

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST
LITIGATION (NO. II)**

Case No. 3:23-md-3071

MDL No. 3071

JURY DEMAND

Judge Waverly D. Crenshaw, Jr.

**This Document Relates to:
ALL CASES**

**DECLARATION OF STACEY SLAUGHTER
IN SUPPORT OF PLAINTIFFS' MOTION
FOR INTERIM ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION
EXPENSES, FUTURE LITIGATION EXPENSE FUND, AND SERVICE AWARDS
FOR NAMED PLAINTIFFS
FILED ON BEHALF OF ROBINS KAPLAN LLP**

I, Stacey Slaughter, pursuant to 28 U.S.C. § 1746, declare that the following is true and correct to the best of my knowledge and belief.

1. I am a partner with Robins Kaplan LLP (“Robins Kaplan” or “RK”) and Co-Chair of the firm’s Antitrust and Trade Regulation Group (“Antitrust Group”). I submit this declaration in support of Plaintiffs’ Motion for Interim Attorneys’ Fees, Reimbursement of Litigation Expenses, Future Litigation Expense Fund, and Service Awards for Named Plaintiffs (the “Motion”). I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. The Court appointed me, Patrick Coughlin of Scott+Scott Attorneys at Law, LLP and Swathi Bojedla of Hausfeld LLP as Interim Co-Lead Counsel (“Co-Lead Counsel”), and Tricia Herzfeld of Herzfeld, Suetholz, Gastel, Leniski and Wall, PLLC as Liaison Counsel, to manage

and prosecute this litigation. Dkts. 278, 1068. The Court also appointed a Plaintiffs' Steering Committee ("PSC") to help prosecute this litigation. *Id.*; *see also* Dkts. 703, 705.

3. Collectively, Co-Lead Counsel, Liaison Counsel, and the PSC ("Plaintiffs' Counsel" or "Plaintiffs' Leadership") have vigorously and efficiently prosecuted this novel and highly complex antitrust case against more than 50 Defendants for almost four years.

ABOUT ROBINS KAPLAN LLP AND MY BACKGROUND AND EXPERIENCE

4. An AmLaw 200 law firm with nearly 200 lawyers practicing in offices in Minnesota, New York, California, Massachusetts, North Dakota, and South Dakota, Robins Kaplan is a premier national trial law firm with a robust complex-litigation practice. Over the firm's 88-year history, Robins Kaplan attorneys have served in leadership positions in hundreds of class actions, mass tort actions, and complex litigation cases.

5. Attached as **Exhibit 1** to this declaration is a true and correct copy of the current Robins Kaplan Antitrust Group resumé and selected antitrust attorney biographies, detailing some of the firm's experience in antitrust litigation and trials. This resumé does not list all cases in which attorneys at Robins Kaplan have been class counsel or otherwise have served as counsel of record or all the firm's attorneys with antitrust experience.

6. Robins Kaplan's Antitrust Group is recognized as one of the nation's leading plaintiffs' antitrust litigation practices. The firm has been ranked by *Chambers USA* for Antitrust: Plaintiff Nationwide since 2014 and has also been recognized for its plaintiff-side antitrust practices in New York and Minnesota. *Benchmark Litigation* has ranked Robins Kaplan as a Tier 1 firm for Competition/Antitrust Nationwide from 2021 through 2025, while *Global Competition Review's* "GCR 100" has recognized the firm as one of only four "Global Elite U.S. Plaintiffs' Firms" from 2022 through 2026. Robins Kaplan has also been recognized by *Law360* as a "Competition Practice Group of the Year," one of the nation's "Most Feared Plaintiffs' Firms,"

and a “Litigation Powerhouse”; by *The Legal 500* as one of the nation’s leading firms for plaintiff-side antitrust class actions; by *U.S. News – Best Lawyers* as a Tier 1 firm for Antitrust Litigation in Minneapolis; and by the *National Law Journal*, which selected Robins Kaplan as the inaugural recipient of its Elite Trial Lawyers Award for Plaintiff’s Firm of the Year in 2023. In addition, the firm’s antitrust lawyers have been repeatedly recognized by *Lawdragon* as among the nation’s leading antitrust litigators and plaintiff-side financial lawyers. The Huntington/UC Law San Francisco *Antitrust Annual Report* recently recognized Robins Kaplan as one of the nation’s leading plaintiffs’ antitrust firms, ranking the firm among the national leaders in complaints filed, settlements achieved, class recoveries, and cases reaching final settlement approval based on its comprehensive analysis of antitrust class action activity spanning the preceding fifteen years.

7. The firm “has an enviable track record litigating and winning big antitrust cases and securing favorable settlements,” and its antitrust attorneys have been heralded by peers and clients alike as “highly experienced,” “top-end lawyers,” “whip smart,” “forward-thinking,” “creative,” and “simply amazing.” *See generally* **Exhibit 1**.

8. Many of the firm’s results have been historic. In the field of antitrust, Robins Kaplan has secured recoveries totaling more than \$15 billion in cases, acting as lead or co-lead counsel. Highlights include *State of Minnesota and Blue Cross & Blue Shield of Minnesota v. Philip Morris Inc.*, No. C1-94-8565 (Minn. Dist. Ct.), in which the firm secured a landmark \$6.8 billion settlement on behalf of the State of Minnesota and Blue Cross and Blue Shield of Minnesota following a fifteen-week trial; *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.*, MDL No. 1720 (E.D.N.Y.), in which the firm secured a \$5.6 billion settlement on behalf of merchants that accepted Visa/Mastercard (the largest known settlement in a private action under the Sherman Act); *In re Air Cargo Shipping Servs. Antitrust Litig.*, MDL No. 1775 (E.D.N.Y.), in

which the firm secured over \$1.2 billion in total settlements from nearly three dozen global airlines accused of a decade-long conspiracy to fix airfreight prices; *In re Auto. Parts Antitrust Litig.*, MDL No. 2311 (E.D. Mich.), in which the firm secured over \$1.2 billion on behalf of end-payor purchasers of vehicles (the largest known indirect purchaser antitrust recovery in U.S. history); *Dahl, et al. v. Bain Capital Partners, LLC, et al.*, No. 07-cv-12388 (D. Mass.), in which the firm secured a \$590.5 million settlement on behalf of public shareholders; and *In re Disposable Contact Lens Antitrust Litig.*, MDL No. 2626 (M.D. Fla.), in which the firm secured \$118 million in settlements on behalf of consumers of disposable contact lenses.

9. Robins Kaplan attorneys have also demonstrated a proven ability to litigate complex antitrust cases through trial and obtain exceptional results. In *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (N.D. Cal.), Robins Kaplan secured more than \$400 million in settlements from multiple defendants and, after trying the case against the sole remaining defendant, obtained a unanimous jury verdict on behalf of its client, Best Buy, resulting in a \$22.5 million judgment. Likewise, Robins Kaplan obtained a multimillion-dollar judgment on behalf of its client, Blue Cross Blue Shield of Minnesota, following trial in *In re Lorazepam & Clorazepate Antitrust Litig.*, 1:99-mc-00276 (D.D.C.). These results reflect the firm's willingness and ability to pursue antitrust cases through trial when necessary to maximize recoveries for its clients.

10. The professionalism and advocacy of Robins Kaplan attorneys have also been recognized by courts presiding over numerous complex antitrust and multidistrict litigations. In many instances, these commendations were directed to plaintiffs' leadership or class counsel, of which Robins Kaplan attorneys were integral members. Collectively, those courts praised counsel for their professionalism, civility, advocacy, diligence, and ability to effectively manage complex litigation, including observations that counsel "embod[y] the spirit of Rule 1," are "amongst the

best attorneys” with whom the court had worked, and demonstrated advocacy reflected in “great papers” and “great oral argument.” **Exhibit 1.**

ROBINS KAPLAN STAFFING IN THIS CASE

11. From this case’s inception, I have served as one of three Court-appointed Interim Co-Lead Counsel, sharing responsibility for the overall leadership and prosecution of this litigation while helping to direct its most significant legal, strategic, and settlement matters. Robins Kaplan devoted substantial attorney resources to this litigation from its inception through the present. During that time, a number of Robins Kaplan attorneys contributed to the firm’s common-benefit efforts. Because the litigation proceeded simultaneously on litigation and mediation tracks, there were periods requiring sustained, coordinated efforts across multiple workstreams, necessitating the involvement of additional attorneys and professional staff to meet the demands of the case. In all, 39 Robins Kaplan timekeepers worked on this matter. I paid considerable attention to ensuring that each Robins Kaplan attorney and professional on the file had specific areas of focus; that there was not duplication of efforts; and that projects were assigned to experienced lawyers and professionals with depth in the field or subject matter who could effectively and efficiently execute the work this case demanded.

12. Because this litigation has been pending for nearly four years, the composition of the Robins Kaplan litigation team has changed over time. The attorneys described below are the current members of the team who assumed key responsibilities in the firm’s common-benefit work. Numerous former Robins Kaplan attorneys also made meaningful contributions to the prosecution of this action before departing the firm, and their work is likewise reflected in the firm’s time and expense submission. The following summaries describe the current Robins Kaplan attorneys who assumed primary responsibilities in carrying out the firm’s common-benefit work on behalf of

Plaintiffs and the principal roles they served in the prosecution of this action. Complete biographies are included in the firm resumé at **Exhibit 1**.

13. **Stacey Slaughter.** I am a partner and Co-Chair of Robins Kaplan's Antitrust Group. Throughout this litigation, I served as one of three Court-appointed Co-Lead Counsel for Plaintiffs. Together with the other Co-Lead Counsel, I shared responsibility for directing the prosecution of the case on behalf of the proposed class, coordinating the work of Plaintiffs' Leadership, and making the principal strategic and tactical decisions that guided the litigation from its inception through the settlements now before the Court.

14. During more than four years of litigation, the case proceeded simultaneously through extensive fact and expert discovery, mediation, and settlement negotiations while claims remained pending against more than 50 defendants until settlements were reached with most, but not all, defendants. As Co-Lead Counsel, my responsibilities required continual involvement in the litigation's most important strategic, legal, and settlement issues. Critical work product and strategic decisions required review, refinement, and coordination among the Court-appointed Co-Lead Counsel before being advanced on behalf of Plaintiffs. Accordingly, I reviewed and provided substantive input on major briefing, discovery strategy, expert work, mediation submissions, settlement materials, and other work product regardless of which Plaintiffs' firm had preliminary drafting responsibility. I attended every mediation and participated in numerous settlement discussions and negotiations. I also worked closely with the other Co-Lead Counsel to ensure that Plaintiffs consistently presented unified legal positions, litigation strategy, and settlement objectives throughout the case.

15. In addition to my responsibilities as Co-Lead Counsel, I directed and supervised Robins Kaplan's common-benefit work throughout this litigation. I assigned responsibilities

among the firm's attorneys and professional staff, reviewed and supervised the firm's work product, coordinated Robins Kaplan's efforts with those of Plaintiffs' Leadership, and ensured that the firm's work was effectively integrated into Plaintiffs' broader common-benefit efforts. These responsibilities required me to remain personally engaged in advancing the litigation and in settlement matters while simultaneously directing Robins Kaplan's common-benefit contributions on behalf of Plaintiffs.

16. I have practiced law for 27 years and am a member in good standing in the state bars of Minnesota and New York. I am also admitted to practice in the United States District Courts for the District of Minnesota, Eastern District of New York, Southern District of New York, District of Colorado, and Eastern District of Michigan; the United States Court of Appeals for First, Second, Eighth, Ninth, and Federal Circuits, as well as currently admitted pro hac vice in several federal courts around the country. I received my J.D., *cum laude*, from the University of Minnesota Law School in 1999, where I served as a Note and Comment Editor of the *Minnesota Law Review*, and thereafter clerked for the Honorable Paul A. Magnuson and the Honorable Michael J. Davis of the United States District Court for the District of Minnesota.

17. Over the past 27 years, my practice has focused primarily on representing plaintiffs in complex antitrust and other class actions. I have served in court-appointed leadership positions, including recently in *In re Granulated Sugar Antitrust Litig.*, MDL No. 3110 (D. Minn.) and *In re Hard Disk Drive Suspension Assemblies Antitrust Litig.*, MDL No. 2918 (N.D. Cal.). During my career, I have helped secure more than \$6 billion in recoveries for plaintiffs harmed by anticompetitive conduct and other unlawful practices and have played significant roles in several of the nation's landmark antitrust class actions, including *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.* and *Dahl, et al. v. Bain Capital Partners, LLC, et al.*. Those

experiences informed my work as Co-Lead Counsel in this litigation and my substantive involvement throughout every stage of the proceedings. *Chambers USA* has ranked me as a leading antitrust lawyer; *Benchmark Litigation* has named me a Litigation Star; *Lawdragon* has included me among the 500 Leading Lawyers in America, the 500 Leading Litigators in America, and the Leading Global Antitrust & Competition Lawyers; and the *National Law Journal* has named me one of its Elite Women of the Plaintiffs' Bar.

18. **Geoffrey H. Kozen.** Mr. Kozen is a partner and Co-Chair of Robins Kaplan's Antitrust Group. Throughout this litigation, Mr. Kozen worked closely with me in implementing the firm's litigation strategy and served as the principal attorney responsible for directing and coordinating Robins Kaplan's day-to-day common-benefit work. In that role, he assumed responsibility for managing the firm's day-to-day litigation efforts, coordinating the firm's major workstreams, supervising and working directly with the attorneys assigned to those workstreams, and ensuring that the firm's work was effectively coordinated with Plaintiffs' broader leadership efforts. Mr. Kozen also played a central role in developing and executing discovery strategy, directing the firm's briefing efforts, coordinating expert work, preparing for depositions, participating in settlement negotiations and related strategic discussions, and addressing the numerous legal and operational issues that arose throughout the course of the litigation. Working closely with me, he helped translate the firm's broader litigation strategy into the day-to-day execution of Robins Kaplan's common-benefit responsibilities. His judgment, leadership, and ability to coordinate the work of a large litigation team were instrumental to Robins Kaplan's contribution to the successful prosecution and partial resolution of this litigation. Mr. Kozen focuses his practice on antitrust, class action, and other complex commercial litigation and has represented clients in numerous high-stakes disputes in trial and appellate courts throughout the

country. Prior to joining Robins Kaplan, he worked for the United States Senate and a national antitrust policy organization. His experience in complex antitrust litigation includes *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.* and *In re Cattle & Beef Antitrust Litig.* He has been recognized by *Benchmark Litigation* as a 40 & Under attorney, by *The Best Lawyers in America: Ones to Watch*, and by *Minnesota Lawyer* as an Up & Coming Attorney. He received his J.D., *cum laude*, from Georgetown University Law Center in 2013, where he served as a Notes Editor of *The Georgetown Law Journal*. Mr. Kozen is licensed to practice in Massachusetts, Minnesota, and New York.

19. **Thomas J. Undlin.** Mr. Undlin is a partner in Robins Kaplan's Antitrust Group. Mr. Undlin served as a senior counselor throughout this litigation, bringing the benefit of nearly four decades of experience litigating and leading some of the nation's largest and most successful antitrust class actions. To fulfill that role, Mr. Undlin remained well informed regarding the progress of the litigation by reviewing significant pleadings, briefs, and other important work product, participating in discussions concerning major developments in the case, and attending selected mediation sessions. Mr. Undlin drew on his extensive experience in complex antitrust class actions to provide insight on strategic and settlement issues that arose during the litigation. His experience served as a valuable resource throughout the litigation. Mr. Undlin previously served as court-appointed co-lead counsel in *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.*, which resulted in the largest private antitrust settlement in the history of the Sherman Act, and as co-lead counsel in *Dahl, et al. v. Bain Capital Partners, LLC, et al.* *Chambers USA* has recognized Mr. Undlin as a leading antitrust lawyer, describing him as "a first-class lawyer and wonderful adviser," and *Benchmark Litigation* has recognized him as a Litigation Star.

