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Co-Interim Class Counsel for Plaintiffs and Putative Class

[additional counsel listed on signature block]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

IN RE: SNAP FINANCE DATA BREACH
LITIGATION

Lead Case No. 2:22-cv-00761-TS-JCB

**JOINT DECLARATION OF WILLIAM B. FEDERMAN, M. ANDERSON BERRY,
AND BRIAN D. FLICK IN SUPPORT OF PLAINTIFFS' MOTION AND
APPLICATION FOR ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARDS
TO REPRESENTATIVE PLAINTIFFS**

We, William B. Federman, M. Anderson Berry, and Brian D. Flick, hereby declare, under penalty of perjury, as follows:

1. Mr. Federman is an attorney duly admitted to numerous state and federal Bars, including the Bars of the states of Oklahoma, Texas, and New York. He is a founding member of the law firm Federman & Sherwood and Interim Co-Lead Counsel in the above-referenced action. He submits this declaration in support of Plaintiffs' Motion and Application for Attorneys' Fees, Expenses, and Service Awards to Class Representatives.

2. Mr. Berry is the head of the Complex Litigation Group at Clayeo C. Arnold, A Professional Corporation dba Arnold Law Firm (the "Arnold Law Firm"). He has been licensed to practice law in the state of California since 2009. He is admitted to practice in the U.S. District Courts for Northern, Eastern, Central, and Southern Districts of California, the Northern District of Illinois, the Eastern District of Michigan, the Northern District of Indiana, the District of Colorado and the Southern District of Indiana. He is counsel at the Arnold Law Firm for the Settlement Class and Interim Co-Lead Counsel and he submits this declaration in support of Plaintiffs' Unopposed Motion and Application for Attorneys' Fees, Expenses, and Service Awards to Class Representatives.

3. Mr. Flick is the managing partner of DannLaw's Cincinnati Office and Class Action Practice and has more than fifteen (15) years of class action litigation experience. He is counsel at Dannlaw for the Settlement Class and Interim Co-Lead Counsel and he submits this declaration in support of Plaintiffs' Unopposed Motion and Application for Attorneys' Fees, Expenses, and Service Awards to Class Representatives.

4. On September 11, 2023, Plaintiffs Tracy Tanner, Victor Sanchez, Tameka Montgomery, Sterling Simeon, Monique Graves, Carolyn Sanders, Nick Peppelaar, and Tara

Schulmeister (“Plaintiffs” or “Class Representatives”), on behalf of themselves and all other members of the putative class, and Defendants Snap Finance LLC’s and Snap RTO LLC’s (hereafter collectively the “Defendants” or “Snap”) (collectively, with Plaintiffs, the “Parties”) reached an agreement to settle this Action pursuant to the terms of the Settlement Agreement (the “Settlement Agreement” or “S.A.”). ECF 46-1.¹

I. THE SETTLEMENT REPRESENTS A HIGHLY FAVORABLE RESULT

5. The Settlement was the result of hard-fought negotiations and provides substantial benefits to the Settlement Class, including significant monetary benefits, and identity theft protection and credit monitoring, and corrective remedial measures.

6. Following the initial filing of each of the lawsuits that gave rise to this action and their consolidation before this Court under the lead case *In Re: Snap Finance Data Breach Litigation*, 2:22-cv-00781-TS-JCB, Interim Co-Lead Counsel (“Class Counsel”), together with all other Plaintiffs’ counsel on this case (collectively “Plaintiffs’ Counsel”), continued to investigate the facts of the Data Incident, including gathering all of the information that was available regarding Defendant and the Data Incident, such as all publicly-available documents concerning announcements of the Data Incident and notice of the Data Incident by Defendant to its customers and various states’ Attorneys’ General. On February 9, 2023, Plaintiffs filed the Consolidated Class Action Complaint (“CCAC”). ECF No. 30.

7. Rather than committing to protracted litigation, after the CCAC was filed counsel for the Parties began to exchange information and discuss resolving the case. The Parties exchanged Rule 408 discovery as well as detailed pre-mediation materials. The Parties then

¹ Capitalized terms not otherwise defined shall have the meanings set forth in the Settlement Agreement.

agreed to participate in early mediation with the Honorable John Thornton (“Judge Thornton”) (Ret.), a highly regarded and experienced mediator, and engaged in a months-long process of subsequent settlement negotiations to finalize the Settlement Agreement. Class Counsel also has, since finalizing the Settlement Agreement moved for, and been granted Preliminary Approval, worked to solicit bids for Settlement Administrators, selected a Settlement Administrator, and worked with the Settlement Administrator to effectuate the Notice Plan.

8. Under the terms of the Settlement, Defendant has agreed to provide \$1,800,000 for the creation of a Settlement Fund from which benefits including the following will be provided to the Settlement Class: \$5,000 per Settlement Class Member in compensation for out-of-pocket expenses; \$200 per California Subclass Member who submits a Valid Claim for this benefit up to an aggregate total of \$200,000, with such payments to be reduced *pro rata* if the aggregate amount claimed exceeds \$200,000; up to \$500 for each Settlement Class Member who submits a Valid Claim requesting a *pro rata* payment made from all funds remaining in the Settlement Fund after all other expenses and benefits are paid; twenty-four (24) months of identity protection and credit monitoring services; attorneys’ fees, expenses, and service awards; the cost of the notice program and settlement administration; and the cost of the necessary CAFA notice.

9. Separate from the above, Defendant has agreed to undertake, and separately pay for, remedial measures to prevent any future recurrence of the Data Incident.

10. It is my opinion that the Settlement achieved here represents an excellent result considering the significant benefits to the Settlement Class as well as the risks and delays attendant to further protracted litigation.

II. THE ATTORNEYS' FEES AND EXPENSES ARE FAIR AND REASONABLE

11. Only after an agreement was reached as to the essential terms of the settlement, specifically the benefits to the Settlement Class, were there discussions regarding Settlement Class Counsel's Attorneys' fees and litigation costs and service awards for Class Representatives.

12. As compensation for the substantial benefit conferred upon the Settlement Class, the Settlement Agreement provides that Class Counsel may apply to the Court for Attorneys' fees in an amount equal to thirty percent (30%) of the Settlement Fund of \$1,800,000, or \$540,000; for reasonable litigation expenses up to \$50,000, and for service awards of \$2,500 for each of the eight (8) Class Representatives, all of which is to be paid out of the Settlement Fund.

13. The Notice provided to the members of the Settlement Class advises Settlement Class Members that Class Counsel would apply for an award of attorneys' fees of thirty percent (30%) of the Settlement Fund. As of December 1, 2023, *no* class members have objected to the Settlement or the fee request. This is a strong indicator of the favorability of the Settlement. It further supports the appropriateness of Class Counsel's fee request.

14. Plaintiffs' Counsel aggressively litigated this Action. The tasks Class Counsel performed include, but are not limited to: fully investigating the facts and legal claims; interviewing and vetting potential plaintiffs; preparing the individual complaints; preparing the detailed consolidated complaint; requesting, obtaining, and reviewing numerous documents from Snap regarding the Incident and how it affected Class Members, Snap's remediation efforts, and Snap's insurance coverage and financial condition; drafting a comprehensive mediation statement assessing the legal and factual strengths and weaknesses of the case; participating in a full day mediation that lasted well into the evening hours; participating in months long negotiations to concerning the final terms of the Settlement; drafting the Settlement Agreement and the exhibits

thereto, including the notices and claim form; developing the notice program and distribution plans, including soliciting bids from settlement administrators; preparing and filing the motion for preliminary approval; working with the Settlement Administrator to implement the notice program, including answering questions from Class Members regarding the Settlement and the submission of claims.

15. Plaintiffs' Counsel have decades of experience as class action advocates in general and as advocates in data breach class actions in particular. Taken together, Class Counsel have even more decades of experience.

16. This combined experience enables Settlement Class Counsel to represent Plaintiffs' and Class Members' interests without expending hundreds of hours and substantial financial resources to come up to speed on the subject area.

17. Having worked on behalf of the class since the Data Incident was first announced, evaluated the legal and factual disputes, and dedicated significant time and resources to this litigation, Settlement Class Counsel fully endorse the settlement.

18. Class Counsel coordinated to efficiently allocate work, coordinate assignments, and prevent any work unnecessary for the effective prosecution of this case.

19. In tracking lodestar and expenses in this matter, Plaintiffs' Counsel maintained contemporaneous and detailed time records, which include a description of all work performed and expenses incurred. Further, Class Counsel reviewed the billing and expense reports of Plaintiffs' Counsel, and backup documentation where necessary or appropriate, in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to billed time in the

exercise of billing judgment. Based on this review and the adjustments made, we believe that the time reflected in the lodestar calculation and the expenses for which payment is sought are reasonable and were necessary for the effective prosecution and resolution of the litigation.

20. After the reductions referred to above, the number of hours spent on the litigation by Plaintiffs' Counsel, to date, is 596.30 for a total lodestar of \$387,424.15. This does not include the time spent preparing the fee motion nor the many additional hours of work that will be required from Plaintiffs' Counsel to secure final approval of the Settlement and to oversee the distribution of benefits to Settlement Class Members. A breakdown of the combined lodestar for all Plaintiffs' Counsel as of December 1, 2023 is provided below:

Firm	Attorneys' Rate Range	Hours	Lodestar
Federman & Sherwood	\$500-\$900	68.40	\$60,325.00
Clayco C. Arnold, APC	\$400-\$800	141	\$100,335.00
DannLaw	\$300-\$795	78.30	\$41,358.25
Parsons Behle & Latimer	\$325-\$800	18.10	\$13,572.00
Wucetich & Korovilas LLP	\$750	62.70	\$46,987.5.
Emery Reddy	\$495-\$725	24.40	\$17,460.00
Murphy Law Firm	\$650	78.30	\$50,895.00
Milberg Coleman Bryson Phillips Grossman, PLLC	\$508-\$997	37.80	\$26,483.50
Christensen Young & Associates	\$575	17.60	\$10,120.00
<i>Combined Paralegals</i>	\$200-\$308	69.70	\$19,887.90
	Totals:	596.30	\$387,424.15

21. The 596.30 hours billed by Plaintiffs' Counsel were reasonable and necessary for the prosecution of this case on behalf of Plaintiffs and the Class. Plaintiffs' Counsel's hours and lodestar are minimal for getting a class action case to final approval and were undertaken in a manner to avoid duplication of work. Plaintiffs' Counsel have worked together on many other data breach and data privacy cases across the country and know each other well. Through working together so often, Class Counsel understand each other's strengths and work to divide up the work necessary to prosecute this matter efficiency and effectively.

22. In addition, the hourly rates included in the lodestar are based on the attorney/paraprofessional's current rates and are consistent with hourly rates submitted by Plaintiffs' Counsel, and approved by courts, in other complex class action litigation. The rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. The requested rates are reasonable for this case considering the experience and expertise these particular lawyers have in this area of law.

