public micro-cap technology companies. Mr. Siri is a Certified Public Accountant and an attorney admitted in federal and state courts across the country.

Mr. Siri is regularly interviewed on national television for his expertise regarding certain legal issues. He has also been published in the Washington Post, Stat News, and Bloomberg.

Mason A. Barney

Senior Partner



Mason A. Barney is an experienced trial attorney who for nineteen years has represented both individuals and corporations in complex litigations. Mr. Barney received his J.D., *summa cum laude* from Brooklyn Law School, in 2005, where he graduated second in his class of nearly 500 students, and received numerous academic honors, in addition to being an editor on the Brooklyn Law Review. He then served as a law clerk to the Honorable Judge David G. Trager in the U.S. District Court for the Eastern District of New York. After clerking, he joined the litigation department at Latham & Watkins LLP, and later joined Olshan Frome Wolosky LLP a large established New York City law firm. Before law school, Mr. Barney earned his B.A. from Bowdoin College, where he double majored in Computer Science and Studio Art, and after college he served as a lead database developer for three years at a successful Internet start-up in Washington D.C.

Mr. Barney focuses his practice on class actions and representing individuals in complex litigations. In this practice he has won tens of millions of dollars for his clients. Among other matters, Mr. Barney has fought to stop companies from illegally spamming consumers with unwanted phone calls, has worked to stop companies from illegally obtaining their customers' biometric information (e.g., facial scans and fingerprints), and obtained recovery for numerous victims of data breaches. Mr. Barney has also served as counsel of record for numerous lawsuits involving alleged violations of the Illinois Genetic Information Privacy Act, successfully opposing dispositive motions and defeating improperly raised affirmative defenses.

Mr. Barney is recognized by the New York Legal Aid Society for his outstanding pro bono work representing indigent individuals in matters concerning prisoners' rights, immigration, and special education.

Mr. Barney has published a number of articles concerning a variety of legal issues. These include authoring or co-authoring: *The FBI vs. Apple: What Does the Law Actually Say?,* Inc. Magazine (February 2016); *Can Lawyers Be Compelled to Produce Data They Compile? An Emerging Front in the Trenches of e-Discovery Battles*, Bloomberg BNA (May 2015); *Legal Landscape for Cybersecurity Risk is Changing as Federal Government and SEC Take Action*, Inside Counsel Magazine (May 2015); *Tellabs v. Makor, One Year Later*, Securities Law 360 (July 2008); *Not as Bad as We Thought: The Legacy of Geier v. American Honda Motor Co.in Product Liability Actions,* 70 Brooklyn L. Rev. 949 (Spring 2005). Mr. Barney serves as an adjunct professor at Brooklyn College in New York, teaching Education Law in its graduate studies program, and separately has presented continuing legal education instruction regarding the Foreign Corrupt Practices Act.

Elizabeth Brehm

Senior Partner



Elizabeth Brehm graduated from Boston University with a Bachelor of Science and earned her master's degree from Long Island University at C.W. Post. She attended Hofstra Law School and obtained a Juris Doctorate, graduating *magna cum laude*, in 2008.

After law school, Ms. Brehm spent a year at Winston & Strawn LLP where she focused on products liability litigation. For nine years prior to joining Siri & Glimstad, Ms. Brehm worked for a New York law firm where she focused on antitrust class action lawsuits, health care fraud, and qui tam and whistleblower litigations. Ms. Brehm has been an attorney at Siri & Glimstad for over three years and has handled numerous complex litigation matters, including class action matters.

Walker Moller

Partner



Before law school, Walker Moller worked and volunteered for three years in 15 countries throughout Southeast Asia, Oceania, and Africa. While at Mississippi College School of Law, Walker clerked at the Mississippi Supreme Court and was on the Law Review. He graduated *summa cum laude* in 2014 and earned the highest grade in eight courses. After graduation, Walker clerked for a federal judge at the United States District Court, Western District of Louisiana, where he gained exposure to a large volume of employment discrimination matters, products liability cases, and constitutional litigation.

Walker then worked for the U.S. Army Corps of Engineers from 2015 to 2021, where his practice focused on federal contracts and civil litigation in various administrative courts. Immediately before joining Siri & Glimstad, Walker achieved full dismissal of a lawsuit against the Corps of Engineers that implicated $68M worth of federal contracts.

Michael Connett

Partner



Michael Connett is a partner at Siri & Glimstad LLP where he uses the tools of law to challenge outdated chemical safety standards and misguided medical practices. Mr. Connett is the lead attorney in the groundbreaking lawsuit on water fluoridation that culminated in a federal court concluding that fluoridation "poses an unreasonable risk of reduced IQ in children." This landmark judgment has sparked legislative efforts across the U.S. to end fluoridation. Mr. Connett is currently litigating class action lawsuits against the largest

manufacturers of fluoride toothpaste/mouthwash products for falsely and misleadingly advertising these products as safe for young children. Mr. Connett has studied the impacts of fluoride for over 20 years. He received his law degree magna cum laude from Temple Law School where he served as Editor in Chief of the Temple Law Review.

Tyler J. Bean

Partner



Mr. Bean is widely regarded as one of the nation's leading plaintiff-side data privacy litigators, having been recognized as a top-12 litigator under the age of 40 in the country. Mr. Bean's practice focuses on complex civil litigation and consumer class actions, with a particular emphasis on Data Breach, Internet Surveillance, and Camera Surveillance matters. Over the course of his career, he has played a central role in the successful prosecution of hundreds of data privacy cases, from inception through discovery and final approval, helping to shape outcomes in rapidly evolving areas of law. As the lead attorney of the Firm's Data Privacy Group, Mr. Bean has secured over $150 million in settlement relief for millions of class members nationwide, overseeing all data privacy matters in which the Firm served or is serving as court-appointed lead class counsel and settlement class counsel. His work reflects not only a mastery of the law in these novel and complex spaces, but also the strategic judgment and leadership required to litigate against sophisticated and well-funded defendants.

During law school, Mr. Bean served as Editor for the Oil and Gas, Natural Resources, and Energy Law Journal and was named to the Dean's List, the Faculty Honor Roll, and was a Merit Scholar. He also completed the University of Oklahoma's pro bono and public service work pledge.

Kent. M. Williams

Attorney



Kent M. Williams has over 30 years of experience representing large classes of consumers, employees, and small businesses in antitrust, wage and hour, consumer fraud, data breach, privacy, employment discrimination, securities fraud, trespass, and product liability lawsuits.

Mr. Williams received his J.D. magna cum laude with legal writing honors from the University of Minnesota in 1991, where he was published in the University of Minnesota Law Review and competed against other law schools as a member of Minnesota's Jessup International Law Moot Court Competition Team.

After a summer internship with Jenner & Block in Chicago, Mr. Williams decided to remain in the Twin Cities, where he joined Dorsey & Whitney, one of the largest firms in the Midwest. After a few months, Mr. Williams yearned for more "hands on" experience, so he moved to Opperman Heins & Paquin (now known as Lockridge Grindal Nauen PLLP), a class action boutique where he was responsible for a variety of class and non-class matters. One of his

most memorable experiences at OHP was coordinating the successful defense of the late Dr. John S. Najarian, a renowned surgeon who was accused by the Food and Drug Administration of illegally marketing and selling Minnesota antilymphocyte globulin ("MALG"), an anti-rejection drug that Dr. Najarian had developed into what became the immunosuppressive "gold standard" for transplant surgery.

In 1994, Mr. Williams and four other attorneys formed a new class action firm, Heins Mills & Olson, P.L.C. His practice expanded to include class actions against major manufacturers of infant formula, industrial diamonds, hearing aids, polybutylene pipe, synthetic stucco, and other products. He advocated fiercely for consumers in antitrust cases, winning one of the first-ever contested indirect purchaser class certifications in the country, as well as an appellate court victory in North Carolina that established a private right of action for indirect purchasers in that state. Mr. Williams also represented landowners in class actions alleging trespass against railroads and telecommunications companies for burying fiber optic cable on private property without permission.

A firm believer that "variety is the spice of life," in the mid-2000s, Mr. Williams decided to open a solo practice that allowed him to branch out into other areas of the law, while continuing to represent plaintiffs in class actions and other complex commercial matters. Over the next twenty years, Mr. Williams successfully handled a diversity of probate, family law, land-use, administrative law, criminal law, and employment law matters. During that same time period, he served as trial and/or lead counsel in a number of behemoth class actions brought against Big Pharma, Microsoft, and other large corporations. Mr. Williams is recognized as one of the first lawyers in the country to wage mass arbitration "guerilla warfare" (in the words of one legal commentator) by bringing hundreds of individual wage-and-hour arbitrations against a large, well-known restaurant chain.