He received his J.D., *cum laude*, from William Mitchell College of Law in 1987. He is licensed to practice in Minnesota and New York.

20. **J. Austin Hurt.** Mr. Hurt is a counsel in Robins Kaplan's Antitrust Group. Drawing on his considerable experience with multidistrict litigation, including proceedings before the Judicial Panel on Multidistrict Litigation and the procedural issues unique to MDL practice, Mr. Hurt served as one of the firm's principal attorneys responsible for discovery and case management. He played a leading role in defendant-specific discovery, including preparing for and taking depositions of defendant witnesses and preparing and defending representative class plaintiffs for depositions. Mr. Hurt also supervised cross-firm document review teams comprised of attorneys from Robins Kaplan and other Plaintiffs' firms, coordinating large-scale document review efforts and helping to ensure the efficient identification, analysis, and development of evidence supporting Plaintiffs' claims. As settlements were reached, Mr. Hurt assumed responsibility for preparing the quarterly settlement status reports filed with the Court following the departure of the Robins Kaplan attorney who had previously performed that role, while also assisting with other settlement-related matters. His experience with multidistrict litigation, discovery coordination across multiple Plaintiffs' firms, and management of essential case responsibilities made him an integral member of the Robins Kaplan team throughout the prosecution and resolution of this action. Mr. Hurt has developed broad experience in litigating complex multidistrict and class action cases, including *In re LIBOR-Based Financial Instruments Litig.*, MDL No. 2262 (S.D.N.Y.), *In re Equifax Inc. Customer Data Security Breach Litig.*, MDL No. 2800 (N.D. Ga.), and *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practice, and Prods. Liability*, MDL No. 2777 (N.D. Cal.). He received his J.D. from Hamline University School of Law in 2010. He is licensed to practice in Minnesota and New York.

21. **Eric Barstad.** Mr. Barstad is a counsel in Robins Kaplan's Antitrust Group. Throughout this litigation, Mr. Barstad was entrusted with portions of Plaintiffs' most consequential legal briefing, where he applied his exceptional legal research, analytical, and writing skills to complex issues central to the advancement of Plaintiffs' claims. Early in the litigation, Mr. Barstad researched and drafted portions of Plaintiffs' opposition to Defendants' motions to dismiss and Plaintiffs' opposition to Defendants' motion to stay discovery. As the litigation progressed into the class certification phase, he has assumed responsibility for researching, analyzing, and drafting portions of Plaintiffs' forthcoming class certification briefing, working collaboratively with attorneys from Robins Kaplan and co-lead counsel on the legal and factual issues presented by class certification. His work consistently focused on sophisticated legal analysis and written advocacy involving many of the litigation's most important legal issues. His ability to distill complex legal questions into persuasive written advocacy made him an important contributor to Plaintiffs' common-benefit work. Prior to joining Robins Kaplan, Mr. Barstad practiced antitrust law at an international law firm, where he represented clients in complex antitrust litigation, merger investigations, and government investigations. Mr. Barstad received his J.D. from the University of Chicago Law School in 2010. He is licensed to practice in Minnesota and New York.

22. **Caitlin Keiper.** Ms. Keiper is a senior associate in Robins Kaplan's Antitrust Group. Throughout this litigation, Ms. Keiper assumed responsibility for several recurring common-benefit functions requiring continuous coordination among Plaintiffs' leadership, the Plaintiffs' Steering Committee, and Defendants' counsel. She served as the principal drafter of Plaintiffs' portions of the monthly Joint Status Reports filed with the Court, coordinating information from numerous Plaintiffs' firms, meeting and conferring with Defendants' counsel to

prepare joint submissions, and ensuring that the Court received accurate and comprehensive updates regarding the status of the litigation. Ms. Keiper also coordinated Plaintiffs' discovery efforts by leading the weekly discovery coordination calls among the Plaintiffs' Steering Committee firms, monitoring the status of discovery negotiations across multiple defendant groups, and facilitating communication among Plaintiffs' counsel regarding ongoing discovery issues. In addition, she conducted discovery conferrals and meet-and-confers with Defendants' counsel, participated in discovery negotiations, supervised portions of Plaintiffs' document review efforts, prepared for and took depositions of defendant witnesses, and contributed to briefing throughout the litigation, including drafting portions of Plaintiffs' opposition to Defendants' motions to dismiss, the proposed supplemental order governing deposition limits, and other filings submitted on Plaintiffs' behalf. Her ability to coordinate recurring litigation responsibilities involving numerous counsel and parties while simultaneously handling substantive litigation assignments made her an integral member of the Robins Kaplan team. Before joining Robins Kaplan, Ms. Keiper served as a judicial law clerk to the Honorable Robert J. Lynn, Chief Justice of the New Hampshire Supreme Court (Ret.), and as a Special Assistant United States Attorney in the Criminal Appeals Unit of the United States Attorney's Office for the District of Massachusetts, where she twice received the Excellence in Justice Award. She received her J.D. from New England Law | Boston in 2017. She is licensed to practice in Massachusetts, Minnesota, and New Hampshire.

23. **Navy Thompson.** Mr. Thompson is a senior associate in Robins Kaplan LLP's Business Litigation Group. Mr. Thompson focused on litigation coordination and management responsibilities supporting Plaintiffs' discovery and settlement efforts across multiple defendant groups. He participated in discovery meet-and-confers and negotiations with Defendants' counsel,

and developed and maintained litigation management systems used by Plaintiffs' leadership to coordinate discovery obligations, monitor the status of negotiations and disputes, and facilitate informed decision-making regarding discovery issues. As settlement efforts progressed, Mr. Thompson researched, drafted, and refined template settlement provisions and related settlement documents that served as the foundation for negotiations with multiple defendant groups, promoting consistency while allowing settlement agreements to be tailored to the circumstances of each resolution. He also designed, implemented, and maintained a comprehensive settlement management system used by Co-Lead Counsel to coordinate settlement negotiations, monitor key settlement terms and implementation deadlines, and manage the litigation obligations associated with the phased resolution of claims against multiple defendant groups. Through these efforts, Mr. Thompson developed litigation management systems that enabled Plaintiffs' leadership to efficiently coordinate discovery and settlement activities. Before joining Robins Kaplan, he served as a judicial law clerk to the Honorable Roger L. Wollman of the United States Court of Appeals for the Eighth Circuit. He received his J.D. from Georgetown University Law Center in 2018, where he served as an Executive Editor of the *Georgetown Journal of International Law*. He is licensed to practice in Minnesota and New York.

24. **Sam Black.** Mr. Black is an associate in Robins Kaplan LLP's Antitrust Group. Since joining Robins Kaplan, Mr. Black has contributed to Plaintiffs' common-benefit work by assisting with substantive discovery and deposition-related work. He has supported members of the litigation team in preparing for and taking depositions, conducting legal and factual research, analyzing discovery materials, preparing deposition exhibits and related materials, and addressing discovery issues as they arose. His work has provided meaningful support for Plaintiffs' discovery efforts and the development of the factual record in this litigation. Mr. Black's practice focuses on

complex commercial litigation and business disputes. He received his J.D. from the University of Minnesota Law School in 2025, where he served as Lead Online Editor of the *Minnesota Law Review* and as a research assistant to Professor Kristin Hickman. He is licensed to practice in Minnesota.

25. **Nicole Bernhagen.** Ms. Bernhagen serves as Robins Kaplan's lead litigation paralegal in this matter and supervises the firm's paralegal support staff. Throughout the litigation, she managed the centralized litigation repository used by all Co-Lead Counsel and the Plaintiffs' Steering Committee to coordinate the prosecution of the case, ensuring that pleadings, discovery materials, deposition materials, expert submissions, settlement documents, and other substantive litigation work product generated across Plaintiffs' firms were organized, current, and readily accessible to Plaintiffs' leadership. Because of the size and complexity of this multidistrict litigation, the shared repository became a critical component of Plaintiffs' litigation infrastructure, and Ms. Bernhagen was responsible for its day-to-day management, ensuring the integrity, organization, and accessibility of litigation materials relied upon by Co-Lead Counsel and the Plaintiffs' Steering Committee. She also coordinated the collection, organization, and compilation of common-benefit time and expense submissions from Plaintiffs' firms for Court-required leadership reporting, performing an initial quality-control review to identify missing information and facilitate the preparation of the Court's required filings. These responsibilities required continuous coordination with Plaintiffs' leadership, numerous Plaintiffs' firms, litigation vendors, and support personnel and were integral to the efficient management of the litigation and the fulfillment of the Court's reporting requirements.

26. The team was assisted by a number of staff attorneys, Robins Kaplan employees often with many years of experience in practice, including in antitrust, who specialize in a

particular litigation role. For example, some are document review attorneys or project attorneys. These attorneys assist legal case teams in a variety of high-level matters from legal research and writing, third party subpoenas, discovery, document review, privilege review, deposition preparation, and other special discovery projects.

27. The Robins Kaplan team of lawyers were also supported by the firm's in-house suite of litigation support professionals to efficiently maximize resources and manage litigation costs, including its in-house economist, eDiscovery group, and investigations group.

THE RISK AND COMPLEXITY INVOLVED IN THE LITIGATION

28. Robins Kaplan prosecuted this action without any assurance of payment, litigating this case on a wholly contingent basis in the face of significant risk. Large-scale antitrust cases of this type are, by their very nature, complicated and time-consuming. Any lawyer representing large numbers of affected plaintiffs in such actions inevitably must be prepared to make a tremendous investment of time, energy, and resources—as Robins Kaplan did in this case. Furthermore, this case presented several unusual and unique risks.

29. First, the firm was prosecuting a first-of-its-kind antitrust action alleging that RealPage, along with owners and managers of large-scale, multifamily residential apartment buildings (“Property Defendants”), engaged in a nationwide price-fixing conspiracy to artificially inflate the price of multifamily rental prices using algorithms in RealPage’s revenue management software. *See* Dkt. 530, Second Consolidated Amended Class Action Complaint (“*Compl.*”) ¶ 2.

30. Second, Plaintiffs’ Counsel brought this case nearly two years before any government action, independently originating and developing the factual record and legal theories herein. Thus, Counsel’s efforts did not benefit from any government investigation.

31. Third, the allegations were directed at more than fifty defendants, including different categories of participants in metropolitan housing market.

32. And finally, the case proceeded on a demanding schedule requiring Plaintiffs' Counsel to simultaneously litigate the case while participating in an intensive, parallel mediation process.

33. In short, Robins Kaplan and its fellow Plaintiffs' Counsel could not rely on an established roadmap for prosecuting this case. The novelty, scope, and procedural demands of the case required the firm to develop and refine its theories of liability and injury, build a factual record without the benefit of a government investigation, and continually assess the distinct strengths, weaknesses, and settlement considerations associated with more than fifty defendants. Robins Kaplan undertook that work—and committed the substantial resources it required—despite the possibility that the firm would receive no compensation for its efforts.

**COMMON BENEFIT WORK PERFORMED BY ROBINS KAPLAN LLP
FROM INCEPTION THROUGH MARCH 31, 2026**

34. The Joint Declaration (“J.D.”) filed in support of the Motion broadly outlines the common benefit work undertaken by Plaintiffs' Counsel. *See, e.g.*, J.D. ¶¶ 7-46. At all times, the work undertaken by Plaintiffs' Counsel was directed and managed by Co-Lead Counsel, including work undertaken by me and other Robins Kaplan attorneys. Robins Kaplan has been actively engaged in every aspect of this litigation, not simply overseeing and managing it.

35. From inception, Robins Kaplan investigated, developed, and prosecuted this case.

- **Pre-Complaint Investigation and Preparation of Complaints.** Robins Kaplan, along with Scott + Scott, undertook significant, particularized factual and economic investigations before filing a total of eight complaints in different states. Among other things, the firm researched Defendants' public statements, securities filings, and disclosures; conducted economic analyses of data obtained from public and private rental-price and vacancy databases; consulted with experts in the rental-market field; reviewed scholarly articles and industry reports; and analyzed the relevant markets. The firms also prepared 181 service packages and effectuated service on 41 Defendants across thirteen actions; coordinated the filing of sixteen status reports in thirteen jurisdictions; identified potential mediators; and coordinated with other plaintiffs' firms.

- **MDL Proceedings.** Robins Kaplan prepared submissions to the Judicial Panel on Multidistrict Litigation advocating, in the alternative, for transfer to the Middle District of Tennessee. I presented oral argument at the JPML in support of that position. The firm also coordinated with other plaintiffs' counsel and defense counsel before the JPML issued its ruling. After the cases were transferred to this Court, Robins Kaplan coordinated with all counsel to submit proposed orders and respond to the Court's requests for submissions in advance of the May 31, 2023, status conference.
- **Advancing Early Discovery.** Robins Kaplan took affirmative steps to identify and preserve potentially relevant evidence even before formal discovery began. The firm sent document-hold letters to the Defendants and negotiated with many of them on preservation obligations. The firm initiated FOIA requests to the United States Department of Justice, Federal Trade Commission, and federal Department of Housing and Urban Development, and submitted requests under equivalent state statutes to relevant state and local government entities. The firm corresponded and negotiated with many of those entities, including by working collaboratively with agency employees to identify other state entities possessing potentially relevant information. Robins Kaplan also sent document-preservation letters to third parties likely to have relevant information and subsequently negotiated the scope of the preservation requests with many of those third parties. In addition, the firm helped prepare and circulate drafts of the Protective Order and ESI Protocol.
- **Organizing the Joint Statement on Case Progression and Scheduling.** Upon receiving the JPML's transfer order, Robins Kaplan and Scott + Scott immediately circulated to all parties a proposed Case Management Order addressing many of the items later identified in the Court's Order at Dkt. 3 setting the Initial Status Conference. The firms then took the lead in preparing the initial draft of the Joint Statement on Case Progression and Scheduling requested by the Court's Order and liaised with the parties to prepare a proposed agenda and appearance list for the Status Conference.
- **Coordinating Mediator Selection.** On June 2, 2023, Robins Kaplan and Scott + Scott circulated a proposed list of mediators to the other Plaintiffs' counsel. The firms continued coordinating with Plaintiffs' counsel to identify mediators whom they might propose jointly with Defendants to the Court on July 25, 2023.

36. Following the Court's appointment of Co-Lead Counsel in June 2023, Robins Kaplan continued performing common benefit work on the case pleadings and subsequent phases of the litigation.

- **Consolidated Amended Complaints.** Robins Kaplan devoted substantial resources to developing and drafting two comprehensive Consolidated Amended Class Action Complaints incorporating information obtained through ongoing factual investigation, public records, governmental materials, expert consultation, and early discovery. Robins Kaplan attorneys and litigation support professionals helped draft the class-definition; researched and developed allegations concerning agency liability, Defendants' payment arrangements, trade-association activities, and Defendants' participation in the alleged conspiracy; drafted sections addressing the relevant market and metropolitan statistical areas; integrated allegations derived from industry publications and produced documents; and performed extensive revisions and final editing before filing.
- Robins Kaplan also conducted economic analyses in support of the pleadings. The firm reviewed economic and submarket data, analyzed parallel pricing, consolidated property data, and prepared charts for multiple metropolitan areas included in the Second Amended Consolidated Complaint. Its attorneys and litigation support professionals further researched and drafted market-power allegations, prepared additional complaint language responsive to newly developed evidence, and coordinated on the final review and filing of the pleadings.
- **Motion-to-Dismiss Briefing.** Co-Lead Counsel opposed two rounds of motions to dismiss through extensive legal research, briefing, coordination, and oral-argument preparation. The motions presented overlapping and Defendant-specific challenges involving agency liability, state antitrust law, personal jurisdiction, class-action waivers, standing, group pleading, and requests to stay discovery. Robins Kaplan attorneys assumed significant responsibility for these workstreams by drafting and revising substantial portions of Plaintiffs' opposition briefs; conducting legal research on complex antitrust, agency, procedural, and state-law issues; preparing charts correlating the allegations of the operative complaint with the applicable legal standards; drafting and revising opposition sections addressing agency liability, state-law claims, standing, and class-action waivers; and coordinating revisions to the omnibus briefing.
- Robins Kaplan attorneys also prepared extensively for oral argument by developing argument outlines, coordinating strategy with Co-Lead Counsel, and refining the presentation of Plaintiffs' positions for the December 2023 motion-to-dismiss hearing. I personally prepared to address the state-law personal-jurisdiction issues at the oral argument hearing. This work required counsel to synthesize numerous motions and legal theories into comprehensive and consistent responses to Defendants' arguments.