23. Plaintiffs' Counsel are attorneys who specialize in litigating complex class actions, and have successfully prosecuted and settled numerous data breach class actions, consumer class actions, and other complex litigation throughout the country. Indeed, Class Counsel, Msrs. Federman, Berry, and Flick, are very experienced with handling data breach class actions and collectively are acting as Plaintiffs' counsel in numerous data breach class actions nationwide. *See Exhibit 1, 2, and 3* (firm biographies), attached hereto.

24. Plaintiffs' Counsel have represented Plaintiffs and the Class purely on a contingency fee basis in this matter and have not received any payment for their time, effort, or expenses to date and have passed up other work in order to devote time and resources to this matter.

25. Plaintiffs' Counsel also seek an award for the reimbursement of litigation expenses actually incurred in connection with the prosecution of this case. Since case inception, Plaintiffs' Counsel incurred combined expenses in the amount of \$9,140.20 in connection with the prosecution of the action. Those expenses and charges are summarized by category in the following chart:

EXPENSE	COST
Photocopies and Postage	\$77.96
Filing, Process, Pro Hac Vice, and Legal Notice	\$3,293.74
Mediation Fees	\$3,406.80
Travel Expenses	\$1,768.83
Lexis, Westlaw, Online Library Research, PACER	\$592.87
TOTAL	\$9,140.20

26. The expenses pertaining to this case are reflected in the books and records of Plaintiffs' Counsel. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses. These expenses were reasonable and necessary in prosecuting the claims and achieving the Settlement for the Class.

27. The Notice sent to potential Settlement Class Members stated Class Counsel would request reimbursement of litigation costs not to exceed \$50,000.00. Class Counsel's requested reimbursement of \$9,140.20 is less than one-fifth (1/5) of this amount.

III. THE REQUESTED SERVICE AWARDS ARE WARRANTED

28. Plaintiffs also seek service awards in the amount of \$2,500 for each of the eight Plaintiffs (for a combined total of \$20,000.00). The Plaintiffs initiated and oversaw this litigation for the benefit of the Class, and it is due to their services that the favorable Settlement was obtained. Among other things, the Plaintiffs answered detailed questionnaires and provided essential information to Plaintiffs' Counsel; collected documents and other evidence that supported the claims alleged in the complaint; agreed to face invasive and time consuming discovery, if

necessary; reviewed pleadings and coordinated with Plaintiffs' Counsel as to the status of, and strategy for, the Action; conferred multiple times with Plaintiffs' Counsel about the settlement negotiations and provided meaningful input about what potential benefits were most important to them; and considered and approved the Settlement terms on behalf of the Class.

29. The sacrifices of time undertaken by the Plaintiffs in furtherance of this Action on behalf of absent Class Members warrants the Court's approval of the requested service awards. The requested \$2,500 amount is reasonable in consideration of Plaintiffs' substantial contributions to the case. The active participation and efforts expended by Plaintiffs in prosecuting this Action materially aided, and indeed were necessary to, the Settlement achieved.

IV. CONCLUSION

30. In our professional opinion, the Settlement represents an excellent result for the Settlement Class. It is also our opinion that the requested award of 30% of the Settlement Fund in attorneys' fees, the requested reimbursement of litigation expenses in the amount of \$9,140.20, and the requested service awards of \$2,500 to each of the Plaintiffs are reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of December 2023, at Oklahoma City, Oklahoma.

By: /s/ William B. Federman
WILLIAM B. FEDERMAN (*PRO HAC VICE*)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of December 2023, at Sacramento, California.

By: /s/ M. Anderson Berry
M. ANDERSON BERRY (*PRO HAC VICE*)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of December 2023, at Lakewood, Ohio.

By: /s/ Brian D. Flick
BRIAN D. FLICK (*PRO HAC VICE*)

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2023, a copy of the foregoing pleading was filed electronically with the Clerk of Court to be served by operation of the court's electronic filing system to all counsel of record.

/s/ M. Anderson Berry

EXHIBIT 1

FEDERMAN & SHERWOOD

(An Association of Attorneys and Professional Corporations)

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FIRM RESUME

WILLIAM B. FEDERMAN. Education: Boston University (B.A., cum laude, 1979); University of Tulsa (J.D., 1982); Phi Alpha Delta (Treasurer, 1980-1982). Admitted to practice: United States District Courts for the following Districts: Western, Northern and Eastern, Oklahoma; Eastern and Southern, New York; Southern, Northern, Eastern and Western, Texas; Eastern and Western, Arkansas; District of Columbia; District of Colorado; Central and Northern Districts of Illinois; Northern District of Ohio; District of Nebraska; Eastern District of Michigan; Eastern District of Wisconsin; United States Court of Appeals for the following Circuits: First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleventh and Federal; and United States Supreme Court. Lectures/Publications: “Class Actions, New Rules and Data Breach Cases,” 40th Annual OCBA Winter Seminar 2019; “A Case Study of Ethical Issues in Complex Litigation and Trends in Class Certification,” 39th Annual OCBA Winter Seminar, 2018; “Talkin’ About Insurance Coverage and Complex Litigation: What Every Lawyer and Client Should Know,” 38th Annual OCBA Winter Seminar, 2017; “Securities Litigation: Using Data to Make the Case,” by Bloomberg BNA, 2016; “The Changing Landscape for Prosecution of Financial Claims Involving Insolvent Companies” 37th Annual OCBA Winter Seminar, 2016; “Current Status of Securities Class Actions: Where are the Courts Taking Us?” Houston Bar Association, 2014. “Class & Derivative Actions and Securities Litigation,” 2013 Annual Meeting of the American Bar Association; “Litigation and Employment Law Update,” Securities Industry Association Compliance and Legal Division; “Inside a Disclosure Crisis”, 30th Annual Northwest Securities Institute Annual Meeting and sponsored by the Washington Bar Association; “Managing Directors’ Liability,” 3rd Annual Energy Industry Directors Conference and sponsored by Rice University; “Executive Liability - 2009 D & O Market Trends,” Chartis Insurance; “Derivative Actions and Protecting the Corporation – Critical Issues in Today’s Banking,” Oklahoma Bar Association and the Oklahoma Bankers Association; “Arbitration - What Is It? Why Should a Lawyer Suggest or Use It?,” Oklahoma Bar Association; “The Attorney and Accountant as Targets in Failed Financial Institution Litigation,” American Bar Association Trial Practice Committee; “Effective Arbitration in the 1990’s - Adapting to Build a Successful Practice,” Oklahoma County Bar Association; “Current Issues in Direct Investments and Limited Partnerships: The Litigation Scene From All Perspectives,” American Bar Association Litigation Section; “Stockbroker Litigation and Arbitration,” Securities Arbitration Institute. Author: “Who’s Minding the Store: The Corporate Attorney-Client Privilege,” 52 O.B.J. 1244, 1981; “Potential Liability From Indirect Remuneration in Private Oil and Gas Offerings,” 11 Sec. Reg. L.J. 135, 1983; “Capitalism and Reality Meet in the Courts. . . Finally,” 59 O.B.J. 3537, 1987; “Class Actions, New Rules & Data Breach Cases,” Annual OCBA Winter Seminar, 2019. Membership: Arbitration Panel, New York Stock Exchange; Federal Bar Association; Oklahoma County Bar Association (Committee on Professionalism, 1987-1990); Oklahoma Bar Association (Civil Procedure/Evidence Code, Lawyers Helping Lawyers Assistance Program and Rules of Professional Conduct Committees, 2017-2020); American Bar Association (Committee on Securities Litigation and Corporate Counsel); American Inns of Court (Barrister 1990-1993 and Master 2002-2004); inducted into the Outstanding Lawyers of America, 2003; received the Martindale-Hubbell peer review rating of AV Preeminent in both ethical standards and legal ability; recognized as one of the “Top Lawyers of 2013” for excellence and achievements in the legal community; Litigation Counsel of America (Trial Lawyer & Appellate Lawyer Honorary Society). Awards/Honors: Securities Litigation and Arbitration Law Firm of the Year in Oklahoma – 2018 (Global Law Experts Annual Awards); Securities Litigation and Arbitration Law Firm of the Year in Oklahoma – 2019, 2020 (Corporate INTL Magazine); Oklahoma Super Lawyers list by Thomson Reuters – 2019; Recognized for Exceptional Service and Outstanding Performance on

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behalf of the Federal Bar Association (Oklahoma City Chapter) Pro Bono Program – 2018-2019, 2020, Oklahoma Super Lawyer for 2022.

STUART W. EMMONS. (In Memoriam) Education: University of Oklahoma (J.D., 1987, with distinction); University of Oklahoma (B.B.A., Accounting, 1984, with distinction). Admitted to practice: 1987, Oklahoma; 1987, U.S. District Court for the Western District of Oklahoma; 1990, U.S. District Court for the Northern District of Oklahoma; 1992, U.S. Court of Appeals, Tenth Circuit; 1994, U.S. Court of Appeals, Eighth Circuit; U.S. Patent and Trademark Office; 2002, U.S. District Court for the District of Colorado; U.S. District Court for the Southern District of Texas; 2003, U.S. Court of Appeals, Second Circuit; 2004, U.S. District Court for the Northern District of Texas; U.S. Court of Appeals, Fifth Circuit; 2005, United States Supreme Court; 2005 U.S. Court of Appeals, Fourth Circuit; 2015, U.S. Court of Appeals, First Circuit; 2016, U.S. Court of Appeals, Ninth Circuit and U.S. Court of Appeals for the First Circuit. 1988-1989, Law Clerk to the Hon. Layn R. Phillips, U.S. District Court for the Western District of Oklahoma. Published Decisions: *American Fidelity Assurance Company v. The Bank of New York Mellon*, 810 F.3d 1234 (10th Cir. 2016); *Paul Spitzberg v. Houston American Energy Corporation, et al.*, 758 F.3d 676 (5th Cir. 2014); *Patipan Nakkhumpun v. Daniel J. Taylor, et al.*, 782 F.3d 1142 (10th Cir. 2015); Membership: Oklahoma County and Oklahoma Bar Associations.

SARA E. COLLIER. Education: Oklahoma Christian University (B.S. 2000); Oklahoma City University School of Law (J.D., 2004). Admitted to practice: Oklahoma; 2005, U.S. District Courts for the Western, Eastern and Northern Districts of Oklahoma; 2007, U.S. District Court for the Southern District of Texas; and 2007, United States Court of Appeals for Veterans Claims in Washington, DC. Membership: Oklahoma Bar Association, American Bar Association.

KENNEDY M. BRIAN. Education: University of Central Oklahoma (B.M. in Musical Theater, 2018, cum laude; Minor in Real Estate Finance), University of Oklahoma (J.D., 2021) (Dean's Honor Roll; Academic Achievement Award, Trial Techniques; American Indian Law Review). Admitted to practice: Oklahoma 2021; U.S. District Court for the Eastern District of Oklahoma, 2022; U.S. District Court for the Western District of Oklahoma, 2022; U.S. District Court for the Northern District of Oklahoma, 2023. Membership: Oklahoma Bar Association, Federal Bar Association, Junior League of Oklahoma City, and Oklahoma County Bar Association. Prior to joining Federman & Sherwood, Ms. Brian was actively involved in litigation on various estate planning, probate, and trust matters.