More recently, Mr. Williams has expanded his practice to include consumer privacy litigation. He manages the Firm's genetic and biogenetic information privacy litigation group, and he serves as class counsel in a number of privacy cases, including one brought against a well-known online healthcare company. At the same time, Mr. Williams continues to advocate for consumers victimized by price-fixing, monopolization, securities fraud, financial fraud, and other unlawful schemes.

Oren Faircloth

Attorney



Oren Faircloth graduated from McGill University in 2009 with a Bachelor of Arts degree in Political Science. Before attending law school, he served in the armed forces from 2010 to 2011. Mr. Faircloth graduated from Quinnipiac University School of Law, *magna cum laude*, in 2016.

Prior to joining Siri & Glimstad, Mr. Faircloth worked for a boutique law firm where he spearheaded ERISA class action lawsuits against Fortune 500

companies, including: Huntington Ingalls, Rockwell Automation, Raytheon, UPS, U.S. Bancorp, Delta Air Lines, and Sprint. Mr. Faircloth was involved in the prosecution of numerous successful class actions in which over $100 million dollars have been recovered for tens of thousands of employees around the country. In 2022, Mr. Faircloth was recognized by Super Lawyers magazine as a Rising Star in the field of class action.

Mr. Faircloth focuses his practice on class actions and representing individuals in complex litigations. He presently represents individuals who have been denied reimbursement for work-related expenses from their employers, denied sufficient lactation accommodations in the workplace, and denied actuarially equivalent pension benefits. Mr. Faircloth has also represented several individuals on a pro bono basis, negotiating favorable settlements for violations of their constitutional rights.

Wendy Cox

Attorney



Prior to joining Siri & Glimstad, Ms. Cox served for 21 years in the United States Army as an Army Nurse Corps officer and as an Army Judge Advocate. As a nurse corps officer, Ms. Cox worked in several clinical settings to include a pediatric unit, a specialty surgical unit, and an orthopedic surgical unit. During her last year as an Army Nurse Corps officer, she taught Army medics in basic life-saving skills before being selected by the Army to attend law school. After graduating law school in 2005, Ms. Cox prosecuted soldiers, advised on operational law issues, taught Constitutional Law at West Point, and advised senior leaders on a variety of legal issues. Following her retirement from the United States Army in 2018, she went on to continue serving soldiers as an attorney for the Office of Soldiers' Counsel.

Wendy Cox graduated *cum laude* from the State University at Buffalo Law School in New York and *summa cum laude* from Norwich University with a Bachelor of Science in Nursing. She went on to get her Master of Laws (L.L.M.) degree in Military Law in 2008.

Dana Smith

Attorney



Dana Smith is a seasoned litigator. Prior to joining Siri & Glimstad, Ms. Smith focused most of her legal career on personal injury litigation, including representing individuals harmed due to corporate negligence. Ms. Smith is also experienced in various domestic areas of practice, including divorce, high-conflict custody disputes, and child welfare law.

Ms. Smith graduated *cum laude* from the North Carolina Central University School of Law. Additionally, she received her Bachelor of Arts in Romance Languages from the University of North Carolina at Chapel Hill.

Sonjay Singh

Attorney



Sonjay Singh is a seasoned litigator with broad experience in data privacy matters.

Prior to joining Siri & Glimstad, Mr. Singh worked with prominent plaintiffs' firms in the District of Columbia and Pennsylvania, where he brought claims for individuals affected by data privacy violations, predatory lending, defective products, false advertising, institutional abuse, and other corporate misconduct. Mr. Singh has also practiced as a trial lawyer, pursuing personal injury, medical malpractice, defective premises, and other tort cases on behalf of his clients.

Mr. Singh graduated from Temple University's Beasley School of Law with both his J.D. and a certificate in Trial Advocacy and Litigation. During his time in law school, he was active on campus, and served as Vice President of the Student Bar Association. Mr. Singh also competed on Temple's highly-ranked Trial Team, winning the Inter-American Invitational at the University of Puerto Rico among other honors. For his dedication to plaintiffs' representation, Mr. Singh was named the Eisenberg Scholar, a scholarship given yearly to the outstanding student in civil litigation, and received the Trial Program Award for excellence in trial advocacy. Upon graduating, Mr. Singh was inducted into the Rubin Public Interest Society for his commitment to public service.

Mr. Singh is active in the legal community, and served as the 2022-23 Communications Chair for the MSBA Young Lawyers Division. Before starting his legal career, Mr. Singh co-founded a DEI hiring and recruiting startup, and was elected to serve as Democratic Committeeperson for the Townships of Marple and Newtown, PA.

Neil Williams

Attorney



With a robust background in data breach litigation, Mr. Williams is a seasoned legal professional dedicated to protecting the interests of clients in the digital age. Leveraging his extensive experience in cybersecurity law and privacy regulations, he has successfully represented numerous individuals in complex data breach cases. Mr. Williams meticulously navigates the intricate legal landscape surrounding data breaches, providing strategic counsel and vigorous advocacy to achieve favorable outcomes for his clients.

Mr. Williams received his J.D. from Charleston School of Law, where he was awarded CALI Awards on two occasions for the top grade in his class. He also worked alongside several South Carolina Pro Bono Services to ensure that competent legal representation was reaching

the most at need populations in the area. Mr. Williams received his undergraduate degree from the University of South Carolina.

Sonal Jain

Attorney



Sonal Jain has experience in complex commercial litigations as well as class actions. Ms. Jain graduated from the New York University School of Law with an LLM in International Business Regulation, Litigation and Arbitration in 2020 where she gained experience with international dispute resolution. She received her first degree in law (B.A. LL.B.) from ILS Law College, Pune, a prime legal education institution in India. Prior to joining Siri & Glimstad, Ms. Jain held various internships with top-tier law firms in India where she specialized in complex dispute resolution ranging from consumer and corporate litigation to domestic arbitrations.

Jack Spitz

Attorney



Jack R. Spitz is a graduate of Rutgers School of Law where he was a member of the Rutgers Law Record Journal and interned with the Essex County Public Defender's Office. Following law school, he served as Law Clerk for two judges at the Middlesex County Superior Court in New Brunswick, New Jersey. Subsequently, Mr. Spitz defended a wide variety of personal injury and property damage matters, as well as represented Plaintiffs in employment litigation matters. Prior to law school, Mr. Spitz graduated from Clemson University in South Carolina.

Alyssa Tolentino

Attorney



Ms. Tolentino represents consumers in class actions involving data privacy issues. She received her J.D. from St. John's University School of Law where she served as Editor-in-Chief of the New York International Law Review. During law school, Ms. Tolentino also represented low income New Yorkers in their housing, employment, and public benefits disputes through the Economic Justice Clinic.

Albert Asciutto

Attorney



Ms. Albert Asciutto is a skilled litigator with extensive experience in class and collective action matters. At Siri & Glimstad, Mr. Asciutto represents plaintiffs in privacy class action lawsuits, advocating for individuals harmed by negligent or unlawful data security and privacy practices.

Before joining Siri & Glimstad, Mr. Asciutto concentrated his practice on wage-and-hour litigation in state and federal courts nationwide, including claims involving unpaid "off-the-clock" work and negligent or fraudulent pay practices. Mr. Asciutto also worked to safeguard the rights of whistleblowers throughout the United States in qui tam actions brought under the False Claims Act, as well as advocated for employees in cases challenging employers' unlawful practices affecting workplace benefits and retirement security under ERISA. Earlier in his career, Mr. Asciutto gained valuable experience litigating large-scale environmental contamination class actions and managing a wide range of pharmaceutical mass tort matters.

After obtaining his Bachelor of Arts degree from Western Michigan University with dual majors in creative writing and criminal justice, Mr. Asciutto received his Juris Doctor from Wayne State University Law School. Outside of the classroom, Mr. Asciutto served as Managing Editor of The Journal of Law in Society, President of the Medical and Health Law Society, and Vice President of Finance for the Entrepreneurship and Business Law Society. Additionally, Mr. Asciutto gained practical experience in the State of Michigan Appellate Defender Office preparing criminal appellate briefs for incarcerated clients, and as a student attorney in the Legal Advocacy for People with Cancer Clinic at the Barbara Ann Karmanos Cancer Institute. Mr. Asciutto also had the privilege of working as research assistant to late U.S. Senator Carl Levin, where he advocated for the reduction of barriers to treatment for those suffering from Opioid Use Disorder.

Tanner Hilton

Attorney



Tanner R. Hilton is an experienced class action litigator with a focus on data breach and privacy litigation. Mr. Hilton has held multiple leadership roles in data privacy cases in both federal and state courts nationwide and has played a key role in successfully managing numerous class actions from their inception through court-approved settlement. Before joining Siri & Glimstad, Mr. Hilton was an attorney at a class action law firm where he focused primarily on data privacy and securities litigation, while also representing plaintiffs in a variety of consumer protection matters.