37. After the Court denied Defendants' motions to dismiss, Robins Kaplan undertook fact and expert discovery for the common benefit of the class.

- **Discovery.** Plaintiffs' Counsel conducted extensive and technically complex discovery involving dozens of Defendants and numerous third parties. Robins Kaplan was instrumental in drafting multiple sets of requests for production and interrogatories. Once discovery was underway, Robins Kaplan took primary responsibility for discovery concerning six Defendants, including three currently ranked among the nation's largest property owners and managers, and coordinated with Co-Lead Counsel in supervising the work of other PSC firms. Robins Kaplan negotiated the temporal and geographic scope of production, document custodians, search terms, technology-assisted-review protocols, government and regulatory productions, and access to RealPage's source code; and participated in repeated written, telephonic, and in-person meet-and-confers. When negotiations did not resolve the parties' disputes, Robins Kaplan pursued relief where necessary, including through successful efforts to compel discovery from Sares Regis.
- Robins Kaplan performed substantial work developing the protocols governing this discovery. Robins Kaplan took the primary lead in drafting the ESI Protocol, developing detailed provisions governing metadata, deduplication, inaccessible data, production formats, privilege logging, search methodologies, and technology-assisted reviews, and in drafting and negotiating the Deposition Protocol. Its attorneys also contributed to the negotiated Protective Order. Robins Kaplan assisted with Co-Lead Counsel's efforts to vet and select qualified document-hosting and e-discovery vendors and helped evaluate and select court-reporting and transcription vendors.
- Robins Kaplan also maintained the shared drive to house the critical litigation documents that Plaintiffs' Leadership could access; maintained discovery workstreams and third-party-subpoena trackers to memorialize the parties' discovery positions; and developed a comprehensive settlement tracking system. One of the firm's litigation support professionals assisted with Plaintiffs' source-code-review. The firm identified and pursued deficiencies involving profit-and-loss information, occupancy and rental-unit characteristics, tenant and payment data, government testimony, and other missing production materials. Robins Kaplan attorneys also reviewed more than 50,000 privilege-log entries, formulated and pursued challenges to thousands of privilege assertions, drafted deficiency correspondence, coordinated document-review teams, and supervised review protocols, coding decisions, and privilege and clawback procedures.
- **Depositions.** Attorneys from Robins Kaplan conducted extensive witness-specific document review, prepared deposition outlines and exhibit sets, conducted and second-chaired numerous fact and Rule 30(b)(6) depositions, and prepared and defended Named Plaintiffs throughout the deposition process. Robins Kaplan utilized the testimony to identify admissions and elements of proof for the case, refine expert analyses, pursue

additional discovery, and address production gaps revealed during witness examinations.

- **Experts.** Plaintiffs' Counsel helped to coordinate the expert and consultant work necessary to analyze the extraordinarily large and complex datasets produced in this litigation. Attorneys from Robins Kaplan assisted in selecting and managing outside experts, drafting and negotiating the Expert Discovery Stipulation, and working extensively to evaluate the completeness of Defendants' structured-data productions. This work required sustained coordination among counsel, experts, consultants, vendors, and Defendants.

38. While simultaneously prosecuting this litigation, Robins Kaplan, together with Co-Lead Counsel, pursued extensive mediation and settlement efforts on behalf of Plaintiffs.

- **Mediation and Settlement.** Robins Kaplan attorneys and professionals worked closely with Co-Lead Counsel, the mediator, and Plaintiffs' experts to develop settlement strategy, evaluate potential resolutions, prepare mediation submissions and presentations, and participate in mediation sessions and continuing bilateral negotiations.
- Robins Kaplan contributed to the economic analysis supporting Plaintiffs' mediation positions. That work included analyzing relevant rental, pricing, property, and Defendant-specific data; evaluating potential class-wide impact and damages; assessing the relative exposure and settlement value associated with individual Defendants; and preparing quantitative analyses used to support Plaintiffs' settlement demands and evaluate settlement proposals. Robins Kaplan attorneys also reviewed and negotiated settlement terms, analyzed the legal and economic considerations associated with proposed resolutions, and assisted in documenting the settlements.

39. Robins Kaplan also played an integral role in implementing the settlements, including the selection of the settlement administrator.

- **Claims Administration.** Co-Lead Counsel also performed substantial work selecting, directing, and overseeing the settlement administrator responsible for implementing the settlements. Robins Kaplan attorneys and professionals drafted a comprehensive request for proposals for settlement-administration services, distributed the request to qualified candidates, evaluated the resulting submissions, and interviewed numerous settlement-administration companies regarding proposed notice programs, claims processes, technological capabilities, staffing, security measures, experience, and projected costs.

- Following that process, Co-Lead Counsel selected Angeion Group, LLC to serve as Settlement Administrator. Robins Kaplan thereafter worked closely with Co-Lead Counsel to develop and implement the settlement-administration process; instruct and oversee the administrator's work; coordinate the receipt and use of class-member contact and transactional data; assist in developing the settlement website and notice materials; and monitor the administrator's performance and compliance with the Court-approved notice plan.

40. Additionally, Robins Kaplan took primary responsibility for drafting the Court-ordered monthly Joint Status Reports (JSRs) on Plaintiffs' behalf, the quarterly settlement reports, and the supporting materials for the required annual leadership report.

**ROBINS KAPLAN LLP TIME, RATE & LODESTAR DETAIL
FROM INCEPTION THROUGH MARCH 31, 2026**

41. Robins Kaplan timekeepers were provided with the Court's Order on Protocol for Common Benefit Work and Expenses (Dkt. 302) and instructed to adhere to the requirements of that protocol. Time was recorded by task, indicating with specificity the hours (in tenth-of-an-hour increments) along with a description of the particular activity for the common benefit work that was conducted. The monthly time and expense report was prepared in accordance with the Court's protocol, prepared by the 15th of each month, and then preliminarily audited by Nicole Bernhagen, Robins Kaplan's lead paralegal on this case. Time associated with the monthly audit and this Motion is not included in the hours figures or in Robins Kaplan's lodestar.

42. To ensure that the Robins Kaplan time submission is accurate, I personally reviewed the firm's detailed billing reports for the entire duration of this case. I reviewed the time entry report line-by-line to ensure that the amount of time spent on the work was reasonable; that the rates billed for the work were reasonable given both the nature of the work being done and the seniority level of the attorney or litigation support professional doing the work; that the amount of detail provided in support of the time entry was sufficient; and that the work being done was in furtherance of the Class's interests. With the help of our internal accounting staff, the audit

included removing incorrectly designated time, revising block billed entries, and eliminating otherwise non-compensable entries, consistent with Protocol for Common Benefit Work and Expenses (Dkt. 302) (“Protocol”). *See also* J.D. ¶ 55-60. As part of the audit, my firm has also removed hours associated with pure travel time, Robins Kaplan’s monthly time and expense reporting, the leadership dispute at the beginning of the case, and hours by any timekeepers totaling under 10 hours. It is my understanding that each Co-Lead firm and Liaison Counsel have undertaken the same audit process in connection with their time, rate and lodestar detail.

43. As set forth in the Joint Declaration, Robins Kaplan LLP spent 36,134.50 hours (post-audit) on common benefit work through March 31, 2026, for a total lodestar of \$27,263,332.00, calculated at current rates. J.D. ¶ 62. I have reviewed the audited entries supporting this figure, and I affirm that they are true and accurate, and that the work they reflect was reasonable and necessary to the prosecution of this case. Robins Kaplan undertook this work on a fully contingent basis and for which it has not been paid, thus bearing the risk of non-payment. The time Robins Kaplan attorneys and litigation support professionals devoted to this case meant time they could not devote to other matters. These hours and the associated lodestar do not include the time that my firm has committed and will continue to commit to the case after March 2026 against Defendants – including RealPage – who have not settled. Robins Kaplan will continue to represent Plaintiffs on a fully contingent basis for which it has no guarantee of remuneration.

44. The attached **Exhibit 2** is a true and correct summary by timekeeper of the hours, billing rates, and lodestar for common benefit work on this matter between November 4, 2022, and March 31, 2026. The lodestar amount is calculated at 2026 rates (or the last applicable rate for former employees), minus any excluded time. Attached as **Exhibit 3** is a chart identifying, by

hours and lodestar, the time expended by task category for common benefit work through March 31, 2026, in connection with the prosecution of this litigation.

45. The hourly rates used by Robins Kaplan are our normal hourly rates charged for complex antitrust litigation. However, per the Court's protocol, we applied a \$350 capped billing rate for time entries in which lawyers performed initial document review and coding. As for antitrust matters taken on contingency (like this one), courts have previously approved Robins Kaplan's prior rates as the reasonable basis for a lodestar cross-check of a fee award. Exemplar antitrust cases include *In re Air Cargo Shipping Servs. Antitrust Litig.*, No. 06-MD-1775 (JG) (VVP), 2012 WL 3138596, at *5 (E.D.N.Y. Aug. 2, 2012), *Dahl, et al. v. Bain Capital Partners, LLC, et al.*, No. 1:07-cv-12388-WGY (D. Mass. Nov. 21, 2014), Dkt. No. 1078 (*Private Equity*), and *In re Auto. Parts Antitrust Litig.*, No. 2:12-CV-00203, 2018 WL 11260510 (E.D. Mich. Nov. 7, 2018). As the Court in *Auto Parts* noted, "Class Counsels' lodestar in this litigation totals \$140,028,027.68, from March 23, 2012 through March 31, 2018, calculated in accordance with Class Counsels' current hourly rates. **These rates are reasonable and justified given Class Counsels' many years of experience in prosecuting complex antitrust class actions.**" *Id.* at *3.

46. Based on publicly-available information, the 2026 hourly rates charged by Robins Kaplan are comparable to rates charged at other firms. According to Brightflag, the blended hourly billing rate in 2025 among lawyers at AmLaw 100 firms was \$1,145. *Hourly Rates in AmLaw 100 Firms (2025 Edition)*, BRIGHTFLAG, <https://brightflag.com/asset/law-firm-rates-report/> (last visited July 27, 2026). According to the 2024 Partner Compensation Survey published by Major, Lindsey & Africa, the average hourly billing rate in 2023 for all AmLaw 200 law firm partners was \$1,114, and for equity partners was \$1,218. <https://info.mlaglobal.com/2024-partner-compensation-survey> (last visited July 27, 2026).

47. The range of Robins Kaplan attorney rates in this case is \$350-\$1,470. The average weighted attorney billing rate for Robins Kaplan is \$770.13 per hour. The average weighted Robins Kaplan billing rate for all timekeepers in this litigation is \$755.44. The Robins Kaplan attorneys admitted to practice who performed common-benefit work averaged more than 16 years in practice, reflecting the leadership responsibilities entrusted to the firm by the Court.

48. Robins Kaplan requires its attorneys and other billable timekeepers to record their time contemporaneously in accordance with the firm's timekeeping policy. Timekeepers are required to enter and release their time on a weekly basis and to complete all monthly time entries by the first business day of the following month. The firm employs multiple procedures to monitor and audit compliance with these requirements, including the regular distribution and review of reports identifying missing or delinquent time entries and follow-up with timekeepers who are not in compliance. In addition, monthly hours reports are reviewed as part of the firm's financial reporting process, and further compliance reviews are conducted before each billing cycle. Robins Kaplan strictly enforces its timekeeping requirements, and failure to comply with the firm's timekeeping policy may be considered in connection with performance evaluations, promotions, compensation, and bonus determinations, and may result in disciplinary action. These policies and procedures help ensure that the firm's time records are contemporaneous, accurate, and reliable.

**ROBINS KAPLAN LLP EXPENSE DETAIL
FROM INCEPTION THROUGH JUNE 30, 2026**

49. I also directed and reviewed the audit of our firm's expense submissions for this Motion and declaration. The purpose of this review was to confirm the accuracy of the entries and the necessity for, and reasonableness of, the expenses committed to the litigation. *See also* J.D. ¶¶ 55-60. It is my understanding that each Co-Lead firm, Liaison Counsel, and the PSC have

undertaken the same audit process in connection with this Motion and made appropriate adjustments.

50. As set forth in the Joint Declaration, Robins Kaplan is seeking reimbursement for a total of \$4,050,366.62 in litigation expenses reasonably incurred in connection with the prosecution of this litigation from November 1, 2022, through June 30, 2026. *See* J.D. ¶¶ 63-68. The most significant portion of the firm's expenses is \$3,850,000 in assessments paid to the litigation fund. The use of these funds (and those contributed by other Co-Lead Counsel, Liaison Counsel, and the PSC) are accounted for in the litigation fund reconciliation in the Joint Declaration. *See* J.D. ¶¶ 63-68.

51. Attached hereto as **Exhibit 4** is a true and correct summary of litigation costs and expenses for which Robins Kaplan requests reimbursement. The expenses reflected in **Exhibit 4** were prepared from expense vouchers, receipts, credit card statements, and bank records, all maintained in the ordinary course of business by Robins Kaplan's accounting department, and therefore represent an accurate record of the expenses incurred. These expenses include (1) filing fees; (2) copying, mailing, and serving documents; (3) computer research; (4) travel; (5) other deposition costs; (6) expert fees; and (7) litigation fund assessment contribution fees. The last category of expenses – litigation fund assessment contribution fees— was the largest. The litigation fund expenses covered common benefit expenses such as expert fees, document vendor hosting costs, and deposition court reporting fees and costs.

52. These expenses were incurred by Robins Kaplan on behalf of Plaintiffs on a contingent basis and have not been reimbursed. Robins Kaplan expects to incur additional expenses in connection with the litigation of this case through expert discovery, class certification, summary judgment, and trial.

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

Executed on this 28th day of July, 2026 in Minneapolis, MN.

/s/Stacey Slaughter

ROBINS KAPLAN LLP

Stacey Slaughter

800 LaSalle Avenue, Suite 2800

Minneapolis, MN 55402

Tel: (612) 349-8500

SSlaughter@RobinsKaplan.com

Exhibit 1

ANTITRUST AND TRADE REGULATION GROUP RESUME



BISMARCK
BOSTON
LOS ANGELES
MINNEAPOLIS
NEW YORK
SILICON VALLEY
SIOUX FALLS

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WHO WE ARE ROBINS KAPLAN

A national firm dedicated to trial work.

**Robins Kaplan is Among the Nation's
Premier Trial Law Firms, With 200
Attorneys Across Seven U.S. Cities.**

With one of the nation's top-ranked antitrust practices, we are one of few national firms to have obtained landmark successes on behalf of both plaintiffs and defendants in major antitrust litigation and at trial, including in several of the most significant antitrust cases ever litigated.

Recently named one of the "most feared law firms in litigation" by BTI, we have secured nearly \$15 billion in recoveries for antitrust plaintiffs in the past several years and securing substantial recoveries for clients through jury verdicts.

Our lawyers secured the first settlement between a state and Big Tobacco using an antitrust theory, and we have forced critical structural reforms in many other industries. Our broad range of experience is reflected in the diverse backgrounds of our legal professionals.

Our persistent trial focus and readiness drives our success in and out of the courtroom.