MEAGON R. EAGON. Education: East Central University (B.S. in Legal Studies, 2013, with honors; Minor in Mass Communications); Oklahoma City University School of Law (J.D. 2017, with honors; Dean's List; Faculty Honor Roll; Merit Scholar; Class Treasurer; Pro Bono Service Award 2015-2016; Dean's Service Award 2017). Admitted to practice: Oklahoma 2017, U.S. District Court for the Eastern District of Oklahoma, U.S. District Court for the Western District of Oklahoma, U.S. District Court for the Northern District of Oklahoma, Chickasaw Nation of Oklahoma, and Choctaw Nation of Oklahoma. Membership: Oklahoma County Bar Association, Oklahoma Bar Association, Federal Bar Association. Prior to joining Federman & Sherwood, Ms. Eagon actively practiced in insurance defense and general civil litigation.

JESSICA A. WILKES. Education: Baylor University School of Law (J.D. 2021, with honors; Dean's Academic Excellence Full-Tuition Scholarship; Baylor Law Review, Technical Editor & Alumni Relations Coordinator; Research Assistant for Dean and Professors; Baylor Barrister Society). Admitted to practice: Oklahoma 2021, Membership: Oklahoma Bar Association; Oklahoma Bar Association, Women in Law; Friends of Trivera; Junior League of Oklahoma City. Prior to joining Federman & Sherwood, Ms. Wilkes actively practiced in litigation for the Oklahoma Attorney General's Office.

OF COUNSEL:

JOHN CHARLES SHERWOOD. Education: Texas Christian University, (BBA, magna cum laude, 1981); Baylor School of Law (J.D., 1984). Areas of Practice: Litigation. Board Certified: Civil Trial Law, Personal Injury Trial Law, Texas Board of Legal Specialization. Organizations: Texas Trial Lawyers, Association of Trial Lawyers of America, Dallas Trial Lawyers Association, Dallas Bar Association, Former Chairperson of the Solo and Small Firm Section of the Dallas Bar Association (1999), Member of the College of the State Bar of Texas and founding President of Citizens For a Fair Judiciary (Political Action Committee). Licenses and Courts of Practice: Member of the State Bar of Texas, National Board of Trial Advocacy, Licensed as a Certified Public Accountant by the Texas State Board of Public Accountancy, admitted to practice before the United States Tax Court, United States District Court, Northern District of Texas, United States Fifth Circuit Court of Appeals, and the United States Supreme Court. Papers Presented: *Other People's Money*, Presented to the Dallas Bar Association, Solo and Small Firm Section; Recognition: "Top Attorneys in Texas, Business Litigation," (2012).

JOSHUA D. WELLS. Education: Oklahoma Baptist University (B.A. 2004); Oklahoma City University College of Law (J.D. 2008) (Dean's List, Faculty Honor Roll, OCU American Trial Lawyers Association Moot Court Team, 2008; Staff Member, Law Review, 2006-07; Executive Editor, Law Review, 2007-08). Admitted to practice: Oklahoma, 2008; U. S. District Court for the Western District of Oklahoma; 2009, U.S. District Court for the Eastern District of Oklahoma; 2011, U.S. District Court for the Northern District of Oklahoma; 2012, U.S. Court of Appeals for the Tenth Circuit; 2016, U.S. Court of Appeals, Fourth Circuit. Membership: Oklahoma Bar Association; Federal Bar Association; American Bar Association. Publication: *Stuck in the Mire: The Incomprehensible Labor Law*, 34 Okla. City U.L. Rev. 131 (2009). Experience: Research Assistant to J. William Conger, General Counsel and Distinguished Lecturer of Law, Oklahoma City University and President of the Oklahoma Bar Association (2007-08). General Counsel for Reaching Souls International (2013-2016). Mr. Wells has significant experience in complex and class action litigation in various state and federal courts, with more than a decade of experience protecting consumer and shareholder rights. Mr. Wells knows how to efficiently prosecute complex cases to conclusion and practices in areas of estate planning, probate, and guardianships for both children and adults. He is the recipient of the Federal Bar Association Pro Bono Exceptional Service Award (2019) and is a leader in his church.

PARALEGALS:

SHARON J. KING. Ms. King has worked in the legal community for over twenty years, after having worked in the securities and insurance industry for over fifteen years. She primarily works on insurance and civil litigation.

JANE E. ADAMS. Mrs. Adams has over 25 years of Administrative and Finance experience focusing her career on Human Resources. Additionally, she has first-hand experience with FEMA response as well as government contractual administration.

TIFFANY R. PEINTNER. Mrs. Peintner has worked in the legal community for over ten years. Before joining Federman & Sherwood, Mrs. Peintner worked in patent law, oil and gas, probate, banking and real estate, family law, personal injury and insurance defense. She works in securities and civil litigation for the firm.

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FRANDELIND V. TRAYLOR. Mrs. Traylor has worked in the legal community for over fifteen years. She provides class action, securities and derivative litigation, and product liability support for the firm.

LACRISTA A. BAGLEY. Ms. Bagley has worked in the legal community for over twenty years. Before joining Federman & Sherwood, Ms. Bagley worked primarily in bankruptcy law that focused on Chapter 11's and corporate liquidations. She has previous experience with estate planning, family law, civil defense, personal injury and medical malpractice. She works in securities, derivatives, and civil litigation for the firm.

LAW CLERK:

TANNER R. HILTON. Education: Texas A&M University (B.S. in Political Science, 2019); Oklahoma City University School of Law (J.D., 2022, Dean's List Spring of 2021; Order of the Barristers; Native American Law Student Association Moot Court Team, 2020-2022; CALI Award for Secured Transactions (2021)). Mr. Hilton graduated from Oklahoma City University School of Law in May of 2022 and is awaiting admission to the Bar.

SELECT CASES WHERE FEDERMAN & SHERWOOD HAS SERVED AS LEAD OR CO-LEAD COUNSEL

CONSUMER CLASS ACTIONS	COURT
Accreditation Commission for Education in Nursing (Data Breach)	USDC Northern District of Georgia
Albany ENT & Allergy	Supreme Courts of the State of New York, Albany County
Altice USA, Inc. (Data Breach)	USDC Southern District of New York
Artech, LLC (Data Breach)	USDC Northern District of California
AssistRx, et al (Data Breach)	USDC Middle District of Florida
AT&T Services Inc.	USDC Northern District of Texas
Avem Health Partners, Inc. (Data Breach)	USDC Western District of Oklahoma
Brinker International, Inc. (Chili's) (Data Breach)	USDC Middle District of Florida
Bryan Cave Leighton Paisner LLP Data Breach Litigation	USDC Northern District of Illinois
Burgerville, LLC (Data Breach)	Circuit Court, State of Oregon, Multnomah County
Carvin Wilson Software, LLC (Data Breach)	USDC District of Arizona
CentralSquare Technologies, LLC (Data Breach)	USDC Southern District of Florida
Christie Business Holdings Company PC (Data Breach)	USDC Central District of Illinois
Dakota Growers Pasta Company, Inc. (Food Mislabeling)	USDC District of Minnesota/District of New Jersey
Filters Fast, LLC (Data Breach)	USDC Western District of Wisconsin
Hy-Vee, Inc. (Data Breach)	USDC Central District of Illinois
Intelliheartx (Data Breach) (Executive Lead Counsel)	USDC Northern District of Ohio
Lansing Community College (Data Breach) (PSC)	USDC Western District of Michigan
LeafFilterNorth, LLC/LeafFilter North of Texas, LLC (Data Breach)	USDC Western District of Texas
Lime Crime, Inc. (Data Breach)	USDC Central District of California
Medical Review Institute of America, LLC (Data Breach)	USDC District of Utah
Mednax Services, Inc. (Data Breach)	USDC Southern District of Florida
Mercer University (Data Breach)	USDC Middle District of Georgia
Peachtree Orthopaedic Clinic, P.A. (Data Breach)	Superior Court of Forsyth County, State of Georgia
Physician's Business Office, Inc. (Data Breach)	In the Circuit Court of Wood County, West Virginia
PracticeMax (Data Breach)	USDC District of Arizona
Progressive Casualty Insurance (Data Breach)	USDC Northern District of Ohio
OneTouchPoint (Data Breach) (PSC)	USDC Eastern District of Wisconsin
Smile Brands (Data Breach)	USDC Central District of California
Snap Finance (Data Breach)	USDC District of Utah
Solara Medical Supplies, LLC (Data Breach)	USDC Southern District of California
TD Ameritrade, Inc. (Data Breach)	USDC District of Nebraska
TMX Finance Corporation Services, Inc. (Data Breach) (PSC)	USDC Southern District of Georgia
Wichita State University (Data Breach)	USDC District of Kansas
Yuma Regional Medical Center (Data Breach)	USDC District of Arizona
SHAREHOLDER DERIVATIVE CASES	
Abercrombie & Fitch Company	USDC Southern District of Ohio
American Superconductor Corporation	Superior Court, Commonwealth of Massachusetts
Antares Pharma, Inc.	USDC District of New Jersey
Arrowhead Research Corporation	Superior Court, State of California, County of Los Angeles
Carrier Access Corporation	USDC District of Colorado
Catalina Marketing Corporation	Chancery Court of the State of Delaware
Cell Therapeutics, Inc.	USDC Western District of Washington
Computer Associates	USDC Eastern District of New York
Delcath Systems, Inc.	USDC Southern District of New York
Dendreon Corporation	USDC Western District of Washington
Digital Turbine, Inc.	USDC Western District of Texas
Doral Financial Corporation	USDC Southern District of New York
Dynavax Technologies Corporation	Superior Court of the State of California; county of Alameda
First BanCorp.	USDC District of Puerto Rico
Flowers Foods, Inc.	USDC Middle District of Georgia
Genta, Inc.	USDC District of New Jersey
GMX Resources, Inc.	District Court of Oklahoma County, Oklahoma
Great Lakes Dredge & Dock Corporation	Circuit Court of Illinois, Dupage County Chancery Division
Host America Corporation	USDC District of Connecticut
Motricity Inc.	USDC Western District of Washington
NutraCea	Superior Court of Maricopa County, Arizona
Nuverra Environmental Solutions, Inc.	Superior Court of Maricopa County, Arizona
Nyfix, Inc.	USDC District of Connecticut
OCA, Inc.	USDC Eastern District of Louisiana
ONEOK, Inc.	District Court of Tulsa County, Oklahoma
PainCareHoldings, Inc.	USDC Middle District of Florida