Mr. Hilton earned his bachelor's degree in political science from Texas A&M University in 2019 and his JD from Oklahoma City University in 2022. During law school, Mr. Hilton competed on two national moot court teams, including the NALSA Moot Court Competition Team and the Hispanic National Bar Association Moot Court Competition Team. He also received the CALI Award for Secured Transactions and was inducted into the Order of the Barristers in 2022.

Kennedy Brian

Attorney



Ms. Kennedy Brian is an accomplished attorney in the data privacy litigation sector who practices in state and federal courts across the nation. She has played a pivotal role in obtaining favorable decisions for data breach victims throughout the United States. Ms. Brian has successfully worked on dozens of data privacy cases and has spoken on various data privacy topics at conferences across the nation.

During law school, Ms. Brian was a member of the American Indian Law Review, received awards for trial techniques and moot court, and was listed on the Dean's Honor Roll.

Tammana Malik

Attorney



Tammana Malik is a dual-qualified attorney with extensive experience navigating U.S. and international privacy laws. At Siri & Glimstad, Ms. Malik represents plaintiffs in privacy and internet surveillance class action lawsuits.

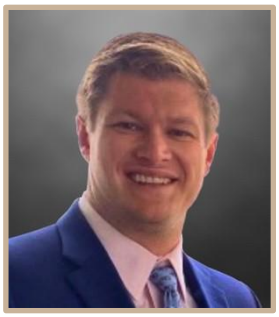
Prior to joining Siri & Glimstad, Ms. Malik served as outside counsel to corporate clients, advising on federal and state laws governing consumer outreach and advocating for increased accountability and transparency in digital data sharing and privacy practices.

Ms. Malik earned her LL.M. in Media, Entertainment, and Technology Law from UCLA School of Law. During her time at UCLA, she co-authored a comprehensive report to guide public and private stakeholders on the best practices for content moderation and user safety in extended reality technologies (XR), which was published by the UCLA Institute for Technology, Law & Policy. Ms. Malik also served as a Board Member for the Art Law Society and was actively involved with the Entertainment Law Association.

Ms. Malik received her B.A. LL.B. (Hons.) from National Law University, Delhi, in India.

Zane Johnson

Attorney



Zane Johnson is a litigator with broad experience in class actions and commercial litigation. He represents individuals and classes of consumers in complex litigation in federal courts nationwide. His work at Siri & Glimstad focuses on assisting consumers impacted by the improper sharing of their private information, including matters involving data privacy, consumer protection statutes, and emerging technology-related harms.

Prior to joining Siri & Glimstad, Mr. Johnson brought claims for individuals affected by violations of the Employee Retirement Income Security Act (ERISA) with a prominent plaintiff's law firm, successfully advocating for plan participants in disputes involving fiduciary breaches and unlawful plan practices. Mr. Johnson has also practiced as a corporate litigator, helping to resolve contract disputes, business tort claims, and high-stakes commercial conflicts, and as an intellectual property attorney, helping clients secure and enforce patent and trademark rights through litigation and strategic portfolio management.

Mr. Johnson earned his J.D., with honors, from the University of Connecticut School of Law with a certificate in intellectual property. During his time in law school, he earned CALI Excellence for the Future Awards in Contracts, Lawyering Process, and Case Studies in Compliance Systems, reflecting his academic distinction and commitment to legal excellence. Prior to and while attending law school, Mr. Johnson worked as a software engineer for multiple Fortune 500 companies. Mr. Johnson has experience designing and building business-critical software from the ground up at every level of the software development stack, including hands-on experience with various user analytics tools, which provides him with a unique technical fluency in cases involving digital platforms, data tracking technologies, and complex software systems.

Outside the office, Mr. Johnson volunteers to coach youth hockey and lacrosse teams, demonstrating his commitment to mentorship, teamwork, and community involvement.

William Payne

Counsel



With over 15 years of experience in employment law in both state and federal courts nationwide, Mr. Payne has built a career representing clients in complex matters, including class and collective actions involving the FLSA, ERISA, Title VII, ADA, ADEA, FMLA, and state and federal whistleblower statutes. Mr. Payne has gained experience in litigation, advice, and leadership, not only through private practice, but also from his time serving as in-house counsel for residential solar companies operating across multiple states. In those roles, he managed employment and

consumer litigation, negotiated commercial contracts, and ensured regulatory compliance. Before entering the legal field, Mr. Payne was a high school teacher and coach, and earlier worked in print journalism—experiences that shaped his communication style, strategic thinking, and dedication to advocacy.

AJ Garcia

Attorney



AJ Garcia is an experienced litigator focusing his practice on privacy class action lawsuits. Prior to Joining Siri & Glimstad, Mr. Garcia worked for a plaintiff-side firm handling various civil litigation matters, including catastrophic injury, premises liability, and insurance matters.

Mr. Garcia earned his J.D. from Temple University's Beasley School of Law on a merit scholarship. During his time in law school, Mr. Garcia interned for the honorable Charles Cunningham III of the Philadelphia Court of Common Pleas and was a liaison to the Honorable Timothy Rice of the US. District Court for the Eastern District of PA. Mr. Garcia also served as a mediator for Philadelphia's housing court and interned for Citibank, providing guidance on fair lending compliance related to alternative data and AI. Prior to law school, Mr. Garcia obtained dual degrees in finance and economics from Michigan State University.

Nathaniel Barry

Attorney



Nathaniel Barry is an attorney in the Firm's Data Privacy Group. He graduated with honors from the University of Notre Dame Law School in 2024, where he served as President of the Tax Law Society, competed on the Mock Trial Team, worked with the Eviction Clinic, and served as a research assistant studying charitable contributions of digital assets, including cryptocurrency. Mr. Barry received both a Faculty Award for Excellence and the International Academy of Trial Lawyers Award for distinguished achievement in the art of advocacy.

Following law school, Mr. Barry joined the Elkhart County Prosecutor's Office as a Deputy Prosecuting Attorney. In that role, he managed hundreds of criminal cases from charging through plea negotiations, contested hearings, and trial. He has tried seven felony jury trials, each resulting in a conviction.

Notable Class Actions Handled By Siri & Glimstad LLP

Hefstetler, et al. v. Upstream Rehabilitation, Inc., et al.
Case No. 2024-902563.00 (AL Cir. Ct., Jefferson Cty.)
Final approval granted for a settlement involving roughly 545,000 class members and a $4,304,898.50 non-reversionary settlement fund.

Reedy, et al. v. Everlywell, Inc., et al.
Case No. 1:24-cv-02713 (N.D. Ill.)
Final approval granted for a settlement involving 2 million class members and a $5,000,000 non-reversionary settlement fund.

In re Retina Group of Washington Data Security Incident Litigation
Case No. 8:24-cv-00004 (D. Md.)
Final approval granted for a settlement involving 450,000 class members and a $3.6 million non-reversionary settlement fund.

Terrance Rosa, et al. v. Brightline, Inc.
Case No. 24-md-03090 (S.D. Fla.)
Final approval granted for a settlement involving over 1 million class members and a $7,000,000 non-reversionary settlement fund.

In re Berry, Dunn, McNeil & Parker Data Security Incident Litigation
Case No. 2:24-cv-00146 (D. Me.)
Final approval granted for a settlement involving 2 million class members and a $7.25 million non-reversionary settlement fund.

Corona-Cantu v. Ingo Money, Inc.
Case No. 1:24-cv-03023 (N.D. Ga.)
Final approval granted for a settlement involving 27,000 class members and a $1.5 million non-reversionary settlement fund.

Buchanan v. Sirius XM Radio, Inc.
Case No. 3:17-cv-00728 (N.D. Tex.)
Appointed co-lead class counsel in a case alleging violations of the TCPA, which resulted in a settlement of $25,000,000, plus free satellite radio service, to a class of 14.4 million members.

Thomas v. Dun & Bradstreet Credibility Corp. Case No. 15-cv-3194 (S.D. Cal.)
Appointed co-lead class counsel in a case alleging violations of the TCPA which resulted in a settlement of $10,500,000.

Gatto v. Sentry Services, Inc., et al.
Case No. 13 CIV 05721 (S.D. N.Y.)
Appointed co-lead class counsel in a case involving ERISA claims relating to an ESOP which resulted in a settlement of $11,138,938.

Kindle v. Dejana
Case No. 14-cv-06784 (E.D. N.Y.)
Appointed co-lead trial counsel for plaintiffs in an ERISA matter filed as a class action involving breaches of fiduciary duty related to the management and termination of an ESOP, which settled after the beginning of trial for $1,080,000 for the class.

MacNaughton v. Young Living Essential Oils, LC,
67 F.4th 89 (2d Cir. 2023)
Successfully reversed motion to dismiss, creating a significant precedent regarding the definition of "puffery" in N.Y. false advertising cases.

MacNaughton v. Young Living Essential Oils, LC,
Case No. 24LA0329 (Cir. Ct. Ill.)
Received final approval of settlement in false advertising class action valued at $10,000,000.