LANDMARK TRIAL VICTORIES

\$6.8 Billion

Reached a settlement with Big Tobacco after a historic 15-week trial. With the result, Robins Kaplan became “the vanguard firm in the first successful battle with Big Tobacco” for states and health insurers (Law360). Domino-like settlements with 45 states followed.

State of Minnesota and Blue Cross & Blue Shield of Minnesota v. Philip Morris Inc., et al. (D. Minn.)

\$2.7 Billion

Received a favorable arbitration award for a Kraft Foods spinoff in breach of contract action against Starbucks, which had terminated Kraft’s exclusive rights to sell Starbucks coffee in grocery and retail stores.

Kraft Foods Global, Inc. v. Starbucks Corporation (S.D.N.Y.)

\$520 Million

Won a jury verdict against Microsoft for infringing a patent for web browser technology. The Federal Circuit affirmed the award, which increased to \$565 million with pre-judgment interest. The case settled days before a second trial on invalidity.

Eolas Technologies, Inc., et al. v. Microsoft Corp. (N.D. Ill.)

\$320 Million

Won a federal jury verdict, plus prejudgment interest, against the creators of “Who Wants to Be a Millionaire?” in a dispute over the show’s profits.

Celador International, Ltd. v. American Broadcasting Cos., Inc., et al. (C.D. Cal.), aff’d (9th Cir.)

ANTITRUST AND UNFAIR COMPETITION LITIGATION SUCCESS

Robins Kaplan has a well-established history of successfully leading major antitrust actions.

\$5.6 Billion

For a class of 10 million merchants, Robins Kaplan pursued an innovative theory that Visa's and Mastercard's interchange fee structure and rules are anticompetitive. The \$5.6 billion settlement, which was granted final approval, is the largest known settlement of a private antitrust action in the 130-year history of the Sherman Act.

In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation (E.D.N.Y.)

More than \$1.2 Billion

In an unprecedented MDL stemming from the largest criminal antitrust investigation in U.S. history, Robins Kaplan recovered more than \$1.2 billion in settlements for purchasers and lessors of vehicles containing price-fixed auto parts.

The cumulative figure is the largest indirect purchaser recovery in U.S. history.

In re Automotive Parts Antitrust Litigation (E.D. Mich.)

\$1.2 Billion

In a class action against providers of air cargo services, Robins Kaplan collected evidence around the world and compelled deposition testimony through The Hague. The final two of 28 settlements came on the eve of trial.

In re Air Cargo Shipping Services Antitrust Litigation (E.D.N.Y.)

\$600 Million

Robins Kaplan identified private equity firms' alleged conspiracy to suppress acquisition prices for target companies in leveraged buyouts and recovered nearly \$600 million in settlements.

ANTITRUST AND UNFAIR COMPETITION LITIGATION SUCCESS *CONTINUED*

More than \$400 Million

Robins Kaplan secured settlements in excess of \$400 million on behalf of Best Buy in a direct action arising from allegations of a price-fixing conspiracy between the leading makers of cathode ray tubes, which were once integral components of televisions and computer monitors.

In re Cathode Ray Tube Antitrust Litigation (N.D. Cal.)

\$432 Million

Robins Kaplan served as co-lead counsel in litigation against Wells Fargo and National General Insurance Company over allegations that it force-placed duplicative and unnecessary insurance on auto loan customers in violation of federal racketeering and state competition laws. The firm obtained \$432 million in settlements plus substantial relief for consumers who sustained harm to their credit reports.

In re Wells Fargo Collateral Protection Insurance Litigation (C.D. Cal.)

\$118 Million

As court-appointed co-lead counsel, Robins Kaplan reached settlements in excess of \$118 million on behalf of U.S. contact lens purchasers, resolving an expansive antitrust class action against the four dominant manufacturers and the largest nationwide distributor of contact lenses.

In re Disposable Contact Lens Antitrust Litigation (M.D. Fla.)

\$28 Million

As court-appointed interim lead counsel, Robins Kaplan reached a settlement worth up to \$28 million on behalf of a class indirect purchasers alleging that Martin Shkreli and his former companies illegally monopolized the market for Daraprim—a once-affordable, life-saving drug that increased in price by more than 4,000 percent under Shkreli's leadership.

BCBSM, Inc. v. Vyera Pharmaceuticals, LLC et al. (S.D.N.Y.)

ADDITIONAL CLASS ACTION SUCCESS

\$433 Million

Robins Kaplan represented business that directly purchased polyurethane foam for incorporation into consumer products including furniture, mattresses, or carpet underlay in claims involving a decade-long conspiracy to fix, raise, and maintain the price of foam products. As part of the executive committee, the firm obtained \$433 million in settlements.

In re Polyurethane Foam Antitrust Litigation (N.D. Ohio)

\$307.5 Million

Robins Kaplan represented plaintiff consumer class in multidistrict civil RICO and consumer-fraud suit against Fiat Chrysler and Bosch alleging unfair, deceptive, and fraudulent practices in the Defendants' marketing and sale of certain EcoDiesel vehicles that were allegedly outfitted with devices that masked their actual emission levels.

In re Chrysler- Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability Litigation (N.D. Cal.)

\$169 Million

As Class Counsel, Robins Kaplan obtained \$169 million in settlements on behalf of a class of contract chicken farmers who allege that the major chicken processing companies conspired to suppress the growers' pay.

In Re Broiler Chicken Grower Antitrust Litigation (N.D. Ill.)

\$134 Million

As class counsel, Robins Kaplan recovered \$134 million on behalf of a class of 250 injured plaintiffs pursuing claims against major banks, financial institutions and brokerage houses for the loss of U.S. Treasury Bonds which were intended to fund structured settlements to be paid over a twenty-year span.

\$48 Million

In the ongoing litigation on behalf of direct purchasers of advertising from local television stations, Robins Kaplan has obtained settlements amounting to \$48 million.

In re Local TV Advertising Antitrust Litigation (N.D. Ill.)

\$30 Million

Robins Kaplan obtained a \$30 million settlement of a nationwide class action alleging Wells Fargo improperly charged FHA mortgage borrowers interest on loans already paid.

Fowler v. Wells Fargo Bank (N.D. Cal.)

\$19.5 Million

As court-appointed co-lead counsel, Robins Kaplan secured a \$19.5 million class settlement in a price-fixing litigation brought by indirect purchasers of interior molded doors against the industry's two leading manufacturers.

In re Interior Molded Doors Indirect Purchaser Antitrust Litigation (E.D. Va.)

\$16.75 Million

As co-lead counsel, Robins Kaplan, on behalf of a proposed class of plaintiffs who traded light sweet crude oil, heating oil, and gasoline futures contracts at allegedly manipulated prices, obtained a settlement of \$16.75 million.

In re Optiver Commodities Litigation (S.D.N.Y.)

\$6.6 Million

Robins Kaplan represented commodities traders in an action alleging that The Bank of Nova Scotia, also called Scotiabank manipulated the precious metals futures market through a spoofing scheme over an eight-year period ending in 2016.

Sterk, et al. v. The Bank of Nova Scotia, et al. (D.N.J.)

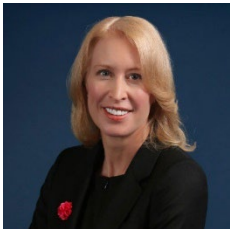
COURT-APPOINTED LEADERSHIP IN ANTITRUST CASES

- *In re Granulated Sugar Antitrust Litigation* (D. Minn.)
- *Jones v. Fanatics, Inc.* (S.D.N.Y.)
- *In re RealPage, Inc. Rental Software Antitrust Litigation (No. II)* (M.D. Tenn.)
- *Segal v. Amadeus IT Group SA, et al.* (N.D. Ill.)
- *In re Cattle and Beef Antitrust Litigation* (D. Minn.)
- *BCBSM, Inc. v. Vyera Pharmaceuticals, LLC, et al.* (S.D.N.Y.)
- *Sterk, et al. v. The Bank of Nova Scotia, et al.* (D.N.J.)
- *In re Hard Disk Drive Suspension Assemblies Antitrust Litigation* (N.D. Cal.)
- *In re Wells Fargo Collateral Protection Insurance Litigation* (C.D. Cal.)
- *In re Disposable Contact Lens Antitrust Litigation* (M.D. Fla.)
- *Washington County Health Care Authority, Inc. d/b/a Washington County Hospital & Nursing Home, et al. v. Baxter International Inc., et al.* (N.D. Ill.)
- *Dahl, et al. v. Bain Capital Partners, LLC, et al.* (D. Mass.)
- *In re Automotive Parts Antitrust Litigation (43 separate actions)* (E.D. Mich.)
- *In re Air Cargo Shipping Services Antitrust Litigation* (E.D.N.Y.)
- *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litigation* (S.D.N.Y.)
- *In re Optiver Commodities Litigation* (S.D.N.Y.)
- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.)
- *In re Polyurethane Foam Antitrust Litigation* (N.D. Ohio)
- *Anastasio, et al. v. Total Gas & Power North America, Inc.* (S.D.N.Y.)
- *County of Monmouth, New Jersey v. Florida Cancer Specialists, et al.* (M.D. Fla.)



ANTITRUST AND TRADE REGULATION GROUP

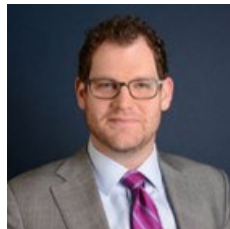
We are a team of attorneys and financial and economic experts pursuing industry-disrupting antitrust litigation. Most of the attorneys in our group have earned individual recognition for excellence in antitrust work.



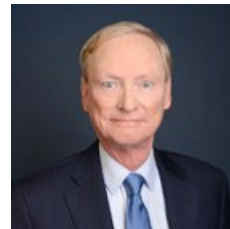
Stacey Slaughter
Partner
Co-Chair, Antitrust and Trade
Regulation Group
Minneapolis, New York
SSlaughter@RobinsKaplan.com



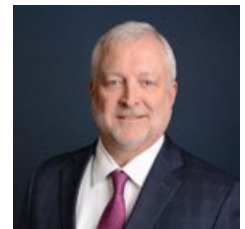
Stephen Safranski
Partner
Co-Chair, Antitrust and Trade
Regulation Group
Minneapolis
SSafranski@RobinsKaplan.com



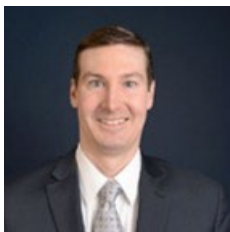
Geoffrey Kozen
Partner
Co-Chair, Antitrust and Trade
Regulation Group
Minneapolis
GKozen@RobinsKaplan.com



K. Craig Wildfang
Partner
Chair Emeritus, Antitrust and Trade
Regulation Group
Minneapolis
KCWildfang@RobinsKaplan.com



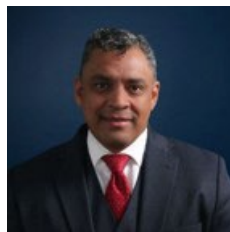
Thomas Undlin
Partner
Minneapolis
TUndlin@RobinsKaplan.com



J. Austin Hurt
Counsel
Minneapolis
AHurt@RobinsKaplan.com



Eric Barstad
Counsel
Minneapolis
EBarstad@RobinsKaplan.com



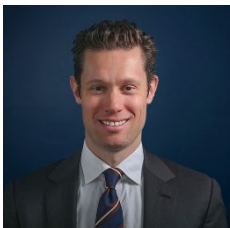
Allen Slaughter
Counsel
Minneapolis
ASlaughter@RobinsKaplan.com



Ellen Jalkut
Counsel
New York
EJalkut@RobinsKaplan.com



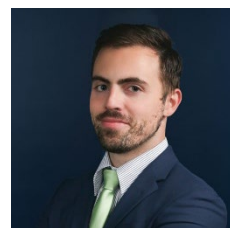
Caitlin Keiper
Associate
Minneapolis
CKeiper@RobinsKaplan.com



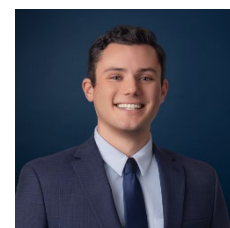
Alexander Rosselli
Associate
Minneapolis
ARosselli@RobinsKaplan.com



Jonathan Edelman
Associate
New York
JEdelman@RobinsKaplan.com



Navy Thompson
Associate
New York
NThompson@RobinsKaplan.com



Samuel Black
Associate
Minneapolis
SBlack@RobinsKaplan.com



Congnan Zhan, Ph.D.
Senior Economic Consultant / Data
Scientist
Minneapolis
CZhan@RobinsKaplan.com

“Class Counsel has without question done a tremendous job in litigating this case. They represent some of the best plaintiff-side antitrust groups in the country, and the size and skill of the defense they litigated against cannot be overstated. They have also demonstrated the utmost professionalism despite the demands of the extreme perseverance that this case has required.... Class Counsel's pedigree and efforts alone speak to the quality of their representation.

Judge Margo Brodie

In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litigation (E.D.N.Y. Dec. 16, 2019)

“You have been just remarkable in your civility toward each other and your – and your dealings not only with me but also with my staff...And so I don't think it would be improper for me to say that when I talk to the other judges or when I am out visiting with people in other districts, I brag on you and let them know how – just what a pleasure and privilege it has been to work with you and watch how you not only zealously represent your own clients but how you work with each other to make this case make sense going forward. It really embodies the spirit of Rule 1.”

Judge Hildy Bowbeer

In re Cattle and Beef Antitrust Litigation (D. Minn. June 17, 2022)

—

“I think you hit the nail on the head when you talked about having good lawyers in the case. I think that's the key to getting cases like this resolved. And I do want to thank all the lawyers for what they've had.”

Judge Harvey E. Schlesinger

In re Disposable Contact Lens Antitrust Litigation (M.D. Fla. Oct. 12, 2022)

—

“Each of you have demonstrated extreme competence, respect for the court, and diligence in your work . . . You are certainly amongst the best attorneys with whom I have had the opportunity to work. Let me thank you for your professionalism in this case.”

Judge Marianne O. Battani

In re Automotive Parts Antitrust Litigation (E.D. Mich. June 4, 2020)

—

“[G]reat papers. Great oral argument.”

Judge Andrew J. Guilford

In re Wells Fargo Collateral Protection Insurance Litigation (C.D. Cal. June 18, 2018)

—

“I think these lawyers, both for the plaintiffs and for the defense, have done a fine job and I am satisfied that the settlement is fair and in the interests of the class, the defendants, and all class members.”

Judge William G. Young

Dahl, et al. v. Bain Capital Partners, LLC et al. (D. Mass. Feb. 18, 2015)

—

“Settlement Class Counsel are highly experienced practitioners in complex litigation generally and antitrust litigation specifically.

In addition, Settlement Counsel has been consistently commended in this case, deservedly so.”

Judge John Gleeson

In re Air Cargo Shipping Services Antitrust Litigation (E.D.N.Y. Sept. 25, 2009)

"Robins Kaplan has a strong team of experienced antitrust lawyers, from senior partners to associates."

Chambers USA, 2026



"The team is organized, offers great communication and is strategic. I have been incredibly impressed with them."

Chambers USA, 2025

"Robins Kaplan is a large antitrust-focused firm. Its depth of resources combined with its expertise in antitrust law make it a powerhouse in the industry."

Chambers USA, 2025

"The group is smart, creative and provides exceptional counsel on many aspects of litigation."

Chambers USA, 2024

"They are highly qualified to handle complex and sophisticated matters, and are among the leading firms in the US in such matters."

Chambers USA, 2022

"The Robins Kaplan National Antitrust Group "has an enviable track record litigating and winning big antitrust cases and securing favorable settlements. Whether it is credit card fees or automobile parts, the results speak for themselves."

Chambers USA, 2021

"They are good at making cost efficiencies and understanding the business aspects."