SELECT CASES WHERE FEDERMAN & SHERWOOD HAS SERVED AS LEAD OR CO-LEAD COUNSEL

Seitel, Inc.	USDC Southern District of Texas
Six Flags Entertainment Corporation	USDC Northern District of Texas
Spectrum Pharmaceuticals, Inc.	USDC District of Nevada
Southwest Airlines Co.	USDC Northern District of Texas
The Spectranetics Corporation	USDC District of Colorado
ValueClick, Inc.	USDC Central District of California
Zix Corporation	USDC Northern District of Texas
SECURITIES CLASS ACTIONS	
Amyris, Inc.	USDC, Northern District of California
Bellicum Pharmaceuticals, Inc.	USDC Southern District of Texas
Broadwind Energy, Inc.	USDC Northern District of Illinois
China Valves Technology, Inc.	USDC Southern District of New York
Cryo-Cell International, Inc.	USDC Middle District of Florida
Delta Petroleum, Inc.	USDC District of Colorado
Direxion Shares ETF Trust	USDC Southern District of New York
Ener1, Inc.	USDC Southern District of New York
Exide Technologies	USDC Central District of California
Galena Biopharma, Inc.	USDC, District of New Jersey
Houston American Energy Corp.	USDC Southern District of Texas
Image Innovations Holdings, Inc.	USDC Southern District of New York
IZEA, Inc.	USDC Central District of California
Motive, Inc.	USDC Western District of Texas
Quest Energy Partners LP	USDC Western District of Oklahoma
Secure Computing Corporation	USDC Northern District of California
Superconductor Technologies, Inc.	USDC Central District of California
UTi Worldwide, Inc.	USDC Central District of California
Unistar Financial Service Corp.	USDC Northern District of Texas
MDL PROCEEDINGS	
In re: Anthem, Inc. (Data Breach-Participating Counsel)	USDC, Northern District of California
In re: Equifax, Inc. (Data Breach-Participating Counsel)	USDC Northern District of Georgia
In re: Farmers Insurance Co.	USDC Western District of Oklahoma
In re: Home Depot, Inc. (Executive Committee)	USDC Northern District of Georgia
In re: Mednax Services Inc. (Data Breach - Co-Lead Counsel)	USDC Southern District of Florida
In re: Premera Blue Cross (Data Breach-Participating Counsel)	USC, District of Oregon
In re: Samsung Electronics America, Inc.	USDC Western District of Oklahoma
DEAL CASES (MERGERS)	
Easylink Services International Corp.	Superior Court of Gwinnett County, Georgia
Genon Energy, Inc.	Chancery Court of the State of Delaware
Lawson Software, Inc.	Chancery Court of the State of Delaware
Network Engines, Inc.	Chancery Court of the State of Delaware
Paetec Holding Corp. Shareholder Litig.	Chancery Court of the State of Delaware
Williams Pipeline Partners, L.P.	District Court of Tulsa County, Oklahoma
Xeta Technologies, Inc.	District Court of Tulsa County, Oklahoma
ERISA LITIGATION	
Winn-Dixie Stores	USDC Middle District of Florida

EXHIBIT 2



Arnold Law Firm Biography

Sacramento Office

865 Howe Avenue
Sacramento, CA 95825
916-777-7777
916.239.4778 (d)
415.595.3302 (c)

Los Angeles Office

6200 Canoga Ave, Ste 375,
Woodland Hills, CA 91367
Phone: 747.777.7748

justice4you.com



Founded in 1975 by Clayeo C. Arnold, the Arnold Law Firm is a litigation-oriented practice in Sacramento and Woodland Hills, California. In keeping with its founding principles, our firm consciously works for the interests of individual people and small businesses — not for large corporations or insurance companies.

The Arnold Law Firm prosecutes class action, mass tort, *qui tam*, product defect, employment, and personal injury cases. We pride ourselves on being a practice of trial lawyers, typically trying a minimum of ten cases per year to verdict. In addition to our practice throughout the state of California in both state and federal courts, we pursue class action, *qui tam* and multi-district litigation claims on a nationwide basis.

Our team of ten attorneys collectively encompass a broad, diverse professional background, including plaintiff contingency work, public entity representation, criminal defense, and civil defense. We have current and past board members of Capital City Trial Lawyers Association, as well as members of numerous prestigious professional organizations, including the American Board of Trial Advocates, American Association for Justice, Association of Trial Lawyers of America, and Consumer Attorneys of California.

Our firm's operating structure is based on teams directed towards specific practice areas. These teams regularly and intentionally collaborate and exchange information between their practice areas to improve the quality of representation for all of our clients.



Arnold Law Firm Biography

(continued)

Over four decades the Arnold Law Firm has developed a respected and extensive network of co-counsel and experienced contract counsel to rapidly expand our capabilities as necessary on an *ad hoc* basis (e.g., document review). We employ a robust staff of highly qualified, experienced assistants and paralegals to ensure that attorney time is spent in the most efficient manner possible.

The Arnold Law Firm employs technology to increase productivity, resulting in lower hourly billing, even though adverse parties eventually pay those bills. The firm increases efficiencies by using template software, client management software, and secure internet-based client management for mass tort or multi-plaintiff litigation. We also invest in appropriate billing and tracking software for contemporaneous hourly record keeping.

The Arnold Law Firm places substantial value on representing clients in a manner that is both effective and courteous. Integrity with clients, the courts, and adverse counsel are all considered to be as indispensable as successful results.

Our highly accomplished counsel has a long history of successfully handling class actions across a range of industries, including data breach cases.



M. Anderson Berry Biography



The Arnold Law Firm has a proven track record of success and the ability to work efficiently and cooperatively with others. In addition, our firm has the availability and resources necessary to litigate complex class actions.

M. Anderson Berry

M. Anderson Berry heads the data breach complex litigation and *qui tam* practices for the Arnold Law Firm. He brings substantial experience in complex litigation matters with a history of litigating in an efficient and practical manner, including Lead Class Counsel, Co-Lead Class Counsel, and Plaintiff's Executive Committee.

Mr. Berry has an extensive background in privacy and consumer/government fraud litigation, actively participating in a currently sealed False Claims Act case involving widespread cybersecurity fraud upon the United States, and the class action litigations filed in federal courts across the nation, set out below.

Mr. Berry was first selected as the Northern California Super Lawyers Rising Star in 2015 in the field of complex civil litigation.

Before joining the Arnold Law Firm in 2017, Mr. Berry worked as an Assistant United States Attorney for the Eastern District of California. As part of the Affirmative Civil Enforcement unit, Mr. Berry handled a wide variety of complex cases, recovering millions of dollars for the United States.

Before working for the Department of Justice, Mr. Berry practiced at one of the world's largest law firms, Jones Day, where he represented clients in international arbitration and complex commercial litigation, including defending class action allegations.



M. Anderson Berry Biography

(continued)

Mr. Berry attended the University of California, Berkeley, where he majored in English and graduated with highest honors. Anderson was inducted into the Phi Beta Kappa Honor Society and served as President of the English Undergraduate Associate.

After working as a private investigator for both criminal and civil investigations in the San Francisco Bay Area, Anderson graduated from U.C. Berkeley School of Law, where he was a Senior Editor for both the *Berkeley Journal of Criminal Law* and *Berkeley Journal of International Law*.

He was admitted to the California Bar in 2009 and is admitted to practice in the Northern, Eastern, Southern and Central Districts of California. Mr. Berry is also admitted to practice in the Northern District of Illinois, the Eastern District of Michigan and the Southern District of Indiana.

Mr. Berry was raised in Moraga, California.

Select Data Breach Cases

In Re: Entertainment Partners Data Breach Litigation,
2:23-cv-06546-CAS (C.D. Ca.) (Co-Lead Counsel)

In Re: Snap Finance Data Breach, 2:22-cv-00761-TS-JCB
(D.UT.) (Co-Lead Counsel)

Ware v. San Geronimo Memorial Hosp., CVRI2301216 (Sup.
Crt of CA, Riverside) (Co-Lead Counsel)

Holmes v. Elephant Insurance Company, et al., 3:22-cv-
00487-JAG (E.D. VA.) (Co-Lead Counsel);

In Re: Arthur J. Gallagher Data Breach Litigation, 1:21-cv-
-04056 (N.D.Ill.) (Co-Lead Counsel);

In Re: CaptureRx Data Breach Litigation, 5:21-cv-00523
(W.D.TX.)(Co-Lead Counsel) (settled);

Rossi v. Claire's Stores, 1:20-cv-05090 (N.D. Ill.) (Co-Lead
Counsel) (settled);

Desue v. 20/20 Eye Care Network, Inc. et al., 0:21-cv-
61275 (S.D. Fla.) (Executive Comm.);



**M. Anderson Berry
Biography**

(continued)

In re: Mednax Services, Inc. Customer Data Security Breach Litigation, 21-MD-02994 (S.D. Fl.) (Executive Comm.);

Bowdle v. King's Seafood Co. LLC, 8:21-cv-01784-CJC-JDE, (CD. Cal.)(Class Counsel) (settled);

Hashemi et al. v. Bosley, Inc. 2:21-cv-00946 (CD. Cal.) (Class Counsel) (settled);

Heath et al. v. Insurance Technologies Corp et al., 3:21-cv-01444 (N.D. Tex.) (Class Counsel) (settled);

Carrera Aguallo et al. v. Kemper Corporation et al., 1:21-cv-01883 (N.D. Ill.) (Class Counsel) (settled);

Ahn et al. v. Herff Jones, LLC, 1:21-cv-01381 (S.D. Ind.) (settled);

Bitmouni v. Paysafe Limited, 3:21-cv-00641-JCS (N.D. Cal.);

Gaston v. FabFitFun, Inc., 2:20-cv-09534 (C.D. Cal.) (Class Counsel) (settled);

Hamid et al. v. Canon, U.S.A., Inc. et al. 1:20-cv-06380-AMD-SJB (E.D.N.Y.);

In Re: Ambry Genetics Data Breach Litigation, 8:20-cv-00791 (C.D. Cal.) (settled);

In Re: Hanna Andersson and Salesforce.com Data Breach Litigation, 3:20-cv-00812-EMC (N.D. Cal.) (Co-Lead Class Counsel) (settled);

In Re: Morgan Stanley Data Security Litigation, 1:20-cv-05914 (S.D.N.Y.) (settled);

Pfeiffer et al. v. RadNet, Inc., 2:20-cv-09553-RGK-SK (C.D. Cal.)(Class Counsel) (settled);

Thomsen v. Morley Companies, Inc., 1:22-cv-10271-TLL (E.D. Mi.) (settled);

In re Lakeview Loan Servicing Data Breach Litigation, 1:22-cv-20955-DPG (S.D. Fl.);

Myron Schellhorn et al v. Timios, Inc., 2:21-cv-08661-VAP-JC (C.D. Ca.) (settled).

EXHIBIT 3

DannLaw

Since 2008, DannLaw has represented individuals and businesses in a wide array of legal matters. The attorneys of DannLaw are established and respected trial lawyers who represent clients in simple litigation, complex litigation, appellate litigation, and class action lawsuits. DannLaw has recovered millions of dollars on behalf of thousands of individuals and businesses across the country including the states of Ohio, Illinois, Oregon, Florida, Kentucky, New Jersey and Tennessee.

Marc E. Dann

Marc Dann is the Managing Partner of DannLaw. He is also a Partner of Advocate Attorneys LLP in Washington DC. These practices focus on representing clients who have been harmed by banks, debt buyers, debt collectors and other financial predators and providing access legal services for traditionally underserved working class and middle class Americans. Dann has fought for the rights of tens of thousands of consumers and brought class actions lawsuits on behalf of clients in both private practice and as Ohio's Attorney General.