Carter, et al. v. Vivendi Ticketing US LLC d/b/a See Tickets
Case No. 8:22-cv-01981 (C.D. Cal.)
Final approval granted, appointing firm as sole class counsel, in a data breach class action settlement involving 437,310 class members and a $3,000,000 non-reversionary settlement fund.

Medina v. Albertsons Companies, Inc.
Case No. 1:23-cv-00480 (D. Del.)
Obtained final approval of a class settlement involving 33,000 class members and a $750,000 non-reversionary settlement fund.

In re Sovos Compliance Data Security Incident Litigation
Case No. 1:23-cv-12100-AK (D. Mass.)
Obtained final approval of a class settlement that includes a non-reversionary settlement fund of $3,534,128.50 involving 490,000 individuals, and separate from the settlement fund, requires the defendant to pay for data security improvements.

Owens v. US Radiology Specialists, Inc.,
Case No. 22 CVS 17797 (N.C. Super. Ct.)
Received final approval for settlement in data breach involving 1,309,429 customer's private health information, creating non-reversionary settlement fund of $5,050,000 to compensate class members.

In re: Planet Home Lending, LLC Data Breach
Case No. 3:24-cv-127 (D. Conn.)
Final approval granted for data breach settlement affecting 285,000 individuals, which will create a non-reversionary settlement fund valued at $ 2,425,000.

In re: Vivendi Ticketing US LLC, d/b/a See Tickets Data Security Incident
Case No. 2:23-cv-07498 (C.D. Cal.)
Final approval of settlement in second data breach affecting 323,498 individuals, where the settlement agreement calls for the creation of a non-reversionary settlement fund in the amount of $3,250,000.

Fortra File Transfer Software Data Security Breach Litigation
Case No. 24-MD-03090-RAR (S.D. Fl.).
Appointed to leadership team in nationwide multi-district litigation concerning data breach affecting more than 4,000,000 individuals' personal and health information.

In re UNITE HERE Data Security Incident Litigation
Case No. 1:24-cv-01565-JSR (S.D.N.Y.)
Obtained final approval of data breach settlement affecting roughly 790,000 individuals, creating a non-reversionary settlement fund of $6,000,000 to compensate class members.

Exhibit B



MILBERG.

FIRM RESUME

Milberg PLLC ("Milberg") is an AV-rated international law firm with more than 100 attorneys and offices across the United States, the European Union, and South America.

Milberg prides itself on providing thoughtful and knowledgeable legal services to clients worldwide across multiple practice areas. The firm represents plaintiffs in the areas of antitrust, securities, financial fraud, consumer protection, automobile emissions claims, defective drugs and devices, environmental litigation, financial and insurance litigation, and cyber law and security.

For over 50 years, Milberg and its affiliates have been protecting victims' rights. We have recovered over $50 billion for our clients. Our attorneys possess a renowned depth of legal expertise, employ the highest ethical and legal standards, and pride ourselves on providing stellar service to our clients. We have repeatedly been recognized as leaders in the plaintiffs' bar and appointed to numerous leadership roles in prominent national mass torts and class actions.

Milberg challenges corporate wrongdoing through class action, mass tort, consumer and shareholder right services, both domestically and globally.

In the United States, Milberg currently holds more than 100 court-appointed full- and co-leadership positions in state and federal courts across the country. Our firm has offices in California, Florida, Georgia, Illinois, New Jersey, New York, Tennessee, Washington, Washington D.C., and Puerto Rico. Milberg's commitment to its clients reaches beyond the United States, litigating antitrust, securities, and consumer fraud actions in Europe and South America, with offices located in the United Kingdom, and the Netherlands.

Milberg prides itself on providing excellent service worldwide.

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

"A powerhouse that compelled miscreant and recalcitrant businesses to pay billions of dollars to aggrieved shareholders and customers."
- THE NEW YORK TIMES

PRACTICE AREAS

SECURITIES FRAUD

Milberg pioneered the use of class action lawsuits to litigate claims involving investment products, securities, and the banking industry. Fifty years ago, the firm set the standard for case theories, organization, discovery, methods of settlement, and amounts recovered for clients. Milberg remains among the most influential securities litigators in the United States and internationally.

Milberg and its attorneys were appointed Lead Counsel and Co-Lead Counsel in hundreds of federal, state, and multidistrict litigation cases throughout its history.

ANTITRUST & COMPETITION LAW

For over fifty years, Milberg's Antitrust Practice Group has prosecuted complex antitrust class actions against defendants in the healthcare, technology, agriculture, and manufacturing industries engaged in price-fixing, monopolization and other violations of antitrust law and trade restraints.

FINANCIAL LITIGATION

For over fifty years, Milberg's Antitrust Practice Group has prosecuted complex antitrust class actions against defendants in the healthcare, technology, agriculture, and manufacturing industries engaged in price-fixing, monopolization and other violations of antitrust law and trade restraints.

CONSUMER PROTECTION

Milberg's Consumer Protection Practice Group focuses on improving product safety and protecting those who have fallen victim to deceptive marketing and advertising of goods and services and/or purchased defective products. Milberg attorneys have served as Lead Counsel and Co-Lead Counsel in hundreds of federal, state, and multidistrict litigation cases alleging the sale of defective products, improper marketing of products, and violations of consumer protection statutes.

DANGEROUS DRUGS & DEVICES

Milberg is a nationally renowned firm in mass torts, fighting some of the largest, wealthiest, and most influential pharmaceutical and device companies and corporate entities in the world. Our experienced team of attorneys has led or co-led numerous multidistrict litigations of defective drugs and medical devices.

EMPLOYMENT & CIVIL RIGHTS

Milberg's Employment & Civil Rights attorneys focus on class actions and individual cases nationwide arising from discriminatory banking and housing practices, unpaid wages and sales commissions, improperly managed retirement benefits, workplace discrimination, and wrongful termination.

ENVIRONMENTAL LITIGATION & TOXIC TORTS

Milberg's Environmental Litigation & Toxic Torts Practice Group focuses on representing clients in mass torts, class actions, multi-district litigation, regulatory enforcement, citizen suits, and other complex environmental and toxic tort matters. Milberg and its attorneys have held leadership roles in all facets of litigation in coordinated proceedings, with a particular focus on developing the building blocks to establish general causation, which is often the most difficult obstacle in an environmental or toxic tort case.

STATE & LOCAL GOVERNMENTS

Milberg attorneys are dedicated to defending the Constitutional and statutory rights of individuals and businesses that are subjected to unlawful government exactions and fees by state and local governments or bodies.

CYBERSECURITY & DATA PRIVACY

Milberg is a leader in the fields of cyber security, data breach litigation, and biometric data collection, litigating on behalf of clients – both large and small – to change data security practices so that large corporations respect and safeguard consumers' personal data.

APPELLATE

Consisting of experienced appellate advocates and former law clerks who understand how best to present compelling arguments to judges on appeal and secure justice for our clients beyond the trial courts, Milberg's Appellate Practice Group boasts an impressive record of success on appeal in both state and federal courts.

LEADERSHIP ROLES

In re: Google Play Consumer Antitrust Litigation
In re: Elmiron (Pentosan Polysulfate Sodium) Products Liability Litigation
In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices & Products Liability Litigation
In re: Blackbaud Inc., Customer Data Breach Litigation
In re: Paragard IUD Products Liability Litigation
In re: Seresto Flea & Tick Collar, Marketing Sales Practices & Product Liability Litigation
In re: All-Clad Metalcrafters, LLC, Cookware Marketing and Sales Practices Litigation
In re: Allergan Biocell Textured Breast Implant Products Liability Litigation
In re: Zicam Cold Remedy Marketing, Sales Practices and Products Liability Litigation
In re: Guidant Corp. Implantable Defibrillators Product Liability Litigation
In re: Ortho Evra Products Liability Litigation
In re: Yasmin and YAZ (Drospirenone) Marketing, Sales Practices and Products Liability Litigation
In re: Kugel Mesh Hernia Patch Products Liability Litigation
In re: Medtronic, Inc. Sprint Fidelis Leads Products Liability Litigation
In re: Stand 'N Seal Products Liability Litigation
In re: Chantix (Varenicline) Products Liability Litigation
In re: Fosamax (alendronate Sodium) Products Liability Litigation
In re: Benicar (Olmesartan) Products Liability Litigation
In re: Onglyza (Saxagliptin) & Kombiglyze Xr (Saxagliptin & Metformin) Products Liability Litigation
In re: Risperdal and Invega Product Liability Cases
In re: Mirena IUS Levonorgestrel-Related Products Liability Litigation
In re: Incretin-based Therapies Product Liability Litigation
In re: Reglan/Metoclopromide
In re: Levaquin Products Liability Litigation
In re: Zimmer Nexgen Knee Implant Products Liability Litigation
In re: Fresenius Granuflo/NaturaLyte Dialysate Products Liability Litigation
In re: Propecia (Finasteride) Products Liability Litigation
In re: Transvaginal Mesh (In Re C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation; In Re Ethicon, Inc., Pelvic Repair System Products Liability Litigation; In Re Boston Scientific, Inc., Pelvic Repair System Products Liability; In Re American Medical Systems, Pelvic Repair System Products Liability, and others)
In re: Fluoroquinolone Product Liability Litigation
In re: Depuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation
In re: Recalled Abbott Infant Formula Products Liability Litigation
Home Depot, U.S.A., Inc. v. Jackson
Webb v. Injured Workers Pharmacy, LLC

NOTABLE RECOVERIES

$4 Billion Settlement

In re: Prudential Insurance Co. Sales Practice Litigation

$3.2 Billion Settlement

In re: Tyco International Ltd., Securities Litigation

$1.14 Billion Settlement

In Re: Nortel Networks Corp. Securities Litigation

$1 Billion-plus Trial Verdict

Vivendi Universal, S.A. Securities Litigation

$1 Billion Settlement

NASDAQ Market-Makers Antitrust Litigation

$1 Billion Settlement

W.R. Grace & Co.