Chambers USA, 2019

Attorneys were "very responsive" and offered "really good insights into the navigation of the demands and requirements of regulators."

Chambers USA, 2019

"They are simply amazing; they are forward- thinking, creative and very effective. They do a marvelous job."

Chambers USA, 2018



BENCHMARK LITIGATION

Ranked Tier 1 for Competition/Antitrust Nationwide | 2021-2025 Editions
Highly Recommended for Dispute Resolution in Minneapolis | 2020-2025 Editions
Recommended for Dispute Resolution in New York | 2021-2025 Editions



CHAMBERS USA

Ranked for Antitrust: Plaintiff Nationwide | 2014-2026
Ranked for Antitrust: Mainly Plaintiff in New York | 2014-2025
Ranked for Antitrust in Minnesota | 2014-2026



GLOBAL COMPETITION REVIEW

GCR 100: Ranked One of Four Global Elite US Plaintiffs' Firms | 2022-2026 Editions
GCR 100: Ranked in New York | 2021 Edition
"Regional Firm of the Year" Shortlist | 2017-2020
"Litigation of the Year – Cartel Prosecution" Shortlist Automotive Parts, 2021



HUNTINGTON/UC HASTINGS: ANTITRUST ANNUAL REPORT

"Top 50 Cases with Settlements Reaching Final Approval | 2009-2025"
"Top 25 Counsel in Complaints Filed" | 2023-2025
"Top 25 Lead Counsel in Number of Settlements Filed" | 2023-2025
"Top 25 Lead Counsel in Class Recovery" | 2023-2025



LAW360

"Most Feared Plaintiffs Firms" | 2014-2015
"Litigation Powerhouse" | 2016 Inaugural List
"Competition Practice Group of the Year" | 2014-2015



LAWDRAGON 500

"Leading Global Antitrust & Competition Lawyers" | 2026
"Leading Global Antitrust & Competition Lawyers" | 2026
"Leading Plaintiff Financial Lawyers in America" | 2026
"Leading Litigators in America" | 2023-2026



THE LEGAL 500

One of the nation's top firms in the area of Antitrust: Civil Litigation/Class Actions: Plaintiffs | 2015-2022



U.S. NEWS & WORLD REPORT: BEST LAWYERS

Ranked Tier 1 for Antitrust Litigation in Minneapolis
2019-2024 Editions



NATIONAL LAW JOURNAL

Elite Trial Lawyers Award: Plaintiffs Firm of the Year
2023 Inaugural Winner

Acumen Powered by Robins Kaplan LLP™ is our suite of interdisciplinary professional services. With Acumen, we combine over 80 years of trial experience with the expertise of Ph.D. scientists, engineers, financial and economic consultants, as well as dedicated Ediscovery professionals, who together leverage cutting-edge technologies to help clients increase efficiency, reduce costs, and develop specialized solutions to meet their business goals. We define success as helping our clients gain a competitive edge in litigation, as well as in the markets where they operate. These in-house services that enrich our litigation teams include Ediscovery, Science and Engineering Advisors, Financial and Economic Consultants, Investigators, Research and Business Intelligence, Trial and Multimedia Consultants.



Science and Engineering Advisors

Over the last two decades, Robins Kaplan has built an in-house team of scientists and engineers to keep our attorneys and clients at the forefront of technological advancement and the fast-evolving intellectual property landscape. Our team members hold Ph.D. degrees in a range of the scientific and technical disciplines that underpin many of our clients' core technologies. Their keen knowledge of technology provides clients with in-depth insights for both intellectual property evaluation and monetization. Many of our science advisors are also registered as patent agents to practice before the U.S. Patent and Trademark Office.

Financial and Economic Consultants

Robins Kaplan's financial and economic consultants are CPAs and Ph.D.-level economists who are deeply experienced in providing a wide range of quantitative assessments and analyses needed throughout litigation, as well as in complex business decisions. As experts in accounting, financial analysis, economic valuations, and econometrics, these professionals provide our clients with a strategic advantage inside and outside of the courtroom.

Research and Business Intelligence

For decades, Robins Kaplan attorneys have relied on a team of research and business intelligence professionals with graduate degree-level expertise in library and information science to provide cutting-edge data and analytics information. Armed with a full suite of research technology tools and expert resources, these professionals provide our attorneys – and our clients – with the data needed to resolve the thorniest legal and business intelligence questions.

Trial and Multimedia Consultants

Our trial and multimedia consultants bring decades of technology and logistics experience to assist legal teams bound for trial. These in-house experts provide full-service support for trial teams, including management of pretrial logistics, courtroom technology, mock trials, war room setup, multimedia solutions, and trial graphics.

Ediscovery

To help legal departments save costs, eliminate waste, and achieve litigation goals, Robins Kaplan has developed a trusted team of Ediscovery consultants, project managers, and discovery attorneys. The Robins Kaplan Ediscovery team provides solutions for document identification, collection, and review throughout the litigation lifecycle, as well as for other document-intensive projects that our clients manage. Our Ediscovery professionals rely on analytics and state-of-the-art technology to create an efficient and defensible process that allows us to unearth critical evidence faster, decreasing review and production time and reducing the overall cost of Ediscovery.

At Robins Kaplan, we are committed to advancing diversity by ensuring that fairness, respect and professional opportunity for everyone are integral to all of our recruiting, retention and promotion efforts. We believe that the diverse background of our people brings necessary and varied perspectives that enrich our practice of law. Those perspectives make us both a diverse law firm and a smart one. To foster personal and professional growth, we have implemented numerous initiatives to develop, advance, and empower lawyers and aspiring lawyers from all backgrounds.

50%

ATTORNEYS PROMOTED TO PARTNER IN 2023 & 2024 ARE FROM HISTORICALLY UNDERREPRESENTED GROUPS

100%

ATTORNEYS PROMOTED TO PARTNER IN 2025 ARE FROM HISTORICALLY UNDERREPRESENTED GROUPS



PROGRAMS

Quarterly Diversity Events
Disability Justice Seminars
Heritage Month Celebrations



NETWORKING

Attorneys of Color Annual Conference
Pride Month Celebrations
External Community Partnerships



DEVELOPMENT

LCLD Fellows
LCLD Pathfinders
Future Leaders Program
Business Development



RECOGNITIONS



ABA WELL-BEING
PLEDGE MEMBER



WANTON INJUSTICE
LEGAL DETAIL
FOUNDERS CIRCLE



Mansfield Rule
Certified 2023-2024

2024 MANSFIELD
RULE CERTIFIED



LEADERSHIP
COUNCIL
ON LEGAL
DIVERSITY

LEADERSHIP COUNCIL ON
LEGAL DIVERSITY MEMBER



2023 STATE BAR SILVER
DEI LEADERSHIP SEAL



2022 BEST PLACES TO WORK
FOR LGBTQ+ EQUALITY



MINNESOTA WOMEN
LAWYERS 2024
PLATINUM PARTNER



NATIONAL MINORITY SUPPLIER
DEVELOPMENT COUNCIL (NMSDC)
MEMBER

REWRITING THE ODDS

ROBINS  KAPLAN_{LLP}

Stacey Slaughter

PARTNER

CO-CHAIR, ANTITRUST AND TRADE REGULATION
GROUP

Minneapolis | New York

612.349.8500



Overview

Few lawyers have done more to champion the rights of consumers, businesses, and investors who have been harmed by anticompetitive conduct, fraud, and negligence than high-stakes litigator Stacey Slaughter.

Recognized by The Legal 500 as “smart, hard-working, collegial,” Ms. Slaughter is a partner and co-chair of the Antitrust and Trade Regulation Group at Robins Kaplan LLP, with decades-long experience in antitrust and consumer class action litigation, complex commercial litigation, as well as securities and financial markets litigation. The cases Ms. Slaughter has litigated have recovered more than \$6 billion for victims of deceptive or unlawful conduct, and have included some of the largest, high profile, and most innovative cases arising under antitrust and federal securities laws. At home in the courtroom, Ms. Slaughter has litigated numerous cases to trial, arbitration, and resolution, with experience in courts and arbitration forums around the United States.

A Fierce Champion

For over 25 years, Ms. Slaughter has regularly served in court-appointed leadership roles representing clients whose rights have been compromised or who face significant commercial disputes, complex business problems, and novel legal issues. She currently represents consumer purchasers alleging that the largest US sugar producers unlawfully coordinated to inflate prices. Ms. Slaughter is also co-lead counsel to end-user producers alleging that the leading hard disk drive suspension assemblies manufacturers engaged in a nearly 15 year conspiracy to fix prices. She currently represents cattle ranchers and industry trade groups alleging that the country's four largest meatpackers colluded to suppress the prices paid for cattle used in beef production. She represented a class of over 10 million U.S. merchants who allege Visa, Mastercard, and their member banks violated antitrust laws by charging supracompetitive interchange fees on card transactions—a case that has settled for a historic \$5.6 billion.

Among the other noteworthy results she has obtained on behalf of organizations and investors, Ms. Slaughter represented financial institutions in a class action lawsuit against Equifax regarding its unprecedented security failure, one of the largest data breaches in history that impacted an estimated

143 million Americans. She represented investors in an antitrust class action lawsuit against the largest private equity firms for a conspiracy to suppress the buyout price for public companies, which settled for \$590.5 million. Ms. Slaughter represented an institutional investor to recover a confidential settlement amount for toxic, residential mortgage-backed securities. She also represented three institutional investors in a closely-held company to recover \$50 million arising from a failed tax shelter instituted as part of a stock sale. Ms. Slaughter also recovered millions in a FINRA arbitration for a sovereign nation whose financial broker recommended investments in unsuitable, non-traded real estate investment trusts.

A Respected Leader in the Firm and Plaintiffs' Bar

Ms. Slaughter has served on the firm's Executive Board, as Deputy Office Manager in Minneapolis, and as a part of the firm's advancement, hiring, and pro bono committees. She is involved in a number of legal organizations, including the American Association for Justice, the American Bar Association, Twin Cities Diversity in Practice, and is a Fellow of the Litigation Counsel of America, the Trial Lawyer Honorary Society. She is currently Co-chair of the Federal Bar Association's Antitrust Practice Group.

Among her many notable recognitions, Ms. Slaughter was recently ranked one of Lawdragon's 500 Leading Litigators in America (2022-2026) and in the Chambers USA Guide for Antitrust in Minnesota (2022-2026). She was named to the National Law Journal's "Elite Women of the Plaintiffs' Bar" (2020), Twin Cities Business Magazine's "Notable Woman in Law" (2020), Benchmark Litigation's "Litigation Star" (2020-2026), and Super Lawyers "New York Super Lawyer" (2015-2025).

In addition to her professional practice, Ms. Slaughter served on the Law360 Competition Editorial Advisory Board (2022) and runs a pro bono legal clinic for the Jeremiah Program, a nonprofit organization that supports single mothers who are earning a college degree and provides early childhood development opportunities.

Before joining Robins Kaplan, Ms. Slaughter clerked in the United States District Court, District of Minnesota for Judge Michael J. Davis and Chief Justice Judge Paul A. Magnuson. During law school, Ms. Slaughter was a research assistant at the Institute on Race and Poverty.

Credentials

EDUCATION

- University of Minnesota Law School, J.D., *cum laude* (1999); Note and Comment Editor, Minnesota Law Review
- University of Minnesota, Master's Degree (1996)
- Florida State University, B.A., *magna cum laude*, with honors (1994)

ADMISSIONS

Minnesota

New York

U.S. Court of Appeals, Eighth Circuit

U.S. Court of Appeals, Federal Circuit

U.S. Court of Appeals, First Circuit

U.S. Court of Appeals, Ninth Circuit

U.S. Court of Appeals, Second Circuit

U.S. District Court, Central District of California (Pro Hac Vice)

U.S. District Court, Colorado

U.S. District Court, Eastern District of Michigan

U.S. District Court, Eastern District of New York

U.S. District Court, Maryland (Pro Hac Vice)

U.S. District Court, Massachusetts (Pro Hac Vice)

U.S. District Court, Minnesota

U.S. District Court, Northern District of California (Pro Hac Vice)

U.S. District Court, Northern District of Georgia (Pro Hac Vice)

U.S. District Court, Southern District of Illinois

U.S. District Court, Southern District of New York

U.S. District Court, Western District of Texas (Pro Hac Vice)

U.S. District Court, Western District of Wisconsin (Pro Hac Vice)

Selected Results

Serving as court-appointed co-lead counsel, Robins Kaplan reached a \$5.6 billion antitrust class action settlement on behalf of a class of more than 10 million U.S. merchants who accepted Visa and Mastercard credit and debit cards for the purchase of goods and services. Plaintiffs alleged that Visa and Mastercard, as well as major card-issuing banks such as JPMorgan Chase, Bank of America, Citibank, Wells Fargo, and Capital One, violated antitrust laws and charged merchants who accept

credit and debit cards supra-competitive fees on card transactions. The settlement, which was granted final approval in December of 2019 and affirmed on appeal in March of 2023, represents the largest settlement of a private antitrust action in the 130-year history of the Sherman Act. *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y.)

As lead counsel for Tena Companies—an industry leader in mortgage quality control—reached a confidential settlement resolving a commercial contract dispute against Ellie Mae (n/k/a Intercontinental Exchange Mortgage Technologies, “ICE MT”) in the U.S. District Court for the District of Minnesota. Tena alleged that ICE MT violated a contractual non-compete provision relating to federal and state mortgage regulatory reporting software, which the parties had partnered to developed as part of a joint venture. After ICE MT lost its motion to dismiss, the Court ordered the parties to mediate. The parties resolved the case confidentially. *TENA Companies, Inc. v. Ellie Mae, Inc. (n/k/a ICE MT)*, No. 21-cv-1814 (D. Minn.)

Serving on the plaintiffs’ steering committee, represents a class of consumers in a lawsuit against an airbag manufacturer and auto manufacturers involving allegedly defective airbag safety systems. *ZF-TRW Airbag Control Units Products Liability Litig.*, MDL No. 2905 (C.D. Cal.)

Represented direct action plaintiffs alleging manipulation of the LIBOR benchmark in the billion-dollar multi-district litigation in the Southern District of New York against numerous bank defendants surrounding the BBA LIBOR-rigging scandal. *In re LIBOR-Based Financial Instruments Antitrust Litigation*, MDL No. 2262 (S.D.N.Y.)

Represented a class of consumers and reseller car dealers against Fiat Chrysler and Bosch alleging RICO claims for diesel emissions violations, which settled for \$546 million in cash and repairs. *In re: Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability Litigation*, MDL No. 2777 (N.D. Cal.)

Represented three institutional investors in a closely-held company to recover \$50 million in a complex tax shelter and accounting malpractice case, arising from a failed tax shelter instituted as part of a stock sale.

Represented financial institutions in a class action lawsuit against Equifax over its unprecedented security failure, one of the largest data breaches in history that impacted an estimated 143 million Americans. *In re Equifax*, MDL No. 2800 (N.D. Ga.)

Represented investors in a class action suit against the largest private equity firms over alleged conspiracy to suppress prices in large, leveraged buyouts. Defendants Goldman Sachs, Bain Capital, KKR, Blackstone, Silver Lake, Carlyle, and TPG agreed to settle the claims for \$590.5 million. *Kirk Dahl, et al. v. Bain Capital Partners, LLC et al.*, Court Case No. 07-cv-12388 (D. Mass.)

Represented plaintiff Federal Home Loan Bank of Pittsburgh to recover a confidential amount for toxic, residential mortgage-backed securities. *The Federal Home Loan Bank of Pittsburgh v. JP Morgan Chase & Co, et al.*, No. GD-09-016892 (Allegheny Ct., Penn.)

Recovered millions in a FINRA arbitration for a sovereign nation whose financial broker recommended investments in unsuitable, non-traded real estate investment trusts.