As Ohio Attorney General, Marc Dann initiated securities fraud claims against the creators of mortgage- backed securities on behalf of Ohio's public pension funds. He assembled Ohio's Organized Crime Commission to mobilize Mortgage Fraud Task Forces in Ohio's major cities to prosecute those engaged in mortgage fraud and predatory lending, Dann's office challenged the standing of mortgage servicers to foreclose in cases where the State of Ohio was a party. Dann also worked with former Ohio Supreme Court Chief Justice Thomas Moyer to organize over 1,200 volunteer lawyers to represent homeowners in foreclosure.

After leaving the Attorney General's Office, Marc Dann began representing Ohio homeowners facing foreclosure pro bono. During this time, he recognized that the issues faced by individual homeowners represented patterns of practice throughout the mortgage servicing industry. In response, he mobilized a team and created DannLaw in order to fight for the rights of Ohioans.

Since DannLaw was founded, it has grown to represent clients facing a range of consumers' rights issues including in class action. While mortgage servicing litigation practice the foundation of DannLaw, Marc Dann has developed a comprehensive collection of tools designed to help clients stay in their homes including prosecuting more than 25 Class Action cases. . He is a recognized national leader in the use of federal mortgage servicing regulations to hold servicers accountable for their actions.

Utilizing these tools has led Marc Dann to host seminars explaining these techniques to other attorneys. These working groups help to elevate the defense of clients across the nation while

allowing attorneys to recognize patterns of practice that affect all citizens.

This collaborative spirit also applies to the communities of which DannLaw is a part. Marc Dann serves on the Lakewood Ohio Tree Advisory Committee. Marc Dann and DannLaw also support the Cleveland International Film Festival each year.

Dann prioritizes professional organizations as well as being a member of the American Bar Association, the Federal Bar Association, the Cleveland Metropolitan Bar Association, the National Association of Consumer Advocates and the National Association of Consumer Bankruptcy Attorneys. He is a member of the Society of Attorneys General Emeritus and the Democratic Attorneys General Association.

Marc Dann is a regular contributor to *Attorney at Law Magazine* and the *Cleveland Metropolitan Bar Association Magazine*. His work has also been featured in *NACBA's Consumer Bankruptcy Journal* and *Legal Ink Magazine* and *Working Class Perspectives compiled by Georgetown University*.

Dann is currently acting as appointed lead counsel in two pending matters - *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256. Dann is currently serving as Liaison Counsel in *Migliaccio, et al. v. Parker-Hannifin Corporation*, NDOH Case No. 1:22-cv-00835 as well as Liaison Counsel for the Guardians of NAS Children in *In re: National Prescription Opiate Litigation*, NDOH 17-md-02804. Dann has previously been appointed and served as lead (or co-lead) counsel in other matters including *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Miller, et al. v. Intellos, Inc.*, NDOH Case No. 1:17-cv-00763, *George Koustis, et al. v. Select Portfolio Servicing*, NDOH Case No. 1:20-cv-02425 and *Ethan Ryder, et al v. Wells Fargo Bank, N.A.*, SDOH Case No. 1:2019-cv-00638. Dann is acting as putative co-counsel in other matters listed in the pending cases summary below.

Dann is admitted to practice in Ohio, the District of Columbia, the United States Court of Appeals for the Sixth Circuit, the United States Court of Appeals for the Seventh Circuit the United States Court of Appeals for the Ninth Circuit, United States District Court for the Southern District of Ohio, United States District Court for the Northern District of Ohio, United States District Court for the Northern District of Illinois, The Northern District of Indiana, The Western District of Tennessee, the United States District Court for the Western District of New York and the United States District Court for the Northern District of New York. He has pro hac vice admission in Cook County, Illinois, Washoe County Nevada, United States District Court for the Southern District of Florida, United States District Court for the Middle District of Florida, United States District Court for the Northern District of Georgia, United States District

Court in Nevada, United States District Court for the Western District of New York, United States District Court for the Southern District of New York, United States District Court for the Eastern District of New York, United States District Court for the District of New Jersey, United States District Court for the Eastern District of Pennsylvania, United States District Court for the Western District of Washington, the United States District Court for the Western District of North Carolina, and the United States District Court for the Central District of California

A native of Cleveland, Ohio, Marc Dann is a 1984 graduate of the University of Michigan, where he earned a bachelor's degree in history. He graduated from the Case Western Reserve University School of Law in 1987.

Andrew Wolf (Of Counsel)

Since opening his law practice in September 1997, Andrew Wolf, who joined DannLaw in October 2021, has become one of the most prominent, prolific, and respected consumer protection attorneys and Class Action in the United States.

Along with resolving hundreds of cases on behalf of individuals, Mr. Wolf has been certified as Class Counsel in 138 action case involving New Jersey's Consumer Fraud and Truth-in-Consumer Contract Warranty and Notice Acts, the federal Fair Debt Collection Practices Act, and other statutes. In addition to aggressively and successfully representing his clients, Andrew has generously shared his knowledge, expertise, and experience with the legal community. He taught consumer protection law to New Jersey's legal services attorneys in 2002, 2003, and from 2007 to 2013, was a featured panelist at the 2003 New Jersey State Bar Convention, the 2004 Consumer Law Day, and the 2005 New Jersey Judicial College. He has provided continuing legal instruction in the areas of consumer and class action law, served as a panelist on programs conducted by Rutgers Law School's Eric R. Neisser Public Interest Program, and was an adjunct professor at his alma mater, Rutgers University School of Law at Newark from 2013-2016 and 2018-2019.

Mr. Wolf has earned numerous honors and awards for his work on behalf of consumers. He has been designated as a SuperLawyer annually since 2014, received the Debevoise-Eakeley Award from New Jersey Legal Services in 2010 in recognition of his unparalleled support for the organization, and was the recipient of the 2018 Robert J. Cirafesi Chancery Practice Award from the Middlesex County Bar Association.

Mr. Wolf earned a bachelor's degree at Queens College (CUNY) in 1980, a Masters in Business Administration from St. John's University in 1987, and his Juris Doctorate at Rutgers University School of Law in 1995. He was admitted to practice in the state of New Jersey in 1995, the Federal District Court of New Jersey in 1996, the Third Circuit Court of Appeals in 1999, and

the United States Supreme Court in 2010.

He is a member of the National Association of Consumer Advocates (NACA), a Board Member of the Consumers League of New Jersey, the New Jersey State Bar Association, the Middlesex County Bar Association, and was appointed by the New Jersey Supreme Court to serve on the Special Civil Part Practice Committee for five terms.

He is also heavily involved in alternative dispute resolution as both a mediator and arbitrator. He is approved as a Mediator by the State of New Jersey, Department of Law and Public Safety, the State of New Jersey Judiciary, and as a Trainer in Mediation and Conciliation Skills for New Jersey's Administrative Office of the Courts.

Brian D. Flick

Mr. Flick advocates for plaintiffs and defendants nationwide in state and federal trial and appellate courts. His practice areas include Consumer Bankruptcy debtor representation in the areas of Chapter 7, 12, and 13, consumer fraud, real estate litigation, foreclosure defense, student loan debt defense, Bankruptcy Litigation, and Mortgage Servicing Litigation under the Real Estate Settlement Procedures Act and the Truth in Lending Act.

He has experience in all phases of litigation including extensive discovery, substantive motion practice, trial practice, and appellate practice. Mr. Flick has worked vigorously for over 14 years to protect the rights of consumers and to pursue recovery for plaintiffs and defendants in numerous civil matters including class actions.

Mr. Flick graduated from Adrian College with a B.A. In Political Science. He earned his law degree from the Ohio Northern University Pettit College of Law. While in law school, he received several academic awards and appeared on the Dean's List multiple times.

Since beginning the practice of law, he has been very active in local and national attorney associations. He is active with the Cincinnati Bar Association's Bankruptcy Committee. Brian also sits on the Volunteer Lawyers Committee for the Cincinnati Bar Association. He is the current Sixth Circuit Listserv Moderator for the National Association of Consumer Bankruptcy Attorneys, a position he has held since May 2017. He is the current Ohio State Chair for the National Association of Consumer Advocates, a position he has held since May 2017. He was also appointed by the Board of Trustees as a member of the Unauthorized Practice of Law Committee of the Cincinnati Bar Association, a position he has held since June 2017. Mr. Flick has been a frequent speaker at Cincinnati Bar Association, NACBA, and NACA events since 2014 as well as assisting with DannLaw's Regulation X and Z Seminars that have taken place

since 2016.

Mr. Flick is currently working as a putative co-lead counsel on several other pending matters including *Lajuan Fleetwood v. NewRez LLC*, Hamilton County Court of Common Pleas Case No. A2201533, *Patrick D. Trivison, et al. v. Federal National Mortgage Association, et al.*, NDOH 1:20-cv-00711, *Jackson, et al. v. Velocity Investments, LLC*, EDPA Case No. 20-cv-02524, and *Crews, et al. v. Titlemax of Delaware, et al.*, MDPA 1:22-cv-168. Mr. Flick was appointed co-lead counsel on *In re: Southern Ohio Health Systems Data Breach*, Hamilton County Court of Common Pleas Case No. A 2101886., *Ethan Ryder, et al v. Wells Fargo Bank, N.A.*, SDOH Case No. 1:2019-cv-00638 and worked as associate on multiple class actions that DannLaw has handled including *Ifeoma Ebo, et al. v. Wells Fargo Bank, et al.*, NDCA Case No. 3:22-cv-02535, *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256. Mr. Flick was appointed to the Interim Executive Committee in *Angus, et al. v. Flagstar Bank, FSB*, EDMI Case No. 2:21-cv-1067.

Mr. Flick is admitted to the practice of law in the State of Ohio, State of Kentucky and the Federal District Courts and Bankruptcy Courts in the following jurisdictions: Southern District of Ohio; Northern District of Ohio; District of Colorado; Northern District of Illinois; Northern District of Indiana; Southern District of Indiana; Eastern District of Kentucky; Western District of Kentucky; Eastern District of Tennessee; Western District of Tennessee; Eastern District of Michigan and the Western District of Michigan. He has also been admitted *pro hac vice* in civil litigation in the following United States District Courts for either resolved or pending matters: District of Oregon, District of Nevada, Western District of North Carolina, Southern District of New York, Eastern District of Pennsylvania, Central District of California, Middle District of Florida and Southern District of Florida. He is also admitted in the United States Court of Appeals for the Sixth Circuit.

Javier Merino

Attorney Javier Merino is the managing partner of the New Jersey and New York offices of DannLaw. Mr. Merino advocates for plaintiffs and defendants nationwide in state and federal trial and appellate courts. His practice areas include Consumer Bankruptcy debtor representation in the areas of Chapter 7 and 13, consumer fraud, real estate litigation, foreclosure defense, Bankruptcy Litigation, and Mortgage Servicing Litigation under the Real Estate Settlement Procedures Act and the Truth in Lending Act.

He has experience in all phases of litigation including extensive discovery, substantive motion

practice, trial practice, and appellate practice. A licensed attorney since 2013, Mr. Merino has worked vigorously for almost nine (9) years to protect the rights of consumers and to pursue recovery for plaintiffs and defendants in numerous civil matters including class actions.