$1 Billion-plus Settlement

Merck & Co., Inc. Securities Litigation

$775 Million Settlement

Washington Public Power Supply System Securities Litigation

$586 Million Settlement

In re: Initial Public Offering Securities Litigation

LOCATIONS

PUERTO RICO
1311 Avenida Juan Ponce de León
San Juan, Puerto Rico 00907

CALIFORNIA
280 South Beverly Drive, Penthouse
Beverly Hills, California 90212

FLORIDA
333 SE 2nd Avenue, Suite 2000
Miami, Florida 33131

ILLINOIS
227 W. Monroe Street, Suite 2100
Chicago, Illinois 60606

NEW JERSEY
1 Bridge Plaza North, Suite 675
Fort Lee, New Jersey 07024

NEW YORK
100 Garden City Plaza, Suite 408
Garden City, New York 11530

TENNESSEE
800 S. Gay Street, Suite 1100
Knoxville, Tennessee 37929

WASHINGTON
1420 Fifth Ave, Suite 2200
Seattle, Washington 98101

17410 133rd Avenue, Suite 301
Woodinville, Washington 98072

WASHINGTON, D.C.
5335 Wisconsin Avenue NW, Suite 440
Washington, D.C. 20015

NETHERLANDS

UNITED KINGDOM



Exhibit C

LaukaitisLaw

NATIONAL CLASS ACTION ATTORNEYS

FIRM RESUME

954 Avenida Ponce De León
Suite 205, #10518
San Juan, Puerto Rico 00907

www.laukaitislaw.com
(215) 789 - 4462

LaukaitisLaw

Firm Overview

Laukaitis Law is a national plaintiffs' class action and complex litigation firm dedicated to protecting consumers and holding corporations accountable for conduct that causes widespread harm. The firm's practice focuses on consumer class actions and complex litigation arising from data privacy and cybersecurity incidents, product safety concerns, product recalls, false advertising, deceptive business practices, consumer fraud, and other forms of corporate misconduct.

Founded by Kevin Laukaitis, a Philadelphia native, Pennsylvania attorney, and graduate of Temple University Beasley School of Law, the firm was established on the belief that consumers deserve experienced, strategic, and efficient representation when large corporations fail to protect the interests of the individuals they serve. Under Mr. Laukaitis' leadership, Laukaitis Law has developed a nationwide consumer litigation practice handling hundreds of active matters and representing consumers throughout the United States. The firm has several attorneys and support staff experienced in litigating diverse class action cases.

The firm presently serves in court-appointed leadership roles in multiple complex privacy and data breach class actions pending before the United States District Court for the Northern District of Illinois and elsewhere within the Seventh Circuit. The firm's attorneys have been appointed to leadership positions and have served as lead or co-lead counsel, and in other leadership roles, in complex litigation involving data breaches, privacy violations, product safety concerns, deceptive business practices, false advertising, and emerging consumer protection issues. Through strategic case development and thoughtful litigation management, the firm has built a reputation for identifying and pursuing matters that raise significant public-interest concerns and meaningfully impact a wide range of consumers. The firm has substantial human, technological, and financial resources to prosecute complex class action litigation from investigation through class certification, summary judgment, trial, and appeal.

Laukaitis Law regularly collaborates with many of the nation's leading plaintiffs' firms in complex litigation, multidistrict proceedings, and coordinated actions. Through unwavering advocacy, practical litigation management, and a commitment to accountability, Laukaitis Law continues to pursue litigation that protects consumers, promotes product safety, safeguards privacy, and drives meaningful corporate change.

Leadership Appointments & Significant Matters

Since Laukaitis Law's founding, Mr. Laukaitis and his firm have served in prominent court-appointed leadership roles as class counsel or on executive committees for class actions nationwide. Representative court-appointed leadership appointments include the following:

- **Counts v. Arkk Food Company**, No. 1:23-cv-00236 (N.D. Ill.) (Court-appointed Class Counsel in consumer products class action resulting in a $2 million common fund settlement);
- **Mercado v. Verde Energy USA, Inc.**, No. 1:18-cv-02068 (N.D. Ill.) (Court-appointed Co-Lead Counsel in a $7 million common-fund settlement on behalf of a nationwide class of consumers overcharged for energy services);
- **In re Seresto Flea & Tick Collar Mktg., Sales Practices & Prods. Liab. Litig.**, No. 1:21-cv-04447 (N.D. Ill.) (Court-Appointed Executive Committee member in $15 million class settlement concerning consumer-safety claims).
- **Vela, et al. v. AMC Networks Inc.**, No. 1:23-cv-02524-ALC (S.D.N.Y.) (Court-appointed Class Counsel in Video Privacy Protection Act litigation resulting in an $8 million common fund settlement).
- **McNally v. Infosys McCamish Systems, LLC**, No. 1:24-cv-00995 (N.D. Ga.) (Court-appointed Co-Lead Class Counsel in data breach litigation resulting in a $17.5 million common fund settlement).
- **Boyd v. Prudential Financial, Inc.**, No. 2:24-cv-6818 (D.N.J.) (Court-appointed Co-Lead Class Counsel in data breach litigation affecting approximately 2.5 million individuals).

Attorney Bios



Kevin Laukaitis

Founder & Managing Attorney

Kevin Laukaitis is the Founder and Managing Attorney of Laukaitis Law, where he focuses his practice on complex litigation involving consumer protection, data privacy and cybersecurity, product liability, product recalls, false advertising, and other matters arising from corporate misconduct.

For more than fifteen years, Mr. Laukaitis has represented consumers in class actions and other complex litigation throughout the United States. Courts throughout the country have appointed Mr. Laukaitis to leadership positions in data privacy, cybersecurity, consumer protection, and product safety litigation, recognizing his experience in case development, litigation management, and coordination of complex proceedings.

Mr. Laukaitis has developed particular experience in data privacy and cybersecurity litigation, product safety and recall litigation, and consumer protection matters involving deceptive marketing and unfair business practices. He has been appointed to leadership positions in significant litigation arising from some of the nation's most substantial data breaches and consumer controversies, and regularly collaborates with leading plaintiffs' firms throughout the country in complex litigation.

Mr. Laukaitis played significant roles in class actions that helped secure hundreds of millions of dollars in recoveries for consumers nationwide. His experience includes litigation involving consumer fraud, deregulated energy markets, data privacy, cybersecurity incidents, defective products, and product recalls. Throughout his career, he has been involved in all phases of litigation, including investigation,

discovery, class certification, dispositive motion practice, mediation, settlement negotiations, and trial preparation.

Before founding Laukaitis Law LLC, Mr. Laukaitis gained experience in cutting-edge data privacy class actions, as part of the plaintiffs' attorney team that served as Co-Lead Trial Counsel, representing 68,000 individuals whose statutory rights were violated by the public dissemination of their criminal record history information. Mr. Laukaitis and his team prevailed in a jury trial, achieving an unprecedented settlement for Pennsylvania inmates booked or otherwise detained at the Bucks County Correctional Facility between 1938 and June 18, 2013. The case, *Taha v. Bucks County*, No. 12-cv 6867 (E.D. Pa.), is considered the first class action lawsuit in the United States to proceed to trial on the impact of digital criminal stigma and a government's statutory duties to protect.

As founder of Laukaitis Law, Mr. Laukaitis has built a national practice dedicated to protecting consumers, promoting product safety, safeguarding privacy, and holding corporations accountable when their conduct causes widespread harm. Courts have repeatedly entrusted him and his firm with leadership responsibilities because of his commitment to thoughtful advocacy, practical litigation management, and meaningful contributions to the matters in which he serves.

Education
Temple University Beasley School of Law, J.D.
Drexel University, B.S., Business Administration

Admissions: Pennsylvania, New Jersey, Eastern District of Pennsylvania, District of New Jersey



Andreas E. Moffett

Of Counsel

Andreas E. Moffett concentrates his practice on product liability, product recalls, consumer protection, false advertising, and complex litigation.