Represented investors in claim against broker and broker-dealer for theft and failure to supervise in FINRA arbitration.

Represented company in the financial services industry in a patent infringement suit over a method and system for transferring money.

Achieved Extraordinary \$5.5 Billion Settlement in Interchange Fee and Merchant Discount Litigation March 15, 2023

Reached Settlement for Industry Leader in Mortgage Quality Control Alleging that Joint Developer Violated a Non-Compete Provision September 2022

Obtained Nearly \$600 Million in Settlements in Class Action Against Private Equity Firms September 30, 2014

Representing Indirect Consumer Purchasers Alleging the Largest US Sugar Producers Unlawfully Coordinated to Inflate Prices Matter ongoing

Representing End-User Purchasers Alleging that the Leading Manufacturers of Hard Disk Drive Suspension Assemblies Engaged in a 15 Year Conspiracy to Fix Prices Matter ongoing

Representing Cattle Ranchers in Class Action Alleging That Major Meatpacking Companies Conspired to Suppress Prices for Fed Cattle Matter ongoing

Honors & Recognitions

- *Lawdragon*: Leading Global Antitrust & Competition Lawyers (2025-2026)
- *Lawdragon*: 500 Leading Plaintiff Financial Lawyers in America (2024-2026)
- *Lawdragon*: 500 Leading Litigators in America (2022-2026)
- *Minnesota Lawyer*: Top Women in Law (2025)
- *Benchmark Litigation*: Litigation Star (2020-2026 Editions)
- *Super Lawyers*: New York Super Lawyer (2015-2025)
- *Chambers USA*: Antitrust: Plaintiff, Nationwide (2026)
- *Chambers USA*: Antitrust, Minnesota (2022-2026)
- *Twin Cities Business*: Notable Women in Law (2020)
- *The National Law Journal*: Elite Women of the Plaintiffs' Bar (2020)
- *Minnesota Lawyer*: Attorney of the Year (2014 and 2019)
- *The National Law Journal*: Litigation Trailblazer (2018)

- *Profiles in Diversity Journal*: Women Worth Watching (2017)
- *Law360*: Women in Securities Law (2016)
- *Minneapolis/St. Paul Business Journal*: 40 Under 40 (2009)
- Minnesota State Bar Association: Recognized as a “North Star Lawyer” for providing at least 50 hours of *pro bono* legal services (2015-2022)

Community

CIVIC

- Jeremiah Program Pro Bono Legal Clinic
- Jeremiah Program Board of Trustees (2013-2022)

PROFESSIONAL

- Federal Bar Association; Minnesota Chapter; Co-chair of Antitrust Practice Group (2024-present)
- Federal Bar Association; Minnesota Chapter; Co-chair of Committee on Class Actions, Mass Tort, and MDL's (2021-2024)
- Law360 Competition Editorial Advisory Board (2022)
- American Association for Justice
- American Bar Association
- Minnesota State Bar Association
- New York State Bar Association
- Twin Cities Diversity in Practice; Member Engagement & Innovation, Committee Member (2019-2023)

News & Insights

IN THE NEWS

June 24, 2026 | Case Updates

Robins Kaplan Helps Secure Final Approval of Dodge Ram EcoDiesel Class Action Settlement

August 11, 2025 | Firm News

Robins Kaplan, Scott+Scott, Hausfeld Reach Agreement with Greystar for Significant Monetary Relief and Important Business Reforms

January 2, 2025 | Firm News

Robins Kaplan's Antitrust Class Action Practice Recognized as Leader in the Field for Sixth Consecutive Year

March 16, 2023 | News

Second Circuit Affirms Record \$5.6 Billion Recovery in Antitrust Case

March 7, 2022 | News

Robins Kaplan LLP Announces 2022 Executive Board

January 3, 2022 | News

Stacey Slaughter and Steve Safranski Named Co-Chairs of the Antitrust and Trade Regulation Group

March 8, 2021 | News

Robins Kaplan LLP Announces 2021 Executive Board

October 29, 2020 | News

New York Attorneys Recognized as 2020 “Super Lawyers” and “Rising Stars”

October 13, 2020 | News

Stacey Slaughter Named to *Twin Cities Business*’ Notable Women in Law List

November 21, 2019 | News

Firm, Attorney Stacey Slaughter Recognized by National Law Journal

September 25, 2019 | News

New York Attorneys Recognized as 2019 “Super Lawyers” and “Rising Stars”

May 21, 2019 | News

Settlement Announced in Fiat Chrysler Multidistrict Litigation

February 15, 2018 | News

Robins Kaplan LLP Partner Stacey Slaughter Appointed to Financial Institution Plaintiffs’ Steering Committee in Equifax Multidistrict Litigation

June 20, 2017 | News

Robins Kaplan LLP Partner Stacey Slaughter Appointed to Plaintiffs’ Steering Committee in Fiat Chrysler Multidistrict Litigation

December 2, 2016 | News

Stacey Slaughter Named Executive Director of International Financial Litigation Network

February 23, 2015 | News

Attorneys Of The Year: Craig Wildfang, Tom Undlin and Stacey Slaughter

August 7, 2014 | News

The Blackstone Group and TPG Capital agree to Pay \$325 million in Settlement

June 11, 2014 | News

Goldman Sachs and Bain Capital Agree to \$121 Million Settlements in LBO Antitrust Violations Case

December 13, 2013 | News

Judge Approves \$7.25 Billion Settlement with Visa, MasterCard and Major U.S. Banks for Alleged Anticompetitive Practices and Price Fixing In Setting Interchange Fees

December 20, 2012 | News | *Law360*

Libor Antitrust Risks Remain Despite Early Settlements

SPEECHES

- Class Actions in the USA
2025 Global Class Actions Symposium, London, UK (November 18, 2025)
- How Employers Are Using Market Power to Underpay Workers: The New Antitrust Merger Guidelines' Take on Labor Markets
Moderator, Heller-Hurwicz Economics Institute (May 7, 2024)
- Pre-Trial and Early Case Coordination
Minnesota Chapter Federal Bar Association, Webinar (April 28, 2022)
- Celebrating Native American Heritage Month - Current Issues on American Indian Law and Policy
Hennepin County Bar Association, Webinar (November 29, 2021)
- Current Issues on American Indian Law and Policy
Moderator, In-House CLE for a Financial Institution (October 12, 2021)
- How Affirmative Recovery Can Make Legal a Valued Business Partner
Moderator, Association of Corporate Counsel (ACC) Minnesota In-House Counsel Conference, Webinar (June 17, 2021)
- Practice Pointers for Virtual Hearings
Moderator, Federal Bar Association Minnesota Chapter Class Action and Mass Tort Practice Groups, Webinar (May 17, 2021)
- Avoiding Fiduciary Litigation in the Age of Technological and Digital Transformation
Robins Kaplan LLP Wealth Planning, Administration, and Disputes Annual CLE: The Future of the Fiduciary, Minneapolis, Minnesota (September 12, 2019)
- Legal Lessons Advice to My Younger Self
2019 MWL Conference for Women in the Law, Minneapolis, Minnesota (April 26, 2019)
- Litigation Perspectives from the United States
World Law Congress, Madrid, Spain (February 19, 2019)
- The Equifax Data Breach Litigation Basics
Hennepin County Bar Association, Minneapolis, Minnesota (June 19, 2018)
- Rapid Response: Equifax® Data Breach Webinar
American Association for Justice, Webinar (November 14, 2017)
- Class Action Litigation Developments 2016 2017
Bloomberg BNA, Webinar (November 2, 2017)
- VW Litigation in Europe and the US
International Financial Litigation Network, Madrid, Spain (November 17, 2016)
- Forex Manipulation Litigation in Europe
International Financial Litigation Network and World Federation of Investors, Madrid, Spain (November 17, 2016)
- Developments in the LIBOR Antitrust MDL Case
Robins Kaplan LLP, Webinar (August 23, 2016)

- Fantasy Football A Case Study of Insider Trading as a Cause of Action
Law Seminars International, Seattle, Washington (May 5, 2016)
- A Look Back at Recent Class Action Litigation Developments
Minnesota CLE, Minneapolis, Minnesota (April 5, 2016)
- Class Action Developments Year in Review
Bloomberg BNA, Webinar (January 12, 2016)
- International Approach to Foreign Exchange Litigation
International Financial Litigation Network, London (November 18, 2015)
- Building Credibility Within Your Business Network
Panel, Executive Leadership Forum: By Invitation Only (B.I.O.), Washington, D.C. (October 28, 2015)
- Balancing on the Tightrope of Today's Legal Profession
Law Seminars International: The Eleventh Comprehensive Conference on Class Actions, Seattle, Washington (June 4, 2015)
- Balancing on the Tightrope of Today's Legal Profession
Panel, 2015 International Financial Litigation Congress, Madrid, Spain (May 18, 2015)
- Keeping A Whistleblower Internal
Commercial Law Web Advisor (January 20, 2015)
- Class Action Litigation Developments in 2014
Bloomberg BNA, Webinar (December 2, 2014)
- Taking Down the Take Private Giants: *Kirk Dahl, et al. v. Bain Capital, et al.*
New York State Bar Association Antitrust Executive Committee, New York, NY (November 19, 2014)
- Private Equity "Club Deals": An Antitrust Problem?
Hennepin County Bar Association, Minneapolis, Minnesota (October 21, 2014)
- Recent Supreme Court Decisions on Securities Class Actions; SCOTUS Cases, and the Impact on CII Members
Panel, The Council of Institutional Investors Annual Fall Meeting, Los Angeles, CA (September 29, 2014)
- Navigating Through The Supreme Court Decisions On Class Action
InsideCounsel and Bloomberg Law, Webinar (October 16, 2013)
- Class Action Litigation Developments in 2013
Bloomberg BNA, Webinar (October 2, 2013)
- 2012 Developments in Class Action Litigation
Bloomberg BNA, Webinar (November 29, 2012)
- Coordination in Class Action Cases
WAPA Antitrust Conference, Las Vegas, Nevada (October 11, 2012)

Geoffrey H. Kozen

PARTNER
CO-CHAIR, ANTITRUST AND TRADE REGULATION
GROUP

Minneapolis

GKozen@RobinsKaplan.com
612.349.8500



Overview

Geoffrey Kozen focuses his practice on antitrust, class action, and other complex commercial litigation. He has experience representing clients, ranging from individuals to large corporations, in a wide array of high-stakes disputes and has prosecuted and defended numerous actions in trial and appellate courts throughout the country. And while Mr. Kozen never backs down from litigation, he also recognizes that litigation is a tool to further a client's business objectives, and often the best outcome lies in leveraging litigation into a business resolution.

Mr. Kozen has lectured on antitrust litigation at the University of Minnesota Law School. He is also dedicated to pro bono work, with a particular interest in representing clients in immigration courts and in advocating for those facing domestic violence.

Prior to joining Robins Kaplan, Geoffrey worked for the United States Senate and for a national antitrust policy organization.

Credentials

EDUCATION

- Georgetown University Law Center, J.D., *cum laude* (2013) *The Georgetown Law Journal*, Notes Editor (2011-2013)
- Cornell University, B.A. (2008)

ADMISSIONS

Massachusetts

Minnesota

New York

U.S. Court of Appeals, Eighth Circuit

U.S. Court of Appeals, Ninth Circuit

U.S. Court of Appeals, Second Circuit

U.S. District Court, Central District of Illinois

U.S. District Court, District of Colorado

U.S. District Court, District of Minnesota

U.S. District Court, District of North Dakota

U.S. District Court, Eastern District of New York

U.S. District Court, Northern District of Illinois

U.S. District Court, Southern District of Illinois

U.S. District Court, Southern District of New York

U.S. District Court, Western District of Wisconsin

Selected Results

***In re RealPage, Inc., Rental Software Antitrust Litigation (No. II)*, MDL No. 3071 (M.D. Tenn.):** Robins Kaplan serves as court-appointed co-lead counsel in *In re RealPage, Inc., Rental Software Antitrust Litigation*, in which the firm represents a class of renters against RealPage, major property management firms, and property owners, alleging that the defendants used RealPage's algorithmic pricing tools in a manner that comingled competitively sensitive information and allowed them to suppress competition in the rental housing market, and drive up prices. Plaintiffs have already achieved significant settlements, while litigation is ongoing in the district court against remaining defendants.

***Jones v. Fanatics, Inc., No. 1:25-CV-05776 (S.D.N.Y.)*:** Geoff serves as court-appointed co-lead counsel for the indirect purchaser class in an antitrust class action alleging that Fanatics, MLB, NFL, NBA and their respective players' associations conspired to monopolize and monopolized the market for sports trading cards.

***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL No. 1720 (E. D.N.Y.):** Serving as court-appointed co-lead counsel, Robins Kaplan reached a \$5.6 billion antitrust class action settlement on behalf of a class of more than 10 million U.S. merchants who accepted Visa and Mastercard credit and debit cards for the purchase of goods and services. Plaintiffs alleged that Visa and Mastercard, as well as major card-issuing banks such as JPMorgan Chase, Bank of America,

Citibank, Wells Fargo, and Capital One, violated antitrust laws and charged merchants who accept credit and debit cards supra-competitive fees on card transactions. The settlement, which was granted final approval in December of 2019 and affirmed on appeal in March of 2023, represents the largest settlement of a private antitrust action in the 130-year history of the Sherman Act.

BCBSM, Inc. v. GS Labs, LLC, No. 0:22-CV-00513 (D. Minn.): Robins Kaplan represented Blue Cross Blue Shield Minnesota ("BCBSM") in alleging that GS Labs engaged in widespread fraudulent COVID testing. GS Labs levied 21 counterclaims against BCBSM including allegations of breach of contract, ERISA violations, false advertising, and violation of state and federal antitrust laws. The Court dismissed all antitrust and related counterclaims.

Zuchowski v. SFC Global Supply Chain, Inc., No. 1:20-CV-10171 (S.D.N.Y.): Obtained a Rule 12(b)(6) dismissal of a putative nationwide false advertising class action against global food manufacturer SFC Global Supply Chain Inc. ("Schwan's"). Plaintiffs sought millions in class-wide damages based on alleged false and misleading labeling and marketing of Schwan's Red Baron pizzas with the use of "preservative-free crust" and "no artificial flavors."

Jackson v. SFC Global Supply Chain, Inc., No. 3:20-CV-01072 (S.D. Ill.): Represented global food manufacturer SFC Global Supply Chain, Inc., in a putative false-advertising class action challenging the labeling of Red Baron pizzas. After most of the damages claims were dismissed under Rule 12(b)(6), achieved a confidential settlement and stipulated dismissal.

In re: LIBOR-Based Financial Instruments Antitrust Litigation, MDL No. 2262 (S.D.N.Y.): Robins Kaplan represented an investment management company regarding defendant banks' manipulation of the of the British Bankers' Association London Interbank Offered Rate benchmark, which led to defendants paying our client less on financial instruments tied to that benchmark. We achieved numerous confidential settlements on behalf of our clients.

In re Cattle and Beef Antitrust Litigation, MDL No. 3031 (D. Minn.): Robins Kaplan serves as the court-appointed liaison counsel on behalf of cattle ranchers who sold fed cattle to meatpacking defendants, including Tyson and Cargill, among others. Plaintiffs allege that defendants conspired to suppress the price paid for fed cattle since 2015. The case is ongoing before the trial court.

In re Wholesale Grocery Products Antitrust Litigation, MDL No. 2090 (D. Minn.): Robins Kaplan defended grocery wholesaler Supervalu Inc. in a putative antitrust class action by grocery retailers in 13 states alleging that Supervalu and another wholesaler, C&S Wholesale Grocers, Inc., conspired to allocate territories and customers in the Midwest and New England in violation of the Sherman Act.

This significant multidistrict litigation began in 2008 and involved five separate Eighth Circuit appeals and a petition for certiorari to the U.S. Supreme Court. The case was ultimately resolved to the benefit of all parties.