Mr. Merino graduated from Rutgers University with a B.A. In Economics in 2010. He earned his law degree from St. John's University School of Law in 2013. While in law school, he received several academic awards and appeared on the Dean's List.

Since beginning the practice of law, he has been very active in local and national attorney associations. He is active with the National Association of Consumer Advocates and the National Association of Consumer Bankruptcy Attorneys. Mr. Merino has been a frequent speaker at New Jersey State Bar Association, NACBA, and NACA events since 2017 as well as assisting with DannLaw's Regulation X and Z Seminars that have taken place since 2016. Mr. Merino most recently litigated a successful reversal of summary judgment at the United States Court of Appeals for the Second Circuit in the matter of *Kim Naimoli v. Ocwen Loan Servicing, LLC*, CA2 case number 2020-01683, a case of first impression at the Circuit Level on Regulation X of the Real Estate Settlement Procedures Act.

Mr. Merino is admitted to the practice of law in the State of New Jersey, State of New York and the Federal District Courts and Bankruptcy Courts in the following jurisdictions: District of New Jersey; Southern District of New York; Eastern District of New York; Northern District of New York; and the Western District of New York. He has also been admitted in the United States Court of Appeals for the Second Circuit and the United States Court of Appeals for the Third Circuit.

Michael A. Smith, Jr.

Michael Smith is a graduate of the Ohio State University and the University of Georgia School of Law. Mr. Smith is admitted to practice in the State of Ohio, State of New Jersey, United States District Court for the Northern and Southern Districts of Ohio, and United States District Court for the District of New Jersey.

Mr. Smith represents consumers in class actions involving unfair and deceptive trade practices, privacy violations, antitrust matters, and defective products. Smith has been active in federal litigation, including class action litigation in the state and federal courts of Ohio and New Jersey.

Mr. Smith has worked as associate counsel in many class actions the firm has handled including *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Koustis, et al. v. Select Portfolio Servicing, Inc.*, NDOH Case No. 1:20-cv-02425-DAP, *In re: Sonic Corp. Customer*

Data Security Breach, NDOH Case No. 17-md-2807, *In re: National Prescription Opiate Litigation*, NDOH Case No. 17-md-02804, *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD, and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 125.

Emily White

After spending nearly a decade as a public interest attorney, Emily White joined DannLaw. She is the Managing Partner of the firm's Columbus, Ohio office where she practices student loan debt, disability rights, Class Action and consumer law.

Emily received her law degree from the City University of New York School of Law, where she served on the editorial board of the New York City Law Review. Following law school, she served for two years as a judicial law clerk to the Honorable Sylvia H. Rambo, U.S. District Court Judge for the Middle District of Pennsylvania.

In 2009 she joined the Legal Aid Society of Cleveland, where she represented low-income consumers during the historic recession and foreclosure crisis. While at Legal Aid she authored a chapter of Ohio Consumer Law focused on student loans and helped student loan borrowers resolve defaults and apply for student loan discharges.

In 2013 she joined Disability Rights Ohio as a staff attorney. In that role Emily represented individuals with disabilities in employment and higher education matters and offered advice about issues related to student loans and vocational rehabilitation services.

Emily received an undergraduate degree in Philosophy from the University of Illinois at Urbana-Champaign. Before attending law school she served as an AmeriCorps volunteer with Habitat for Humanity NYC.

Dan Solar

Attorney Dan Solar has brought consumer cases against loan modification mills and financial institutions, won motions to vacate older foreclosure judgments on behalf of DannLaw clients, and unearthed significant evidence of fraud and robo-signing via the legal discovery process.

A licensed attorney since 2009, Dan earned a B.A. in Political Science from Denison University in 2006 and a J.D. from the University of Akron School of Law in 2009. He served an internship at the Cuyahoga County Public Defender's Office and during his years in law school worked as a law clerk for a firm in Akron, Ohio where he focused on a variety of tort matters and insurance

litigation.

In addition to his extensive legal training, Attorney Solar's experience in the origination of mortgage loans gives him a specialized, in-depth and invaluable knowledge of every facet of the mortgage lending process.

Attorney Solar is admitted to practice in the State of Ohio, the United States District Courts for the Northern and Southern Districts of Ohio, and the Eleventh Circuit Court of Appeals.

REPRESENTATIVE CLASS ACTIONS CASES

Completed Cases:

In re: Southern Ohio Health Systems Data Breach, Hamilton County Court of Common Pleas Case No. A 2101886. \$1.95 Million recovery for a nationwide class of 420,433 persons whose personal financial information and/or personal health information was stolen as part of a data breach.

Ryder et al v. Wells Fargo United States District Court for the Southern District of Ohio Case No. 19-cv-00638. \$ 12 Million recovery for borrowers who were denied loan modifications as a result of a computer software error.

Koustis, et al. v. Select Portfolio Servicing, Inc., 1:20-cv-02425-DAP NDOH (Final Approval Order and Judgment entered 12/08/2021) - \$184,000.00 recovery for a nationwide class of borrowers whose lender failed to properly respond to qualified written requests, requests for information, and/or notices of error because of an improper active litigation, active mediation, or active bankruptcy exception.

In re Sonic Corp. Customer Data Security Breach, 1:17-md-2807 NDOH (Order granting Plaintiffs' Unanimous and Unopposed Motion to Appoint Attorney William B. Federman as Interim Lead Counsel, Attorney Marc Dann as Interim Liaison Counsel, and Attorneys Thomas A. Zimmerman, Jr., Michael R. Fuller, Melissa R. Emert and Miles Clark as Plaintiffs' Steering Committee signed 01/03/2018) - Class action for a nationwide class of individuals who had their personal and financial data stolen due to insufficient protection of that information by a retailer.

Miller et al. v. Inteleos, Inc., Case No. 1:17-cv-00763-DAP NDOH - \$570,000 recovery for a nationwide class of sonographers who took and passed a certification examination but the testing agency improperly scored their results and falsely reported that they failed the examination.

Lieber v. Wells Fargo Bank, N.A., Case No. 1:16-cv-02868-PAG NDOH - \$425,000 recovery for a nationwide class of borrowers whose lender failed to properly respond to qualified written requests, requests for information, and/or notices of error because of an improper active litigation, active mediation, or active bankruptcy exception.

Clark, et al. v. Lender Processing Services, Inc, et al., Case No. 2:12-cv-02187 NDOH

Hlavasa, et al. v. Bank of America, et al., Case No. 2:2011-cv-00530 NDOH

Turner, et al. v. Lerner, Sampson & Rothfuss, Case No. 1:11-cv-00056 NDOH

Andrew R. Wolf, of Counsel to DannLaw has been certified as class counsel individually in the following cases as of January 2022:

1. Mathis v. Hillside Auto Mall, Inc., et al.
Docket No. UNN-L-5674-01 (Superior Court of New Jersey, Union County)
2. United Consumer Financial Services Co. v. Carbo
Docket No. HUD-L-3438-02 (Superior Court of New Jersey, Hudson County)
3. Wilson v. Burt, et al.
Docket No. MER-L-1947-03 (Superior Court of New Jersey, Mercer County)
4. Wilson v. AutoNation, et al.
Docket No. MID- L-1319-04 (Superior Court of New Jersey, Middlesex County)
5. Galatis v. Psak, Graziano, Piasecki & Whitelaw, et al.
Docket No. MID-L-5900-04 (Superior Court of New Jersey, Middlesex County)
6. Moreno v. Lawrence Lincoln-Mercury, Inc.
Docket No. MID-L-2869-02 (Superior Court of New Jersey, Middlesex County)
7. Muller-Moreno, et. al. v. Malouf, et. al.
Docket No. MID-L-4464-02 (Superior Court of New Jersey, Middlesex County)
8. Romano and Smerling v. Dayton Auto Center, et al.
Docket No. MID-L-5176-02 (Superior Court of New Jersey, Middlesex County)
9. Losgar v. Freehold Chevrolet, Inc.
Docket No. MON-L-3145-02 (Superior Court of New Jersey, Monmouth County)
10. Davis v. Liccardi, et al.
Docket No. UNN-L-001546-03 (Superior Court of New Jersey, Union County)
11. Wenger, John v. East Brunswick Buick Pontiac GMC etc.
Docket No. MID-L-5617-03 (Superior Court of New Jersey, Middlesex County)
12. Arteaga v. Moda Furniture, et al.
Docket No. MRS-L000980-05 (Superior Court of New Jersey, Morris County)

13. Barrood v. IBM
Docket No. MER-L-0843-98 (Superior Court of New Jersey, Mercer County)
14. Robilotti v. Garden Irrigation et al.
Docket No. MON-L-002147-03 (Superior Court of New Jersey, Monmouth County)
15. Valley National Bank v. Jeffery Cahn
Docket No. MER-L-0504-04 (Superior Court of New Jersey, Mercer County)
16. Grandberry and Deloatch v. Pressler & Pressler
Docket No. MID-L-001356-06 (Superior Court of New Jersey, Middlesex County)
17. Hudson United Bank v. Wendy D. Chase
Docket No. HNT-L-37-04 (Superior Court of New Jersey, Hunterdon County)
18. DeBenedetto vs. Del Monte Corporation, et al.
Docket No. MID-L-003163-06 (Superior Court of New Jersey, Middlesex County)
19. Nthenge, et al. v. Pessler and Pressler, et al.
Docket No. MID-L-001363-06 (Superior Court of New Jersey, Middlesex County)
20. Estep v. Smythe Volvo, Inc., et al.
Docket No. UNN- L-004184-03 (Superior Court of New Jersey, Union County)
21. Miller, Jennifer, et al v. CVS Corporation
Docket No. MID-L-003855-06 (Superior Court of New Jersey, Middlesex County)
22. Fisher, Samuel v. Walgreen Co. et al.
Docket No. MID-L-004090-06 (Superior Court of New Jersey, Middlesex County)
23. Picket v. Triad, et al.
Docket No. MID- L-007727-05 (Superior Court of New Jersey, Middlesex County)
24. Clemons & Jordan vs. Donna Thompson, Esq.
Docket No. MON-L-001980-07 (Superior Court of New Jersey, Monmouth County)
25. Fisher v. Hallmark Marketing Corporation et al.
Docket No. MID-L-6465-06 (Superior Court of New Jersey, Middlesex County)
26. Wells v. DTD Enterprises, Inc.
Docket No. MID-L-9012-07 (Superior Court of New Jersey, Middlesex County)
27. Bessie Brown v. Hayt, Hayt & Landau, LLC
Docket No. ESX-L-7042-07 (Superior Court of New Jersey, Essex County)