As a member of Laukaitis Law's litigation team, Andreas plays a significant role in the firm's nationwide consumer litigation practice. His work includes case investigation, motion practice, discovery, class certification briefing, and strategic case development across a broad range of matters involving product safety, consumer protection, and corporate accountability.

Andreas has developed particular experience in product liability and product recall litigation, including matters involving consumer products, children's products, household goods, and alleged product safety defects. He also contributes to litigation involving false advertising, deceptive business practices, and other consumer protection claims.

Before joining Laukaitis Law, Andreas practiced at Arnold & Porter, where he worked on sophisticated litigation matters involving complex legal and factual issues. His experience combines large-firm litigation training with a practical understanding of plaintiffs' litigation and consumer advocacy. Today, he works

across the firm's active docket and contributes to all phases of litigation, helping advance matters from investigation through resolution.

Education
New York University School of Law, J.D.
The College of William & Mary, B.A., summa cum laude

Admissions: District of Columbia



Natalia Perez Del Moral

Attorney

Natalia Perez Del Moral concentrates her practice on consumer protection, data privacy, cybersecurity, and complex litigation.

Natalia plays a significant role in the firm's nationwide consumer litigation practice and contributes to all phases of litigation, including motion practice, discovery, case development, mediation preparation, and settlement-related proceedings. Her work regularly involves matters arising from data breaches, privacy violations, consumer protection statutes, and other forms of corporate misconduct.

She has developed experience across a broad range of complex litigation matters and is particularly valuable in coordinating discovery efforts, analyzing legal and factual issues, preparing substantive briefing, and supporting mediation and settlement processes. Her ability to manage complex litigation demands across multiple matters makes her an integral member of the firm's litigation team.

Before joining Laukaitis Law, Natalia gained experience in complex litigation and class action matters at Napoli Shkolnik. Her background combines practical litigation experience with a strong understanding of the procedural and strategic demands of complex litigation.

Education
Inter American University School of Law, J.D.
Inter-American University of Puerto Rico, B.B.A., Finance

Admissions: District of Columbia



Maria Cristina Torres Short

Attorney

Maria Cristina Torres Short concentrates her practice on complex litigation, consumer protection, class actions, and federal court matters.

At Laukaitis Law, Maria Cristina contributes to the firm's nationwide consumer litigation practice through legal research, complaint review, pleading development, motion practice, and litigation strategy. She works with the firm's attorneys and litigation team to evaluate claims, develop cases, and prepare substantive filings across active matters.

Before joining Laukaitis Law, Maria Cristina practiced at O'Neill & Borges LLC, where she represented clients in commercial and civil litigation in the United States District Court for the District of Puerto Rico and in appellate matters before the United States Court of Appeals for the First Circuit. Her experience includes contract disputes, federal motion practice, procedural and jurisdictional issues, appellate filings, and coordination with national counsel. Her background provides her with experience handling matters at both the trial and appellate levels of federal litigation.

Maria Cristina earned her J.D. from the Inter American University of Puerto Rico School of Law, where she participated in litigation and advocacy competitions representing the law school.

Education
Inter American University of Puerto Rico School of Law, J.D.

Admissions: Puerto Rico

Representative Practice Areas

- Data Privacy & Cybersecurity
- Consumer Protection
- False Advertising
- Product Recall Litigation
- Product Liability
- Wiretapping & Tracking Technology Litigation
- Emerging Technology Consumer Litigation
- Consumer Fraud

Exhibit D

chestnut cambronne
ATTORNEYS AT LAW

CHESTNUT CAMBRONNE FIRM RESUME

For over 50 years, Chestnut Cambronne PA has been representing clients in class action litigation both in the Twin Cities area and at a national level. Since its inception, Chestnut Cambronne has been engaged in complex litigation throughout the country and has successfully both prosecuted and defended class litigation addressing substantive legal questions in the fields of data security breaches, securities, ERISA, banking, antitrust, and consumer protection law. Representative class action cases in which the firm and its members have been involved with over the past several years include:

In Re: Change Healthcare, Inc. Customer Data Security Breach Litig., No. 24-md-03108 (D. Minn.). A pending multi-district class action against Change Healthcare and United Healthcare, Inc. This is one of the biggest data breaches in United States history. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel over the patient track.

In re: Berry, Dunn, McNeil & Parker Data Security Incident Litigation, Case No. 2:24-cv-00146 (D. Me.). A pending class action against Berry, Dunn, McNeil & Parker, LLC, a Maine-based accounting firm, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Signature Performance, Case No. 8:24-cv-00252-BCB-RCC (D. Neb.). A pending class action against Signature performance, a Nebraska-based health consulting firm, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Loancare Data Breach Litigation, Case No. 3:23-cv-01508 (M.D. Fla.). A pending class action against Loancare, Inc., a Florida-based mortgage provider, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re ESO Solutions, Inc. Data Breach Litigation, Case No. 1:23-cv-01557 (W.D. Tex.). A pending class action against ESO Solutions, Inc., a Texas-based hospital software solutions provider, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Cahill v. Memorial Heart Institute, LLC, Case No. 1:23-cv-168 (E.D. Tenn.). A pending class action against Memorial Heart Institute, a Tennessee-based healthcare network, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Clauson v. Arrowhead Regional Computing Consortium, Case No. 24-cv-131 (D. Minn.). A pending class action against Arrowhead Regional Computing Consortium, a Minnesota-based payroll service provider. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Peoples Bank, as a Successor to Limestone Bank, Data Breach Litig., No. 2023-cv-03043 (S.D. Ohio). A pending class action against Peoples Bank, an Ohio-headquartered bank, alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Interim Co-Lead Counsel.

In re Weirton Medical Center Data Breach Litigation, No. 5:24-cv-61 (N.D.W.Va.). A pending class action against Weirton Medical Center, a West Virginia-based hospital network, alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Interim Co-Lead Counsel.

In re Cinfed Data Breach Litigation, No. 23-cv-00776 (S.D. Ohio). A pending class action against Cinfed Credit Union, a Cincinnati-based credit union, alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Interim Co-Lead Counsel.

In re R&B Corporation of Virginia d/b/a Credit Control Corporation, Case No. 4:23-cv-00066-JKW-RJK (E.D. Va.). A pending class action against a R&B Corporation of Virginia, a Virginia-based collections company, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re: Group Health Plan Litigation, Case No. 23-cv-00267 (D. Minn.). A pending class action against Group Health Plain, a Minnesota-based healthcare network, alleging wiretapping claims stemming from a Facebook pixel. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Hightower v. Receivables Performance Management, LLC, No. 2:22-cv-01683 (W.D. Wash.). A pending class action on behalf of a putative class of consumers against Receivables Performance Management, LLC, a Washington-based debt collection company, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re OrthoAlaska Data Breach Litigation, No. 3:23-cv-00242 (D. Alaska). A pending class action against Orthoalaska, an Alaska-based orthopedic clinic, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Regents of the University of Minnesota Data Litigation, Case No. 27-cv-23-14056 (Hennepin County, Minnesota). A pending class action against the University of Minnesota, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed to the Interim Plaintiffs' Steering Committee.

In re DISH Network Data Breach Security Litigation, Case No. 1:23-cv-01168 (D.Col.). A pending class action against DISH Network, a Colorado-based cable company, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Whitworth Data Breach Security Litigation, Case No. 2:23-cv-00179-SAB (E.D. Wash.). A pending class action against Whitworth University, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Rasmussen, et al., v. Uintah Health Care Basin, 2:23-cv-0322 (Dt. Ut.). A pending class action on behalf of patietns against healthcare network Uintah Health Care Basin, a Utah-based healthcare network, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Johnson v. Yuma Regional Medical Center, No. 2:22-cv-01061 (D. Ariz.). A pending class action on behalf of a putative class of consumers against Yuma Regional Medical Center, an Arizona healthcare network, and related entities alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Anderson v. Fortra LLC, No. 23-cv-00533 (D. Minn.). A pending class action on behalf of a putative class of consumers against Fortra LLC, a cybersecurity vendor, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In Re: Netgain Technology, LLC, Consumer Data Breach Litigation, No. 21-cv-1210-SRN-LIB (D. Minn.). A pending class action on behalf of a putative class of consumers against Netgain Technology alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Hale, et al., v. ARcare, Inc., No. 3:22-cv-00117 (E.D. Ark.). A pending class action on behalf of a putative class of consumers against ARcare, an Arkansas healthcare network, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re CCM Health Data Security Litigation, Case No. 12-cv-24-169 (Chippewa County). A pending class action on behalf of a putative class of patients against CCM Health, a Minnesota-based healthcare network, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Tift Regional Health System, Inc. Data Breach Litig., No. 2023cv0313 (Tift County, Georgia). A pending class action on behalf of a putative class of patients against Tift Regional Health System, a Georgia-based healthcare network, alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Rodriguez v. Mena Regional Hospital Commission d/b/a Mena Regional Health System, No. 2:23-cv-2002 (W.D. Ark.). A pending class action on behalf of a putative class action on behalf of medical patients against Mena Regional hospital Commission, an Arkansas Healthcare Network alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

DeSue v. 20/20 Eye Care Network, Inc., No. 21-cv-61275-RAR (S.D. Fla.). A settled class action on behalf of a putative class of consumers against 20/20 Eye Care Network alleging negligence and other claims in a data security breach. Bryan L. Bleichner was count appointed as Interim Co-Lead Counsel.