Anthem v. Insys, No. 2:17-CV-02286 (D. Ariz.): Robins Kaplan represented insurer Anthem in litigation against the pharmaceutical manufacturer Insys alleging that Insys marketed Subsys, a powerful painkiller indicated only for cancer patients, to patients who did not have cancer and then lied to Anthem to get the prescriptions paid.

Achieved Extraordinary \$5.5 Billion Settlement in Interchange Fee and Merchant Discount Litigation
March 15, 2023

Obtained Dismissal with Prejudice of Putative Nationwide False Advertising Class Action for Global Food Manufacturer of Red Baron Pizza
August 2022

Resolved Putative Nationwide False Advertising Class Action on Behalf of Global Food Manufacturer of Red Baron Pizza
September 24, 2021

Defended Supervalu in Extensive Antitrust Class Action Litigation
December 20, 2019

Representing Cattle Ranchers in Class Action Alleging That Major Meatpacking Companies Conspired to Suppress Prices for Fed Cattle
Matter ongoing

Representing Investment Manager in Direct Action Alleging Conspiracy Among World's Largest International Banks to Fix Prices of LIBOR
Matter ongoing

Honors & Recognitions

- Listed in *The Best Lawyers in America: Ones to Watch* (2026 Edition)
- Named to "Top Lawyers List," *Minnesota Monthly* (2025-2026)
- Listed in *Benchmark Litigation's 40 & Under Guide* (2024-2025)
- Named an "Up & Coming Attorney," *Minnesota Lawyer* (2023)
- Minnesota State Bar Association: Named a "North Star Lawyer" for providing at least 50 hours of *pro bono* legal services (2016-2025)
- Named to the Massachusetts Supreme Judicial Court's Pro Bono Honor Roll (2023-2024)
- Twin Cities Diversity in Practice: Minnesota Racial Equity Challenge Certification (2021)

Community

CIVIC

- Amara Legal Center, Co-Founder and Volunteer (2014-2015)
- Hennepin County Bar Foundation, Board Member (2024-Present)
- Lion's Harvest, Board Member (2022-Present)
- Mid-Minnesota Legal Aid, Board Member (2025-Present); Treasurer (2026-Present)

PROFESSIONAL

- American Bar Association
- Committee to Support the Antitrust Laws (COSAL), Vice Chair of the Amicus Committee (2024-Present); Co-Chair of the Antitrust and Climate Subcommittee (2022-2024); Chair of the Young Lawyers Division (2021-2022)
- Minnesota State Bar Association, Antitrust Section, Council
- Minnesota State Bar Association, Business Law Section, HCBA Liaison
- Minnesota State Bar Association, Access to Justice Committee

News & Insights**IN THE NEWS**

January 2, 2025 | Firm News

Robins Kaplan's Antitrust Class Action Practice Recognized as Leader in the Field for Sixth Consecutive Year

October 24, 2024 | Firm News

Mid-Minnesota Legal Aid, Robins Kaplan Bring Class Action Suit Against Mobile Home Park

October 21, 2024 | Firm News

Robins Kaplan Ranks in Top 10% For Pro Bono by *Law360*

March 16, 2023 | News

Second Circuit Affirms Record \$5.6 Billion Recovery in Antitrust Case

December 6, 2022 | News

Robins Kaplan LLP Announces 2023 Partners

June 28, 2017 | News

Robins Kaplan LLP Secures Voluntary Termination in Nationally-Watched Parental Rights Case

SPEECHES

- Les Actions Collectives Liées aux Critères ESG et à l'Écoblanchiment – Tendances Nouvelles
Panelist, Barreau du Québec's Colloque National Sur L'Action Collective (December 3, 2025)
- Antitrust Fundamentals
Panelist, Minnesota State Bar Association CLE (November 14, 2024)
- Climate and Antitrust
Panelist, Committee to Support the Antitrust Laws (June 5, 2024)
- Antitrust Fundamentals
Panelist, Minnesota State Bar Association CLE (September 29, 2022)
- How Affirmative Recovery Can Make Legal a Valued Business Partner
Panelist, Association of Corporate Counsel (ACC) Minnesota In-House Counsel Conference, Webinar (June 17, 2021)

- Watch Your Step: The In-House Lawyer's Field Guide to Antitrust Compliance in the Biden Era
Co-Presenter, Minnesota CLE, Webinar (May 26, 2021)
- Class Action Litigation Developments 2016 2017
Bloomberg BNA, Webinar (November 2, 2017)
- *Developments in the LIBOR Antitrust MDL Case*
Robins Kaplan LLP, Webinar (August 23, 2016)

LEGAL INSIGHTS

July 19, 2022 | Publication | *Eric Magnuson and Geoffrey Kozen - Minnesota Lawyer*
Briefly: What to do with a Reverse and Remand

October 25, 2021 | Publication | *Geoffrey H. Kozen*
Summary of the Trial Decision in *Epic Games, Inc. v. Apple Inc.*

September 28, 2021 | Publication | *Stephen Safranski and Geoffrey Kozen - Minnesota Lawyer*
Briefly: Federal appeals: How much notice is enough?

August 10, 2020 | Publication | *Eric Magnuson - Minnesota Lawyer*
New Rules for Nonprecedential Opinions Minnesota Lawyer

November 19, 2018 | Publication | *Minnesota Lawyer*
How Amicus Briefs Can Be Court's Best Friend

February 18, 2016 | Publication | *Minnesota Lawyer*
Frivolity - In the Eye of the Beholder

May 26, 2015 | Publication | *American Antitrust Institute*
Aftermarkets, Exclusion, and Single-Serve Coffee

ARTICLES

- *Climate and Antitrust*, 37 Geo. Env't L. Rev. (Apr. 2025)

Thomas J. Undlin

PARTNER

Minneapolis

TUndlin@RobinsKaplan.com

612.349.8500



Overview

Thomas Undlin has experience in an array of complex business disputes including antitrust, breach-of-contract, fraud, securities, and intellectual property claims. He has practiced in a wide range of jurisdictions including state and federal courts in Minnesota, Wisconsin, Illinois, New York, Texas, and California, as well as varied sponsoring agencies for both domestic and international arbitration and dispute resolution. As co-lead counsel, Mr. Undlin played a key role in *Kirk Dahl, et al. v. Bain Capital Partners, LLC et al.*, a class action suit against some of the world's largest private equity firms for a conspiracy to suppress the buyout price for public companies, with total settlements of nearly \$600 million. Mr. Undlin is also a co-lead counsel in *In re Payment Card Interchange Fee and Merchant Discount Litigation*, since its inception in 2005. Mr. Undlin and his team secured a \$5.6 billion class settlement in the historic litigation in September 2018. The settlement, which was granted final approval in December 2019 and affirmed on appeal in March 2023, represents the largest settlement of a private antitrust action in the 130-year history of the Sherman Act.

According to *Chambers*, Mr. Undlin “is a first-class lawyer and wonderful adviser.”

Credentials

EDUCATION

- William Mitchell College of Law, J.D., *cum laude* (1987)
- St. Olaf College, B.A., Political Science

ADMISSIONS

Minnesota

U.S. Court of Appeals, Eighth Circuit

U.S. Court of Appeals, Federal Circuit

U.S. Court of Appeals, Second Circuit

U.S. District Court, Minnesota

U.S. Supreme Court

Selected Results

In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL No. 1720 (E.D.N.Y.): Serving as court-appointed co-lead counsel, Robins Kaplan reached a \$5.6 billion antitrust class action settlement on behalf of a class of more than 10 million U.S. merchants who accepted Visa and Mastercard credit and debit cards for the purchase of goods and services. Plaintiffs alleged that Visa and Mastercard, as well as major card-issuing banks such as JPMorgan Chase, Bank of America, Citibank, Wells Fargo, and Capital One, violated antitrust laws and charged merchants who accept credit and debit cards supra-competitive fees on card transactions. The settlement, which was granted final approval in December of 2019 and affirmed on appeal in March of 2023, represents the largest settlement of a private antitrust action in the 130-year history of the Sherman Act.

Kirk Dahl, et al. v. Bain Capital Partners, LLC et al., No. 07-cv-12388 (D. Mass.): Co-lead counsel representing public shareholders of target companies taken private in large leveraged buyouts in a class action suit against the largest private equity firms who allegedly conspired to suppress the acquisition prices for the target companies.

Omnicare, Inc. v. UnitedHealth Group, Inc.: Represented defendants UnitedHealth Group, Inc. and PacifiCare, Inc. in an antitrust lawsuit involving alleged price-fixing and fraud related to prescription drug reimbursement under the federal Medicare Part D program. Plaintiff Omnicare sought damages exceeding \$1 billion and permanent injunctive relief. After summary judgment motion was argued in August 2008, the U.S. District Court granted summary judgment to defendants on all claims in January 2009. Published decision: *Omnicare, Inc. v. UnitedHealth Group, Inc.*, 594 F. Supp. 2d 945 (N.D. Ill. 2009). Summary judgment was subsequently affirmed. *Omnicare, Inc. v. UnitedHealth Group, Inc.*, 629 F.3d 697 (7th Cir. 2011).

Powell Protection Systems, Inc. v. Best Buy Stores, L.P. (Dallas County, Texas): Lead trial counsel in defense of action claiming interference with contract and fraud relating to a home audio/video/security wiring program (2007).

Game Financial Corporation v. Global Cash Access (Minnesota, Hennepin County): Lead plaintiff's counsel in action for interference with contract and prospective business relations (June 2004).

Advanced Communication Design, Inc. v. Premier Retail Networks, Inc. (Case No. 01-1271, 1272, United States Court of Appeals for the Federal Circuit): Defense counsel in action leading to reversal of default judgment and order for preliminary injunction in patent infringement action (September, 2002).

Racal NCS, Inc. v. Alliant Techsystems Inc., The Raytheon Group, Hughes Aircraft Company (Miami, Florida) (AAA International Centre for Dispute Resolution): Defense trial counsel before an international tribunal in a contract dispute relating to an underwater sonar device (December, 2002).

VirtualFund.com v. Melvin Masters (Minnesota, Hennepin County): Lead litigation counsel in shareholder derivative action and related proxy battle (March, 2002).

Carlson Hospitality Group, Inc. v. Diversey Lever, Inc. (Minnesota, Hennepin County): Lead counsel in dispute over vendor supply agreement (October, 2002).

Lockheed Martin Environmental Systems v. Alliant Techsystems Inc. (California, Los Angeles County): Lead trial counsel for defendant in action claiming breach of contract and changed conditions relating to environmental clean-up project at China Lake Naval Weapons Base (August, 1999).

Mission Technologies v. Alliant Techsystems Inc. (Texas, Federal Court): Lead defense counsel in matter claiming theft of trade secrets and breach of contract relating to unmanned aerial vehicle (1999).

Peterson v. Fluegel (Minnesota, Dakota County): Plaintiffs' trial counsel in professional negligence action (January, 1999).

Metropolitan Life Ins. Co. v. Golden Triangle (Minnesota, Federal Court) (121 F.3d 351 (8th Cir. 1997)): Trial counsel in defense of claims for fraud and breach-of-contract relating to commercial property sales to a real estate investment trust.

KPMG-Piper Fund Litigation (Minnesota, Federal Court): Defense counsel in securities and accounting fraud class action (1995).

Achieved Extraordinary \$5.5 Billion Settlement in Interchange Fee and Merchant Discount Litigation
March 15, 2023

Obtained Nearly \$600 Million in Settlements in Class Action Against Private Equity Firms
September 30, 2014

Obtained Full Dismissal for UnitedHealth Group, Inc. and PacifiCare, Inc. in Antitrust Lawsuit
January 16, 2009

Defended Client in Trade Secret and Breach of Contract Dispute Relating to Unmanned Aerial Vehicle
1999

Representing Cattle Ranchers in Class Action Alleging That Major Meatpacking Companies Conspired to Suppress Prices for Fed Cattle
Matter ongoing

Honors & Recognitions

- *The Best Lawyers in America*: Litigation - Intellectual Property (2023-2026 editions)

- *Benchmark Litigation*: Litigation Star (2020-2025 Editions)
- *Chambers USA*: Antitrust, Minnesota (2022-2026)
- *Minnesota Monthly*, Named to "Top Lawyers List," (2024-2026)

Community

PROFESSIONAL

- American Bar Association (Litigation Section)
- Minnesota State Bar Association
- Hennepin County Bar Association

News & Insights

IN THE NEWS

January 2, 2025 | Firm News

Robins Kaplan's Antitrust Class Action Practice Recognized as Leader in the Field for Sixth Consecutive Year

August 15, 2024 | News

Robins Kaplan Attorneys Named to 2025 Best Lawyers in America

March 16, 2023 | News

Second Circuit Affirms Record \$5.6 Billion Recovery in Antitrust Case

August 18, 2022 | News

Robins Kaplan Attorneys Named To 2023 Best Lawyers in America List

April 30, 2018 | News

Robins Kaplan LLP Files Lawsuit Alleging Major Rail Equipment Suppliers Entered into Unlawful No-Poach Agreements

February 23, 2015 | News

Attorneys Of The Year: Craig Wildfang, Tom Undlin and Stacey Slaughter

August 7, 2014 | News

The Blackstone Group and TPG Capital agree to Pay \$325 million in Settlement

June 11, 2014 | News

Goldman Sachs and Bain Capital Agree to \$121 Million Settlements in LBO Antitrust Violations Case

December 13, 2013 | News

Judge Approves \$7.25 Billion Settlement with Visa, MasterCard and Major U.S. Banks for Alleged Anticompetitive Practices and Price Fixing In Setting Interchange Fees

SPEAKING ENGAGEMENTS

May 18, 2016 | Speaking Engagement
The Robins Kaplan Tribal Litigation Update

LEGAL INSIGHTS

October 5, 2011 | Publication | *Law360*
Questioning US Antitrust Liability Of Foreign Defendants

May 9, 1997 | Publication | *Minnesota Trial Lawyers Association Seminar*
Unique Aspects of Attorney Malpractice in Financial Transactions

J. Austin Hurt

COUNSEL

Minneapolis

AHurt@RobinsKaplan.com

612.349.8500



Overview

J. Austin Hurt is counsel in Robins Kaplan's Minneapolis office. Mr. Hurt has more than a decade of experience working with the firm's litigation teams on strategies and techniques to protect assets and recover losses in a wide range of business disputes venued in state and federal courts and arbitration forums. Mr. Hurt specializes in class action lawsuits, as well as arbitration, antitrust, securities litigation and complex FINRA arbitrations. He has worked with clients through all stages of litigation, from pre-suit evaluations, to aggressively pursuing discovery, to helping secure the best outcome in high-profile matters.

Mr. Hurt was part of the plaintiff's steering committee team in the Fiat Eco Diesel Emissions multidistrict litigation. He also worked on the LIBOR Interest Rate Benchmark Litigation case, and the Equifax data breach case.

Credentials

EDUCATION

- Hamline University School of Law, J.D. (2010)
- Hawai'i Pacific University, B.A. (2007)

ADMISSIONS

Minnesota

New York

U.S. District Court, District of Minnesota

U.S. District Court, District of North Dakota

U.S. District Court, Eastern District of Michigan

Selected Results

Representing Cattle Ranchers in Class Action Alleging That Major Meatpacking Companies Conspired to Suppress Prices for Fed Cattle
Matter ongoing

Honors & Recognitions

- Minnesota State Bar Association: Named a “North Star Lawyer” for providing at least 50 hours of *pro bono* legal services (2022)

Community

PROFESSIONAL

- Minnesota State Bar Association

News & Insights

IN THE NEWS

May 21, 2019 | News

Settlement Announced in Fiat Chrysler Multidistrict Litigation

June 24, 2026 | Case Updates

Robins Kaplan Helps Secure Final Approval of Dodge Ram EcoDiesel Class Action Settlement

LEGAL INSIGHTS

June 16, 2020 | Publication | *Stacey Slaughter, Austin Hurt, Vincent Licata*

Collateralized Loan Obligations: Emerging Litigation Risks

Eric Barstad

COUNSEL

Minneapolis

EBarstad@RobinsKaplan.com

612.349.8500



Overview

Eric Barstad is a litigator and counselor whose work encompasses all aspects of the firm's business litigation, antitrust, and appellate practices. Over the course of his career, Eric has represented major technology, healthcare, and sports and entertainment clients in connection with strategic transactions and government investigations, including serving as global coordinating counsel on multi-jurisdictional mergers and acquisitions. A skilled listener, Eric regularly advises Fortune 500 companies on the antitrust implications of potential business initiatives and has counseled and litigated on behalf of clients regarding all forms of unfair competition law, including intellectual property and trade secrets.