28. Miller v. Weltman, Weinberg & Reis, Co., L.P.A.
Docket No. MID-L-6248-07 (Superior Court of New Jersey, Middlesex County)
29. Santos & Velez v. Samuel Silver, Esq. et al
Docket No. MID-L-08188-07 (Superior Court of New Jersey, Middlesex County)
30. Cruz, Romeo R. v. Condor Capital Corp.
Docket No. MID-L-2108-06 (Superior Court of New Jersey, Middlesex County)
31. Walker, Michael v. Hill Wallack LLP
Docket No. MID-L-003480-08 (Superior Court of New Jersey, Middlesex County)
32. Portfolio Recovery Associates, LLC v. Patricia M. Barnes, et al
Docket No. MID-L-009791-06 (Superior Court of New Jersey, Middlesex County)
33. Debra Smerling & Sheila Smerling v. Harrah's Entertainment Inc.
Docket No. MID-L-008733-04 (Superior Court of New Jersey, Middlesex County)
34. Moore, William v. NCO Financial Systems Inc. consolidated with Meekins, Elizabeth v. NCO Financial Systems Inc.
Case # 2:08-CV-01936-JAG-MCA (Federal District Court of New Jersey)
35. Wenger, Christopher & Jennifer. vs. Cardo Windows, Inc. et al
Docket No.: MID-L-4924-07 (Superior Court of New Jersey, Middlesex County)
36. The Provident Bank v. Patricia Deprospo
Docket No.: UNN-L-1393-09 (Superior Court of New Jersey, Union County)
37. Parkin, Nicole v. Bank of America, N.A.
Docket No. MID-L-8170-07 (Superior Court of New Jersey, Middlesex County)
38. Mohrle, Dawn v. Timco, Inc. d/b/a Planet Honda
Docket No. UNN-L- 000953-08 (Superior Court of New Jersey, Union County)
39. Quinonnes-Malone, Carmen v. Pellegrino & Feldstein, L.L.C., et al
Case # 2:08-cv-03295-JAG-MCA (Federal District Court of New Jersey)
40. Kho, Ernesto vs. Nationwide Home Relief, LLC
Docket No. MID-L-4245-09(Superior Court of New Jersey, Middlesex County)
41. Peabody, Gail v. Legal Loan Modifications, Inc., et al
Docket No. MID-L-6981-09 (Superior Court of New Jersey, Middlesex County)
42. Coleman, Lori and Henry, Jahod v. Edison Auto Sales, Inc. et al

Docket No. MID-L-8168-09 (Superior Court of New Jersey, Middlesex County)

43. Wenger, Christopher vs. Freehold Subaru, LLC et al.
Docket No. MON-L-4003-10 (Superior Court of New Jersey, Monmouth County)
44. Richardson vs. Allied Interstate, Inc., et al.
Case No. 09-2265-MLC-DEA (Federal District Court of New Jersey)
45. Kim Robinson and Jacob Robinson v. Donna L. Thompson
Case No. 3:10-cv-04143-JAP-TJB (Federal District Court of New Jersey)
46. Mark Epstein & Mira Epstein v. Sears Roebuck & Co., Inc.
Docket No. UNN-L-1732-09 (Superior Court of New Jersey, Union County)
47. Elaine Drake v. Wells Fargo Bank, N.A.
Docket No. MID-L-4177-09 (Superior Court of New Jersey, Middlesex County)
48. Dipopolo & Kawajian v. Ramsey Nissan, Inc.
Docket No. BER-L-10319-09 (Superior Court of New Jersey, Bergen County)
49. John Tortora v. Guardian Protective Services, et al.
Docket No. MID-L-1041-10 (Superior Court of New Jersey, Middlesex County)
50. Te, Montesclaro, & Te v. Thrift Investment Corporation, et al.
Docket No. MID-L-2061-10 (Superior Court of New Jersey, Middlesex County)
51. Berger, Garrett and Kelter, Bonny vs. PCUSA Corporation
Docket No. MID-L-3211-11 (Superior Court of New Jersey, Middlesex County)
52. Pollitt vs. DRS Towing, LLC
Case No. 3:10-cv-01285 (Federal District Court of New Jersey)
53. Sheikh/Sheikh vs. Maxon Hyundai, et al
Docket No. UNN- L-000476-09 (Superior Court of New Jersey, Union County)
54. Bosland, Rhonda v. Warnock Dodge, Inc. et al
Docket No. MRS- L-844-06 (Superior Court of New Jersey, Morris County)
55. Martell, Rhonda v. Warnock Dodge, Inc. et al
Docket No. MRS- L-1085-09 (Superior Court of New Jersey, Morris County)
56. Alper, Todd v. Warnock Motor Sales, Inc. d/b/a/ Warnock Ford, et al
Docket No. MRS- L-1640-10 (Superior Court of New Jersey, Morris County)

57. Richard R. Froumy and Victoria M. Carr v. Stark & Stark, et al
Case No. 3:09-CV-4890-LHG (Federal District Court of New Jersey)
58. Pollitt v. Wachovia Dealer Services, Inc., et al
Case No. 3:10-cv-01285-DEA (Federal District Court of New Jersey)
59. Chulsky v. Hudson Law Offices, P.C., et al
Case No. 3:10-CV-03058-LHG (Federal District Court of New Jersey)
60. Williams v. The CBE Group, et al
Case No. 2:11-cv-3680-PS (Federal District Court of New Jersey)
61. Petersen, Daniel vs. Central Jersey Pool & Supply Co., Inc., et al.
Docket No. MON-L-4044-11 (Superior Court of New Jersey, Monmouth County)
62. Eisenberger, Ruth vs. Boston Service Co., Inc. d/b/a Hann Financial Svc. Corp.
Docket No. MID-L-10366-09 (Superior Court of New Jersey, Middlesex County)
63. Lileikyte, Asta vs. Bergen Auto Eenterprises, LLC d/b/a Wayne Mazda
Docket No. MID-L-6222-10 (Superior Court of New Jersey, Middlesex County)
64. Lippert, Tammy vs. Edison Motor Cars, Inc. d/b/a Brad Benson Mitsubishi/Hyundai
Docket No. MID-L-6599-10 (Superior Court of New Jersey, Middlesex County)
65. Diop, Aissatou vs. I.C. Systems, Inc.
Docket No. MID-L-1062-11 (Superior Court of New Jersey, Middlesex County)
66. Bush, Tanya vs. Renovo Services, LLC, et als.
Docket No. MID-L-5132-10 (Superior Court of New Jersey, Middlesex County)
67. Avalishvili, Zhanetta vs. Reussille Law Firm, LLC, et al
Case No. 3:12-cv-02772-TJB (Federal District Court of New Jersey)
68. Martina, Sophia vs. LA Fitness International, LLC
Case No. 2:12-cv-02063-WHW (Federal District Court of New Jersey)
69. Korrow, Margaret vs. Aaron's, Inc., et al.
Case No. 3:10-cv-6317-MAS (Federal District Court of New Jersey)
70. Hernandez, Rodolfo vs. Enhanced Recovery Company, LLC, et al.
Docket No. MID-L-2640-12 (Superior Court of New Jersey, Middlesex County)
71. Walker, Michael vs. Cutolo Law Firm, LLC, et al.
Docket No. MID-L-7498-11 (Superior Court of New Jersey, Middlesex County)

72. Mukoma, Stephen vs. Fleet Lease Network, Inc.
Docket No. HUD-L-2707-12 (Superior Court of New Jersey, Hudson County)
73. Wenger, Christopher D. vs. South Brunswick Furniture, Inc., etc., et al
Docket No. MID-L-000479-12 (Superior Court of New Jersey, Middlesex County)
74. Katz, et al. vs. Live Nation, Inc., et al.
Case No. 09-cv-03740-DEA (Federal District Court of New Jersey)
75. Blaine, Joanne vs. Pressler & Pressler, LLP
Docket No. MID-L-583-11 (Superior Court of New Jersey, Middlesex County)
76. Davis, Ollie vs. First Financial Federal Credit Union, et al.
Docket No. MON-L-4493-11 (Superior Court of New Jersey, Monmouth County)
77. Khweye, Uz C./Rivera, Pura vs. Leaders Financial Company, et al.
Docket No. ESX-L-5584-10 (Superior Court of New Jersey, Essex County)
78. Khweye, Uz C. vs. Mullooly, Jeffrey, Rooney & Flynn, LLP
Docket No. ESX-L-5585-10 (Superior Court of New Jersey, Essex County)
79. Gordon, Ella and Martha vs. Feinstein, Raiss, Kelin & Booker, LLC
Case No. 3:13-cv-00089-MAS (Federal District Court of New Jersey)
80. Robinson, Shaquanna vs. J & C Auto Outlet, LLC
Docket No. MID-L-1961-13 (Superior Court of New Jersey, Middlesex County)
81. Allen, Stacy vs. National Auto Outlet
Docket No. MID-L-004905-13 (Superior Court of New Jersey, Middlesex County)
82. Willis, Laura vs. Galleria Route One Corporation, et al.
Docket No. MID-L-001315-12 (Superior Court of New Jersey, Middlesex County)
83. Fonville, Shanique vs. Clover Commercial Corporation, et al.
Docket No. UNN-L-000563-13 (Superior Court of New Jersey, Union County)
84. Caruso, Jerry/Brady, Sandra v. WOW, et als.
Docket No. MID-L-3112-13 (Superior Court of New Jersey, Middlesex County)
85. Fonville, Shanique and Nekisha vs. Schwartz Barkin & Mitchell, et al.
Docket No. UNN-L-001097-13 (Superior Court of New Jersey, Union County)
86. Malangone, Dolores v. Izzy's Inc. etc., et al.
Docket No. OCN-L-515-13 (Superior Court of New Jersey, Ocean County)

87. Ortiz-Rodriguez, Norma vs. Pressler & Pressler, LLP
Docket No. MID-L-007253-13 (Superior Court of New Jersey, Middlesex County)
88. Norris, Michael/Tatem, Christopher vs. Bill Me Later, Inc. & Eichenbaum and Stylianou, LLC
Docket No. MID-L-002364-15 (Superior Court of New Jersey, Middlesex County)
89. Gambrell, Eugene & Doris and Patel, Falguni vs. Hess Corporation, Inc.
Docket No. MID-L-7761-12 (Superior Court of New Jersey, Middlesex County)
90. Lechtrecker, Joshua vs. Pressler & Pressler, LLP
Docket No. MID-L-001933-15 (Superior Court of New Jersey, Middlesex County)
91. The Estate of Theresa Torsiello by Vincent Torsiello Executor vs. McGovern Legal Services, LLC
Case No. 3:14-cv-03814-DEA (Federal District Court of New Jersey)
92. Tirado, Ricardo vs. Deluxe Auto Group, LLC, et al.
Docket No. HUD-L-1069-14 (Superior Court of New Jersey, Hudson County)
93. Bowman, Lethrop vs. Lyons, Doughty & Veldhuis, P.C.
Docket No. MID-L-4474-14 (Superior Court of New Jersey, Middlesex County)
94. Celario, Michael vs. Route 22 Nissan, Inc.
Docket No. MID-L-000260-14 (Superior Court of New Jersey, Middlesex County)
95. McKenzie, Yusef vs. New City Funding Corp.
Docket No. MID-L-1952-14 (Superior Court of New Jersey, Middlesex County)
96. Thorne, Kimberly vs. Live Nation, Entertainment Inc.
Case No. 3:09-cv-03740-DEA (Federal District Court of New Jersey)
97. Pabon/Alvarado vs. Metro Auto Exchange
Docket No. UNN-L-1426-14 (Superior Court of New Jersey, Union County)
98. Rufo, Melissa vs. Alpha Recovery Corp.
Case No. 2:15-cv-0865-SRC (Federal District Court of New Jersey)
99. Politi, Andrew v. Pressler & Pressler, LLP, etc.
Docket No. MID-L-7273-15 (Superior Court of New Jersey, Middlesex County)
100. Nunez, Angel and Eve vs. Donna L. Thompson, Esq.
Docket No. MID-L-00949-15 (Superior Court of New Jersey, Middlesex County)
101. Nepomuceno, Luzvimid vs. Midland Management, Inc.