Baker v. Parkmobile, LLC, No. 21-cv-2181-SCJ (N.D. Ga.). A pending class action on behalf of a putative class of consumers against Parkmobile, LLC alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed to the Interim Plaintiffs' Steering Committee.

Garrett v. Herff Jones, LLC, No. 21-cv-01329-TWP-DLP (S.D. Ind.). A settled class action on behalf of a putative class of consumers against Herff Jones alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re EyeMed Vision Care, LLC Data Security Breach Litigation, No. 21-cv-00036-DRC (S.D. Ohio). A pending class action on behalf of a putative class of consumers against EyeMed alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Luxottica of America, Inc. Data Security Breach Litigation, No. 20-cv-00908-MRB (S.D. Ohio). A pending class action on behalf of a putative class of consumers against Luxottica alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

Greenstate Credit Union v. Hy-Vee, Inc., No. 20-cv-00621-DSD-DTS (D. Minn.). A settled class action on behalf of a putative class of financial institutions against Hy-Vee alleging negligence and violations of the Minnesota Plastic Card Security Act in a data security breach. Bryan L. Bleichner served as co-counsel.

Village Bank v. Caribou Coffee Company, Inc., No. 19-cv-01640-JNE-HB (D. Minn.). A settled class action on behalf of a putative class of financial institutions against Hy-Vee alleging negligence and violations of the Minnesota Plastic Card Security Act in a data security breach. Bryan L. Bleichner served as court appointed settlement class counsel.

In re WaWa, Inc. Data Security Litig., No. 19-cv-6019-GEKP (E.D. Pa.). A pending class action on behalf of a putative class of financial institutions against WaWa, Inc. alleging negligence and other claims in a data security breach. Bryan L. Bleichner serves on the Financial Institution Track Defendant Discovery and ESI Committee

In re: Equifax, Inc., Customer Data Security Breach Litigation, No. 17-md-2800-TWT (N.D. Ga.). A settled class action on behalf of a putative class of financial institutions against Equifax alleging negligence and other claims in a data security

breach. Bryan L. Bleichner was court appointed to the Financial Institution Plaintiffs' Steering Committee.

Midwest Am. Fed. Credit Union v. Arby's Rest. Grp. Inc., No. 17-cv-00514-AT (N.D. Ga.). A settled class action on behalf of a putative class of financial institutions against Arby's alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed to the Interim Plaintiffs' Executive Committee.

Bellwether Community Credit Union v. Chipotle Mexican Grill, Inc., No. 17-cv-1102 (D. Colo.). A settled class action on behalf of a putative class of financial institutions against Chipotle alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed to Chair of the Executive Committee.

First Choice Fed. Credit Union et al. v. The Wendy's Company et al., No. 2:16-cv-00506 (W.D. Pa.). A resolved class action on behalf of a putative class of financial institutions against Wendy's alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed to the Executive Committee.

In re: The Home Depot, Inc., Customer Data Security Breach Litigation, No. 1:14-md-02583 (TWT) (N.D. Ga.). This is a resolved putative class action against The Home Depot alleging negligence and other claims in a data security breach affecting 56 million consumers and tens of thousands of financial institutions. Bryan L. Bleichner was court appointed to the Financial Institution Plaintiffs' Steering Committee.

In re: Target Corporation Customer Data Security Breach Litigation, No. 0:14-md-02522 (PAM/JJK) (D. Minn. December 26, 2013). This is a settled class action against Target Corporation alleging negligence and violations of the Minnesota Plastic Card Security Act in a data security breach affecting 70 million consumers and tens of thousands of financial institutions. Chestnut Cambronne served as Co-Lead Counsel for the Financial Institution Class and Coordinating Lead Counsel for Plaintiffs.

In re Pawn America Consumer Data Breach Litigation, No. 21-cv-2544-PJS-HB (D. Minn.). A pending class action on behalf of a putative class of consumers against Pawn America and related entities alleging negligence and other claims in a data security breach. Bryan L. Bleichner was court appointed as Interim Co-Lead Counsel.

In re Wasserstrom Holdings, Inc., Data Breach Litigation, Case No. 3:23-cv-2424 (S.D. Ohio). A pending class action against Wasserstrom Holdings, Inc., an Ohio-based restaurant supplier, alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Interim Co-Lead Counsel.

Kobor v. Skidmore College, No. 1:23-cv-01392 (N.D.N.Y.). A pending class action against Skidmore College, alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Interim Co-Lead Counsel.

In re Precision Imagining, No. 16-2023-CA-00931 (Duval County, Florida). A pending class action against Precision Imagining, a Florida-based imagining company, alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Interim Co-Lead Counsel.

Phillips v. Bay Bridge Administrators, LLC, No. 1:23-cv-022 (W.D. Tex.). A pending class action on behalf of a putative class of consumers against an insurance administrator alleging negligence and other claims in a data security breach. Philip J. Krzeski was court appointed as Executive Committee Counsel.

Lutz v. Electromed, Inc., No. 21-cv-2198-SRN-DTS (D. Minn.). A settled class action on behalf of a putative class of consumers against Electromed alleging negligence and other claims in a data security breach. Chestnut Cambronne prosecuted the matter with two additional plaintiffs' law firms.

Walker v. Nautilus, Inc., No. 20-cv-3414-EAS-EPD (S.D. Ohio). A settled consumer protection class action against Nautilus, Inc. alleging Defendant materially misrepresented the horsepower produced by the electric motors in its treadmills. Chestnut Cambronne served as Plaintiffs' counsel.

In re DPP Beef Litig., No. 20-cv-1319-JRT/HB (D. Minn.). A pending class action on behalf of a putative class of direct purchasers against beef product producers alleging claims of price fixing. Chestnut Cambronne serves as Plaintiffs' Counsel.

Alicia Schaeffer v. Life Time Fitness, Inc. et al., No. 27-cv-20-10513 (Minn. 2020). A class action on behalf of a putative class of group fitness instructors against Life Time Fitness, Inc. alleging Defendants refused to compensate Plaintiff and class members for work performed for their employer's benefit. Chestnut Cambronne served as Plaintiffs' counsel.

Teeda Barclay v. Icon Health & Fitness, Inc., et al., No. 19-cv-02970-ECT-DTS (D. Minn.). A pending consumer protection class action against Icon Health & Fitness and NordicTrack alleging Defendants materially misrepresented the horsepower produced by the electric motors in its treadmills. Bryan L. Bleichner currently serves as Plaintiffs' counsel.

In re Resideo Technologies, Inc. Securities Litig., No. 19-cv-02863-WMW-KMM (D. Minn.). A settled shareholder class action against Resideo and its directors and officers for failing to disclose material information about its spin-off from Honeywell. Chestnut Cambronne served as liaison counsel on this matter.

Delamarter v. Supercuts, Inc., No. 19-3158-DSD-TNL (D. Minn.). A settled class action on behalf of a putative class of consumers against Supercuts alleging violations of the Fair and Accurate Credit Transactions Act. Bryan L. Bleichner served as Plaintiff's Counsel.

Kenneth Peterson v. JBS USA Food Company Holdings, et al., No. 19-cv-1129-JRT-HB (D. Minn.). A pending class action on behalf of a putative class of indirect purchasers against beef product producers alleging claims of price fixing. Chestnut Cambronne served as Plaintiffs' Counsel.

In re: FedLoan Student Loan Servicing Litigation, No. 2:18-md-02833-CDJ (E.D. Pa.). A pending class action on behalf of a putative class of student loan borrowers against FedLoan Servicing / Pennsylvania Higher Education Assistance Agency alleging consumer fraud violations and other claims. Bryan L. Bleichner was court appointed to the Executive Committee.

ASEA/AFSCME Local 52 Health Benefits Trust v. St. Jude Medical, LLC, et al., No. 18-cv-02124-DSD-HB (D. Minn.). A class action on behalf of a putative class of third party health benefits payors against St. Jude Medical and Abbott Laboratories alleging product liability and other claims. Chestnut Cambronne served as Plaintiffs' Counsel.