Eric's litigation experience encompasses a broad array of industries and claims, including healthcare, contract disputes, insurance claims, financial markets, Administrative Procedure Act litigation, and American Indian Law matters. He regularly litigates high-profile antitrust cases around the country, both prosecuting and defending multidistrict monopolization and cartel cases.

Prior to joining Robins Kaplan, Eric spent six years in the antitrust group of a New York City law firm where his practice included a full range of antitrust counseling, merger control, and litigation.

Credentials

EDUCATION

- University of Chicago Law School, J.D.; Donald E. Egan Scholar (2010)
- University of Michigan, A.B. in Philosophy (2007)

ADMISSIONS

Minnesota

New York

U.S. District Court, District of Minnesota

Selected Results

In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL No. 1720 (E.D.N.Y.): Serving as court-appointed co-lead counsel, Robins Kaplan reached a \$5.6 billion antitrust class action settlement on behalf of a class of more than 10 million U.S. merchants who accepted Visa and Mastercard credit and debit cards for the purchase of goods and services. Plaintiffs alleged that Visa and Mastercard, as well as major card-issuing banks such as JPMorgan Chase, Bank of America, Citibank, Wells Fargo, and Capital One, violated antitrust laws and charged merchants who accept credit and debit cards supra-competitive fees on card transactions. The settlement, which was granted final approval in December of 2019 and affirmed on appeal in March of 2023, represents the largest settlement of a private antitrust action in the 130-year history of the Sherman Act.

In re Farm-Raised Salmon & Salmon Prods. Antitrust Litigation: As lead defense counsel for a Norwegian salmon sales and distribution company, reached global cost-of-defense settlement, resolving a series of putative nationwide class actions alleging a global price-fixing conspiracy among sellers of Norwegian farmed Atlantic salmon.

Reached Global, Cost-of-Defense Settlements for Norwegian Salmon Distributor and Producer in Nationwide Antitrust Class Action
February 2023

Resolved Putative Nationwide False Advertising Class Action on Behalf of Genuine Parts Company
June 2022

Defended Supervalu in Extensive Antitrust Class Action Litigation
December 20, 2019

Representing Cattle Ranchers in Class Action Alleging That Major Meatpacking Companies Conspired to Suppress Prices for Fed Cattle
Matter ongoing

Lead Appellate Counsel to Friends of the Boundary Waters Wilderness in Challenge to U.S. Bureau of Land Management Mineral Lease Reinstatements
Ongoing

Honors & Recognitions

- Member of team awarded “Antitrust Matter of the Year” by *Global Competition Review* (2013)

Community

PROFESSIONAL

- American Bar Association; Antitrust Division, IP Committee

News & Insights

IN THE NEWS

February 14, 2017 | News

Eric Barstad Joins Robins Kaplan LLP's Antitrust and Trade Regulation Group

September 7, 2023 | News

Robins Kaplan Achieves Major Win in Boundary Waters *Pro Bono* Case

January 26, 2022 | News

Robins Kaplan LLP Achieves Victory In Boundary Waters Canoe Area Wilderness *Pro Bono* Matter

SPEECHES

- Antitrust Hot Spots for Business Lawyers and In-House Counsel
Minnesota CLE Seminar, Minneapolis, Minnesota (December 5, 2022)

SPEAKING ENGAGEMENTS

May 24, 2021 | Speaking Engagement

Antitrust: Taking on Monopoly Power from the Gilded Age to the Digital Age

LEGAL INSIGHTS

May 11, 2020 | Publication | *Stephen Safranski, Eric Barstad - Bloomberg Law*
Competitor Collaborations and Covid-19—Antitrust Considerations

Caitlin Keiper

ASSOCIATE

Minneapolis

CKeiper@RobinsKaplan.com

612.349.8500



Overview

Caitlin Keiper is an attorney in the firm's Antitrust and Trade Regulation Group. She focuses her practice on antitrust, class action, and other complex commercial litigation. Prior to joining Robins Kaplan, Caity worked at a Minneapolis law firm handling antitrust and consumer protection class actions and multidistrict litigation. She clerked for the Honorable Chief Justice Robert J. Lynn, gaining invaluable research and writing skills that she now applies to complex, high-stakes litigation.

Caity also worked at the United States Attorney's Office for the District of Massachusetts, in the Criminal Appeals Unit. She served as a Special Assistant U.S. Attorney, successfully litigating appeals before the First Circuit and providing important guidance on appellate strategy. Her work at the U.S. Attorney's Office reflects her dedication to excellence, as demonstrated by her recognition as a two-time recipient of the Excellence in Justice Award for outstanding effort and dedication.

Credentials

EDUCATION

- New England Law | Boston (2014)
- Emerson College, *cum laude* (2007)

ADMISSIONS

Massachusetts

Minnesota

New Hampshire

U.S. Court of Appeals, First Circuit

U.S. District Court, District of Massachusetts

U.S. District Court, District of Minnesota

U.S. District Court, Middle District of Tennessee

U.S. District Court, Southern District of Illinois

Honors & Recognitions

- Named to the Massachusetts Supreme Judicial Court's Pro Bono Honor Roll (2024)
- Named a "North Star Lawyer" by the Minnesota State Bar Association for providing at least 50 hours of *pro bono* legal services (2024)
- Excellence in Justice Award (2015 and 2016)

News & Insights

SPEECHES

- Leadership Opportunities Throughout the Litigation Lifecycle
COSAL 4th Annual Leadership and Diversity Summit, San Francisco, California (October 8, 2025)

Navy Thompson

ASSOCIATE

Minneapolis | New York

NThompson@RobinsKaplan.com

612.349.8747



Overview

Navy Thompson leads a dynamic legal career, representing clients in domestic litigation and international disputes around the world. He has represented clients through each stage of litigation, including in pre-litigation disputes, motions practice, discovery, summary judgment, mediation, and on appeal. Navy now focuses on class action litigation, serving as an aggressive advocate for his clients and protecting the economic rights of the American public. He maintains a vibrant pro bono practice, routinely advising and representing clients regarding issues of environmental law, human rights, and civil rights.

Prior to becoming a litigator, Navy earned a Bachelor of Arts in Political Science from the University of Chicago and spent a year studying at the Paris Institute of Politics (Sciences Po - Paris), thereafter serving as a congressional intern at the United States Capitol. While studying at Georgetown Law, Navy was designated a Global Law Scholar and externed for multiple federal district courts, including the U.S. District Court for the District of North Dakota and the U.S. District Court for the District of Maryland. Following law school, Navy served as an attorney at a prominent global law firm.

Credentials

EDUCATION

- Georgetown University Law Center, Global Law Scholar (2018); Georgetown Journal of International Law, Executive Editor (2017-2018)
- University of Chicago, Bachelor of Arts in Political Science, General Honors; elected to Phi Beta Kappa of Illinois (2015)

ADMISSIONS

Minnesota

New York

U.S. Court of Appeals, District of Columbia

U.S. District Court, Western District of Wisconsin

U.S. District Court, Southern District of New York

U.S. District Court, Eastern District of New York

LANGUAGES

French

Spanish

Honors & Recognitions

- Named a "North Star Lawyer" by the Minnesota State Bar Association for providing at least 50 hours of *pro bono* legal services (2024)
- Global Law Scholar – Georgetown University Law Center (2018)
- Phi Beta Kappa – University of Chicago (2015)

Community

PROFESSIONAL

- New York State Bar Association

Sam Black

ASSOCIATE

Minneapolis

SBlack@RobinsKaplan.com

612.349.5109



Overview

Sam Black is a litigator in the firm's Business Litigation Group, where he focuses on complex civil litigation, with an emphasis on antitrust, healthcare, and class action matters. He represents both plaintiffs and defendants in high-stakes disputes nationwide.

Sam is actively engaged in pro bono work, serving on case teams for Friends of the Boundary Waters and the Giffords Law Center to Prevent Gun Violence. He is also a board member of the Minnesota Lawyer Chapter of the American Constitution Society.

Sam earned his J.D. from the University of Minnesota Law School, where he served as Lead Online Editor of the *Minnesota Law Review*. He graduated *magna cum laude* from St. John's University with dual degrees in Political Science and Hispanic Studies.

Credentials

EDUCATION

- University of Minnesota Law School (2025); *Minnesota Law Review*, Lead Online Editor (2024-2025)
- St. John's University, B.A. in Hispanic Studies and Political Science, Phi Beta Kappa (2021)

ADMISSIONS

Minnesota

LANGUAGES

Spanish

Community

CIVIC

- DFL Lawyers Committee

Exhibit 2

Exhibit 2

In re: Realpage, Inc., Rental Software Antitrust Litigation (No. II)

Firm Name: Robins Kaplan LLP**Reporting Period: Inception through March 31, 2026**

NAME	TITLE	CUMULATIVE HOURS	CURRENT HOURLY RATE	CUMULATIVE LODESTAR
Kozen, Geoffrey H.	PT	3601.80	\$1,190.00	\$4,286,142.00
Slaughter, Stacey P.	PT	3741.90	\$1,345.00	\$5,032,855.50
Undlin, Thomas J.	PT	422.90	\$1,470.00	\$621,663.00
Hurt, J. Austin	C	1868.80	\$1,105.00	\$2,065,024.00
Barstad, Eric P.	C	127.10	\$1,105.00	\$140,445.50
Black, Samuel R.	A	295.90	\$760.00	\$224,884.00
Chang, Heather*	A	77.90	\$635.00	\$49,466.50
Chen, Stephanie A.*	A	528.60	\$860.00	\$454,596.00
Gomez, Luis D.*	A	33.20	\$635.00	\$21,082.00
Keiper, Caitlin E.	A	3381.10	\$950.00	\$3,212,045.00
Moroney, Julie C.*	A	927.80	\$950.00	\$881,410.00
Song, Laura*	A	1759.50	\$950.00	\$1,671,525.00
Thompson, Navy A	A	966.00	\$950.00	\$917,700.00
Bernhagen, Nicole R.	PR	1084.70	\$430.00	\$466,421.00
Gerald, Emily C.*	PR	10.4	\$545.00	\$5,668.00
Howells, Nathan J.	PR	12.30	\$410.00	\$5,043.00
Sanderson, Isabella S.	PR	10.80	\$520.00	\$5,616.00
Smith, Alexandra C.*	PR	38.5	\$435.00	\$16,747.50
Workman, Kim	PR	66.00	\$520.00	\$34,320.00
Holly, Benjamin A.	SA	1052.7	\$450.00	\$473,715.00
Holly, Benjamin A.**	SA	1576	\$350.00	\$551,600.00
Hughes, Timothy	SA	777.3	\$450.00	\$349,785.00
Hughes, Timothy**	SA	381.6	\$350.00	\$133,560.00
Ivory, Mary	SA	106.2	\$450.00	\$47,790.00
Ivory, Mary**	SA	1211.7	\$350.00	\$424,095.00
Jamsa, Siobhan M.	SA	830.40	\$540.00	\$448,416.00
Larson, Tamara	SA	1531.4	\$450.00	\$689,130.00
Larson, Tamara**	SA	1831.3	\$350.00	\$640,955.00
Lee, Pao	SA	1299.9	\$450.00	\$584,955.00
Lee, Pao**	SA	1467.3	\$350.00	\$513,555.00
Murray, Emma J.*	SA	555.60	\$450.00	\$250,020.00
Page, Aimee L.	SA	162.10	\$450.00	\$72,945.00
Stafford, Kathleen	SA	274	\$450.00	\$123,300.00
Stafford, Kathleen**	SA	1079.6	\$350.00	\$377,860.00
Word, Kristine**	SA	1454.50	\$350.00	\$509,075.00

Gaupo, Holden R.*	SU	22.3	\$360.00	\$8,028.00
Lyon, Lillie A B.*	SU	21.5	\$360.00	\$7,740.00
Perry, Mitchell Y.*	SU	11.5	\$325.00	\$3,737.50
Ruch, Dominik M*	SU	34.3	\$325.00	\$11,147.50
Adler, Nicholas J.	PS	35.50	\$510.00	\$18,105.00
Cade, Brian J.	PS	21.00	\$510.00	\$10,710.00
Leete, Sarah	PS	168.10	\$235.00	\$39,503.50
Mapel Bloomberg, Kristin	PS	20.00	\$300.00	\$6,000.00
Omodt, Elizabeth W.	PS	21.90	\$235.00	\$5,146.50
Zhan, Ph.D., Congnan	PS	1231.60	\$690.00	\$849,804.00
TOTALS		36134.5		\$27,263,332.00

* Indicates a timekeeper who contributed to the firm's common-benefit work during the litigation but is not currently employed by Robins Kaplan LLP. The billing rate is the last applicable rate for that timekeeper.

**The applied billing rate for a timekeeper undertaking first-level document review is \$350.

Partner (PT)

Counsel (C)

Associate (A)

Staff Attorney (SA)

Summer Associate (SU)

Paralegal (PR)

Professional Services (PS)

Exhibit 3

Exhibit 3**RealPage, Inc., Rental Software Antitrust Litigation (No. II) MDL No. 3071****Firm Name: Robins Kaplan LLP****Date: Inception through March 2026**

Category Name	Total Time per Category	Total Fees per Category
Lead/Liaison/PSC Counsel Calls/Meeting	828.40	\$827,539.00
Lead/Liaison/PSC Counsel Duties	953.40	\$999,677.50
Class/Client Communications	18.00	\$10,951.50
Administrative	285.90	\$156,083.00
Status Conf.	69.20	\$84,662.00
Court Hearing/Appearance	288.30	\$363,362.50
Research	862.70	\$751,625.50
Discovery	4868.50	\$4,903,119.00
Doc. Review	14793.30	\$6,368,790.00
Litigation Strategy & Analysis	3152.70	\$2,902,836.50
Dep. Prep/Take/Defend	4983.60	\$4,422,611.00
Pleadings/Briefs/Pretrial Motions/Legal	2898.40	\$3,063,261.50
Computer Software Analysis	40.00	\$27,600.00
Experts/Consultants	422.10	\$396,019.50
Mediation/Settlement	1670.00	\$1,985,193.50
Trial Prep/Bellwether		
Trial		
Appeal		
Miscellaneous		
Total:	36,134.50	\$27,263,332.00

Exhibit 4

Exhibit 4

RealPage, Inc., Rental Software Antitrust Litigation (No. II) MDL No. 3071

Firm Name: Robins Kaplan LLP

Date: Inception through June 2026

Category Name	Total Fees per Category
Assessment Fees	3,850,000.00
Federal Express / Local Courier, etc.	1,294.82
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	13,800.93
Outside Photocopying	
Hotels	54,036.45
Meals	21,078.82
Mileage	
Air Travel	77,015.03
Deposition Costs	464.50
Lexis/Westlaw	15,222.35
Court Fees	2,327.60
Witness / Expert Fees	
Investigation Fees / Service Fees	
Transcripts	
Ground Transportation (i.e. Rental, Taxis, etc.)	15,126.12
Miscellaneous (Describe)	
Total:	4,050,366.62