Case No. 2:14-cv-5719-SDW-SCM (Federal District Court of New Jersey)

102. Stepien, Lisa vs. PNC Financial Services Group, Inc.
Docket No. MID-L-2837-13 (Superior Court of New Jersey, Middlesex County)
103. Politi, Alexa vs. Gil Vigneault, et al.
Case No. 3:15-cv-04425-DEA (Federal District Court of New Jersey)
104. Javan, John vs. LVNV Funding, LLC, et al.
Docket No. MID-L-001866-16 (Superior Court of New Jersey, Middlesex County)
105. Vizthum, Tracy vs. Maguire East Windsor, LLC d/b/a Windsor Nissan
Docket No. MID-L-284-15 (Superior Court of New Jersey, Middlesex County)
106. Qureshi v. OPS 9, LLC
Case No. 2:14-cv-01806 (Federal District Court of New Jersey)
107. Mohammed v. Faloni Association
Docket No. MID-L-7880-13 (Superior Court of New Jersey, Middlesex County)
108. Shumaker v. Vengroff
Docket No. MID-L-5367-15 (Superior Court of New Jersey, Middlesex County)
109. Gomes v. Extra Space Storage, Inc.
Case No. 2:13-cv-929-KSH (Federal District Court of New Jersey)
110. Sefarian v. Carmadella et al.
Docket No. MID-L-005333-15 (Superior Court of New Jersey, Middlesex County)
111. Chung v. Northland Group Inc
Case No. 2:15-cv-06246 (Federal District Court of New Jersey)
112. Chung v. AllianceOne Capital
Case No. 2:15-cv-02905 (Federal District Court of New Jersey)
113. Raff v. Safavieh Livingston LLC
Docket No. ESX-L-2017-15 (Superior Court of New Jersey, Essex County)
114. Guillen v. AAA Limo and Luxury Car Services of East Brunswick
Docket No. MID-L-002661-16 (Superior Court of New Jersey, Middlesex County)
115. Kendall v. Cubesmart L.P., et al.
Case No. 3:15-cv-06098 (Federal District Court of New Jersey)
116. Santiago v. Northland Group Inc.

Case No. 2:15-cv-03608-CLW (Federal District Court of New Jersey)

117. Giulanelli v. Fredco Landscaping LLC
Docket No. ESX-L-004202-16 (Superior Court of New Jersey, Essex County)
118. Seigelstein v. Shrewsbury Motor, Inc. et al.
Docket No. MON-L-4072-15 (Superior Court of New Jersey, Monmouth County)
119. Park v. United Collection Bureau, Inc.
Case No. 2:15-cv-01306 (Federal Court of New Jersey)
120. Watkins v. Pressler & Pressler, LLC
Case No. 2:16-cv-00119-MCA-LDW (Federal District Court of New Jersey)
121. Harris v. General Motors Financial Co. Inc.
Docket No. MID-L-3170-15 (Superior Court of New Jersey, Middlesex County)
122. Shirey v. Project One Autosports LLC
Docket No. ESX-L-006233-16 (Superior Court of New Jersey, Essex County)
123. Sparks v. Service Finance Co., LLC
Docket No. MID-L-2441-17 (Superior Court of New Jersey, Middlesex County)
124. Labidou v. Fleet Lease Network, Inc.
Docket No. HUD-L-5191-15 (Superior Court of New Jersey, Hudson County)
125. Best v. Twin, Inc.
Docket No. ESX-L-8062-16 (Superior Court of New Jersey, Essex County)
126. Patterson v. Volkswagen Credit
Docket No. MID-L-6498-16 (Superior Court of New Jersey, Middlesex County)
127. Bonilla v. Pike Run II LLC
Docket No. MID-L-3986-17 (Superior Court of New Jersey, Middlesex County)
128. Martins v. Signature Pre-Owned LLC et al.
Docket No. HUD-L-3596-17 (Superior Court of New Jersey, Hudson County)
129. Thomas v. Hudson Valley Federal Credit Union
Docket No. ESX-L-8205-18 (Superior Court of New Jersey, Essex County)
130. Gonzalez v. New Century Financial Services Inc.
Docket No. ESX-L-00765-17 (Superior Court of New Jersey, Essex County)
131. McMillin v. The Traf Group Inc.

Case No. 3:18-cv-01734-DEA (Federal District Court of New Jersey)

132. Santiago v. Apothaker Scian P.C. et al.
Case No. 2:16-cv-01432-CCC-SMC (Federal District Court of New Jersey)
133. Pierre-Charles v. Consumer Portfolio Services, Inc.
Case No. 3:17-cv-10025-DEA (Federal District Court of New Jersey)
134. Deltoro v. City Select Auto Sales, Inc.
Docket BUR-L-00709-19 (Superior Court of New Jersey, Burlington County)
135. Mills v. Camping World RV et al.
Case No. 3:18-cv-02283-MAS-TJB (Federal District Court of New Jersey)
136. Browne v. Capital One Bank USA et al.
Docket No MID-L-05583-15 (Superior Court of New Jersey, Middlesex County)
137. Wares v. Guaranteed Motor Towing Service Inc. et al.
Docket No. MID-L-002088-16 (Superior Court of New Jersey, Middlesex County)
138. Roach v. BM Motoring LLC
Docket No. MID-L-001333-13 (Superior Court of New Jersey, Middlesex County)
139. Davis v. Omnisure
Docket No. CAM-L-3742-15 (Superior Court of New Jersey, Camden County)

Pending Cases:

RESPA and Mortgage Servicing Class Action

- DannLaw is putative class co-counsel in *Trivison, et al. v. Federal National Mortgage Association*, United States District Court for the Northern District of Ohio Case No. 20-cv-00711.
- DannLaw is putative class co-counsel in *Lajuan Fleetwood v. NewRez LLC*, Hamilton County Court of Common Pleas Case No. A2201533.
- DannLaw is putative class co-counsel in *Kathryn Forest, et al. v. PHH Mortgage Corporation, et al.*, United States District Court for the District of Rhode Island, Case No. 1:20-cv-00323.
- DannLaw is putative class counsel in *Elaine M. Johnson, et al. v. loanDepot.com LLC*, United States District Court for the Northern District of Ohio Case No. 5:22-cv-00641.
- DannLaw is putative class co-counsel in *Schmitt v. Security National Servicing Corporation*, United States District Court for the Northern District of Ohio Case No. 1:21-cv-01188.

Constitutional Violations

- DannLaw is putative co-counsel in *The State of Ohio, ex rel James Parker, et al. v. The Ohio Department of Job and Family Services, et al.*, Franklin County Court of Common Pleas 21 CV 00524.
- DannLaw is putative class co-counsel in *Tarrify Properties, LLC, et al. v. Cuyahoga County, Ohio, et al.*, United States District Court for the Northern District of Ohio Case No. 19-cv-02293.
- DannLaw is putative class co-counsel in *Alana Harrison, et al. v. Montgomery County, Ohio, et al.*, United States District Court for the Southern District of Ohio Case No. 3:19-cv-00288.
- DannLaw is putative class co-counsel in *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD.
- DannLaw is putative class co-counsel in *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256.

Data Breach/Misuse of Consumer Information -

- DannLaw has been appointed as co-lead in *Desiree Schmitt, et al. v. SN Servicing Corporation*, United States District Court for the Northern District of California, Case No. 21-cv-03355.
- DannLaw has been appointed on the Plaintiff's Executive Committee in *Angus, et al. v. Flagstar Bank, FSB*, United States District Court for the Eastern District of Michigan Case No. 21-cv-10657.
- DannLaw has been appointed as Interim Class Co-Counsel in *Acker, et al. v. ProTech Solutions Inc.*, United States District Court for the Eastern District of Arkansas Case No. 20-cv-00852.
- DannLaw is co-counseling a Class Action for a nationwide class and statewide classes of consumers who were subject to unauthorized automatic payment drafts. DannLaw brought two of the eight lawsuits related to this incident - *Dwayne Friday, et al. v. Nationstar Mortgage, LLC*, United States District Court of the Western District of North Carolina Case No. 1:21-cv-165 and *LaTreece Jones, et al. v. Nationstar Mortgage, LLC*, United States District Court for the Northern District of Illinois Case No. 1:21-cv-3217. All cases are pending settlement and consolidation.
- DannLaw has been appointed Interim Liaison Counsel for a nationwide class and statewide classes of employees and unknown third parties who were victims of a data breach in *Migliaccio, et al. v. Parker-Hannifin Corporation*, United States District Court for the Northern District of Ohio Case No. 1:22-cv-00835.

- DannLaw is co-counseling a Class Action for a nationwide class and statewide classes of employees and patients who were victims of a data breach in *In re: Southern Ohio Health Systems Data Breach*, Hamilton County Court of Common Pleas Case No. A 2101886.
- DannLaw is co-counseling a Class Action for a nationwide class and statewide classes of consumers who were subject to a data breach involving their mortgage servicer in *Morrill v. Lakeview Loan Servicing, LLC, et al.*, United States District Court for the Southern District of Florida Case No. 1:22-cv-20955-DPG.
- DannLaw is local counsel in *Finesse Express, LLC, et al. v. Total Quality Logistics, LLC*, United States District Court for the Southern District of Ohio, Case No. 1:20-cv-00235.

Consumer Class Actions

- DannLaw is putative class co-counsel in *Jackson, et al. v. Velocity Investments, LLC*, United States District Court for the Eastern District of Pennsylvania Case No. 5:20-cv-02524.
- DannLaw is putative class co-counsel in *Crews, et al. v. Titlemax of Delaware, et al.*, United States District Court for the Middle District of Pennsylvania Case No. 1:22-cv-168.

Products Liability

- DannLaw is co-counseling as Local Counsel *Erica Parks, et al. v. The Proctor & Gamble Company*, United States District Court for the Southern District of Ohio Case No. 1:21-cv-00258.
- DannLaw is putative co-counsel in *Tyneshia Ferguson, et al. v. The J.M. Smucker Company*, United States District Court for the Eastern District of Kentucky Case No. 5:22-cv-00173.
- DannLaw is putative co-counsel in *Pisciotti, et al. v. The J.M. Smucker Company*, United States District Court for the Northern District of Ohio Case No. 5:22-cv-01151.

Shareholder Derivative Suit

- DannLaw is co-counseling as Local Counsel a Shareholder Derivative Complaint against a multi-state Managed Care facility. The matter has not proceeded to Class Certification.