In Re Pork Antitrust Litigation, No. 18-cv-1776-JRT-HB (D. Minn,). A pending class action on behalf of a putative class of direct purchasers against pork product producers alleging claims of price fixing. Chestnut Cambronne currently serves as Plaintiffs' Counsel.

James Bruner, et al. v. Polaris Industries Inc. et al., No. 18-cv-00939-WMW-DTS (D. Minn.). A class action on behalf of a putative class of consumers against Polaris

Industries alleging product liability claims. Chestnut Cambronne was court appointed as Plaintiffs' Liaison Counsel.

Marie Travis v. Navient Corp. et al., No. 17-cv-04885-JFB-GRB (E.D.N.Y.). A class action on behalf of a putative class of student loan borrowers against Navient Corp. alleging consumer fraud act violations and other claims. Bryan L. Bleichner served as Plaintiffs' Counsel.

Gordon v. Amadeus IT Group, S.A., No. 1:15-cv-05457 (S.D.N.Y. July 14, 2015). A resolved putative class action alleging collusion and anticompetitive behavior among the companies that provide the systems used by travel agents to link to airline flight and fare information known as global distribution systems (GDS). Chestnut Cambronne served as Plaintiffs' Counsel in this litigation.

In re: Anthem, Inc. Data Breach Litigation, No. 5:15-md-02617 (LHK) (N.D. Cal. March 13, 2015). A settled class action against Anthem alleging negligence and other claims in a data security breach affecting in excess of 80 million consumers. Chestnut Cambronne served as Plaintiffs' Counsel in the litigation.

Gassoway v. Benchmark Energy Transport Services, Inc., (S.D. Tex. February 23, 2015). A certified and settled class action case alleging Benchmark Energy Transport Services deducted and withheld an undisclosed surcharge from trucking owner-operators in violation of Federal Regulations. Chestnut Cambronne served as co-lead counsel for the certified class.

Christian v. National Hockey League, No. 0:14-md-02551 (SRN/JSM) (D. Minn. April 15, 2014). Chestnut Cambronne was court appointed to the Plaintiffs' Executive Committee.

Puerta v. Tile Shop Holdings, Inc., No. 0:14-cv-00786 (ADM/TNL) (D. Minn. March 21, 2014). A settled shareholder class action against Tile Shop Holdings and its directors and officers for failing to disclose material information about a supplier relationship. Chestnut Cambronne served as liaison counsel on this matter.

In re: Domestic Drywall Antitrust Litig., No. 2:13-md-2437; 939 F. Supp. 2d 1371 (E.D. Pa. 2013). A settled antitrust putative class action against domestic manufacturers of drywall alleging price-fixing. Chestnut Cambronne served as Plaintiffs' Counsel in this matter.

Lucas v. SCANA Energy Marketing, Inc., No. 1:12-cv-02356 (SCJ) (N.D. Ga. Feb. 8, 2013. A settled consumer protection class action in which Chestnut Cambronne served as co-lead counsel.

In re: Imprelis Herbicide Mktg., Sales Practices and Products Liability Litig., No. 2:11-md-02284 (GP) (E.D. Pa. Oct. 20, 2011). This is a settled products liability class action against the manufacturer of Imprelis Herbicide, DuPont. The class recovered over $378 million to date. Chestnut Cambronne served as Plaintiffs' Counsel.

Minneapolis Firefighters' Relief Ass'n v. Medtronic, Inc, No. 08-6324 (PAM/AJB) (D. Minn. 2009); 618 F. Supp. 1016 (D. Minn. 2009); 278 F.R.D. 454 (D. Minn. 2011). This is a settled securities fraud class action in which Chestnut Cambronne was lead and liaison counsel. The class recovered $80 million.

In re: American Express Anti-Steering Rules Antitrust Litig. (No. II), MDL No. 2221, 764 F. Supp. 2d 1343 (E.D.N.Y. 2010). This is a settled class action alleging that Defendant American Express' policies prohibiting merchants from offering customers incentives to use a particular card or type of payment violated antitrust laws. The case is currently under appellate review before the United States Court of Appeals for the Second Circuit.

Mooney v. Allianz Life Ins. Co. of North America, No. 06-545 (ADM/FLN); 2010 WL 419962 (D. Minn. Jan. 29, 2010). This was a certified class action in which Chestnut Cambronne was co-lead counsel seeking damages of $2 billion. After a three-week trial, the jury concluded Allianz made false and misleading statements intentionally in violation of the statue, but did not award damages.

In re United Healthcare, Inc. Shareholder Derivative Litig., 631 F.3d 913 (8th Cir. 2011), *affirming* 631 F. Supp. 2d 1151 (D. Minn. 2009). This is a settled shareholder derivative case involving the backdating of stock options. Chestnut Cambronne served as lead counsel and recovered on behalf of the company a settlement valued at $922 million. Today, it remains the largest recovery in a shareholder derivative case in United States history.

San Francisco Health Plan v. McKesson Corp., No. 1:08-cv-10843 (D. Mass. May 20, 2008). A settled RICO and Clayton Act class action challenging the pricing of pharmaceutical drugs. The class recovered $82 million. Chestnut Cambronne represented Plaintiff Anoka County.

In re MoneyGram Int'l, Inc. Securities Litig., No. 08-cv-883 (DSD/JJG) (D. Minn. July 22, 2008); 626 F. Supp. 2d 947 (D. Minn. 2009). This is a settled securities fraud class action in which Chestnut Cambronne was co-lead counsel and recovered $80 million for the class.

Avritt v. Reliastar Life Ins. Co., No. 0:07-cv-01817 (JNE/JJG) (D. Minn. April 9, 2007). This is a settled class action that alleged Defendant defrauded consumers in the sale of its Fixed Annuities. Chestnut Cambronne served as local counsel and recovered $31 million for the class.

In re: Air Cargo Shipping Services Antitrust Litig., No. 1:06-md-01775 (JG/VVP) (E.D.N.Y. June 27, 2006). This is a settled class action alleging a price-fixing conspiracy by dozens of international air cargo carriers. Over $500 million was recovered for the class.

In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litig., MDL No. 1720, 398 F. Supp. 2d 1356 (E.D.N.Y. 2005). A settled class action alleging that the rules Defendants Visa and MasterCard impose upon merchants violate antitrust laws.

In re Xcel Energy, Inc. Sec, Derivative & "ERISA" Litig, 364 F. Supp. 980, 995-996 (D. Minn. 2005); *In re Xcel Energy Securities, Derivative & "ERISA" Litigation*, 286 F. Supp. 2d 1047 (D. Minn. 2003). This was a securities fraud class action in which Chestnut Cambronne was co-lead counsel. The class recovered $80 million.
Cooper v. Miller, Johnson, Steichen & Kinnard, No. 0:02-cv-01236 (RHK/AJB) (D. Minn. June 5, 2002) This is a settled securities fraud class action in which Chestnut Cambronne served as lead counsel. The class recovered $5.6 million.

In Re E.W. Blanch Holdings, Inc. Securities Litig., No. 0:01-cv-00258 (JNE/JGL) (D. Minn. Feb. 12, 2001) This is a settled securities fraud class action in which Chestnut Cambronne served as lead counsel. The class recovered $20 million.

In re Blue Cross Subscriber Litig., No. 19-C3-98-7780 (Minn. Dist. Ct. 1st Dist.) This was a consumer protection class action on behalf of Blue Cross subscribers. Over $41 million was recovered for Blue Cross policy holders. Chestnut Cambronne served as lead counsel.

Alford v. Mego Mortgage Home Loan Owner Trust 1997-1; Mazur v. Empire Funding Home Loan Owner Trust 1997-1; and *Banks, et al. v. FirstPlus Home Loan Trust 1996-*

2 (Minn. Dist. Ct. 4th Dist.). These are settled consumer-lending cases in which Chestnut Cambronne acted as co-lead counsel.

Chestnut Cambronne also has experience successfully defending class litigation. *See, e.g., In re K-Tel,* 300 F.3d 881 (8th Cir. 2002); *Wylde v. Champps of New Brighton,* No. 10-cv-4953 (ADM/JJK) (D. Minn. 2011); *Johnson v. BP America, Inc.* No. 12-cv-00417 (RHK/JSM) (D. Minn. 2012). Not only do the results obtained in the above cases attest to the skill and competence of Chestnut Cambronne lawyers in shareholder litigation, various courts have publicly commended Chestnut Cambronne for its efforts:

> Plaintiffs' co-lead counsel have significant experience in representing shareholders and shareholder classes in federal securities actions around the country and in this district in particular. Counsel-both the lawyers representing lead plaintiffs and defendants-conducted themselves in an exemplary manner. … Thus, the effort of counsel in efficiently bringing this case to fair, reasonable and adequate resolution is the best indicator of the experience and ability of the attorneys involved, and this factor supports the court's award of 25%.

In re Xcel Energy, Inc. Sec, Derivative & "ERISA" Litig, 364 F. Supp. 980, 995 (D. Minn. 2005).