

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

CHRISTOPHER GANN, LEANDRE BISHOP,
KEVIN BURKE, ELISA CABEBE, ISRAEL
CHIA, KRISTA COSTA, HILLARY DICK,
JURA GERALD, SEIJI SILER-HYATTE,
JEANINE INGRASSIA, ARNIKA IRELAND,
MONTELL JONES, MICHAEL KANZLER,
ALEXANDRA MCCULLOUGH, TERESE
MIRANDA, AUTUMN PIERCE, ROBERT H.
WEINBERG, LASHANDRIKA WILLIAMS,
AND LAURA WINDOM, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NISSAN NORTH AMERICA, INC., a
California corporation,

Defendant.

Case No. 3:18-cv-00966

CLASS ACTION

**DECLARATION OF TIMOTHY G.
BLOOD IN SUPPORT OF MOTION FOR
AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS FOR CLASS
REPRESENTATIVES**

District Judge Eli Richardson
Courtroom 874
Magistrate Judge Alistair E. Newbern
Courtroom 774

JURY TRIAL DEMANDED

I, TIMOTHY G. BLOOD, declare as follows:

1. I am an attorney duly licensed to practice before all courts of the State of California, before numerous federal circuit courts and am admitted *pro hac vice* to practice before this court. I am the managing partner of the law firm Blood Hurst & O'Reardon, LLP ("BHO"), one of the Co-Lead Class Counsel, and one of the counsel of record for plaintiffs in this action and the related actions, *Weinberg v. Nissan North America, Inc.* No. 17-cv-08867 (N.D. Ill.) and *Costa v. Nissan North America, Inc.* No. 18-cv-11523 (D. Mass.) (collectively, the "Litigation"). This Declaration is submitted in support of Plaintiffs' request for an award of attorneys' fees, expenses, and for service awards for the class representatives. This is in addition to my declaration filed in support of Plaintiffs' preliminary approval motion. However, to the extent possible, I do not restate facts set forth in that declaration. I have personal knowledge of the matters stated herein and, if called upon, could and would competently testify to them.

2. Discovery obtained and work conducted by Co-Lead Class Counsel that was not covered by previous declarations is as follows. At the request of Co-Lead Class Counsel as reflected in lists of topics, specific questions, and document requests, Nissan produced data and information, including almost 1 million lines of warranty claim-related information for the Class Vehicles. The data was scoured by Co-Lead Class Counsel who then developed yet further follow-up questions to be answered by Nissan. These questions and other areas of inquiry regarding Nissan's identification of the defect and steps taken in response were then addressed by Co-Lead Class Counsel in a face-to-face interview with a Nissan engineer. Prior to the interview, Co-Lead Class Counsel provided written questions and topics of inquiry so the engineer could prepare and so the question and answer session would be as productive as possible.

3. Co-Lead Class Counsel also retained the services of Lee M. Bowron, ACAS, MAAA. Mr. Bowron is an actuary who specializes in pricing and valuing extended service contracts and warranty extensions. Using the information provided to him by Plaintiffs' counsel (e.g., number of class vehicles, average CVT replacement costs, failure rate, etc.), Mr. Bowron

was able to estimate the minimum retail value to the Settlement Class of the extended warranty and reimbursement coverage for this Settlement.

4. Following preliminary approval, Co-Lead Class Counsel spent considerable attention overseeing and implementing the dissemination of the Class Notice. This included finalizing the long form, publication and post-card notices and the claim form, drafting the content for the settlement website and the questions and answers links, and reviewing and revising the IVR script.

5. Shortly after preliminary approval, and even before Class Notice was mailed, my office began receiving telephone calls and emails from Class Members. After being trained on the terms of the Settlement and questions Class Members were likely to have, attorneys in my office and the other offices of Co-Lead Class Counsel responded to every email and telephone call, often spending considerable time on the phone with Class Members answering their questions about the Settlement, the settlement benefits and the claim process. To date, my office alone has worked with over 152 people. We have also worked with NNA's counsel to address various Class Member transmission repair issues and other issues that require immediate attention or have unique facts. Generally, each person requires multiple communications in order to provide the information he or she needs or to answer follow-up questions. This work will continue throughout the settlement implementation process.

6. My firm prosecuted this Litigation on a contingent-fee basis with no guarantee of recovery. My firm, along with other Plaintiffs' counsel, incurred 100% of the risk in pursuing this Litigation. My firm has advanced expenses with the understanding we would be entitled to a fee and reimbursement for expenses only if successful.

7. I am generally familiar with the quality and quantity of work done in this case by all lawyers representing Plaintiffs. As one of the Co-Lead Class Counsel, I strived to delegate work in a manner I believed was efficient and achieved results without duplicative efforts.

8. The following information regarding my firm's time and out-of-pocket expenses is taken from time and expense records prepared and maintained by the firm in the ordinary

course of business. The time records were prepared daily or shortly thereafter by each attorney or paralegal working on the Litigation. The expense records are prepared from receipts, expense vouchers, check records and other documents, and are an accurate record of the expenses. I reviewed the printouts and reviewed the backup documentation where necessary. The purpose of these reviews was to confirm the accuracy of the entries on the printouts as well as the reasonableness of the time and expenses committed to the Litigation.

9. The schedule below provides a summary of the hours expended by timekeepers from my firm who performed work in this Litigation. The schedule includes the name of each person who worked on the case, hourly billing rates, the number of hours expended, and the resulting lodestar for each timekeeper. The backgrounds and qualifications of the attorneys who worked on the matter are set forth in the Firm Resume. A true and correct copy of my Firm's Resume is attached hereto as **Exhibit A**.

10. The lodestar calculation is based on the firm's current billing rates at the firm's customary hourly rates charged in all of our cases, and which have been accepted as reasonable by courts throughout this state and other district courts in numerous other class action litigations. *See, e.g., Warner v. Toyota Motor Sales, U.S.A., Inc.*, No. CV 15-2171 FMO (FFMx), 2017 U.S. Dist. LEXIS 77576, at *42-43 (C.D. Cal. May 21, 2017) (approving BHO rates as reasonable given "the prevailing rates in the community for lawyers of comparable skill, experience, and reputation"); *In re Adobe Systems Inc. Privacy Litig.*, No. 5:13-cv-05226-LHK (N.D. Cal. Aug. 13, 2015) (approving hourly rates and time spent by BHO, finding "counsel's hourly rates to be reasonable and in line with the prevailing rates in the community for complex litigation"); *In re Hydroxycut Mktg. & Sales Practices Litig.*, MDL No. 2087, 2014 U.S. Dist. LEXIS 162106, at *192 (S.D. Cal. Nov. 18, 2014) (approving hourly rates of Blood Hurst & O'Reardon, LLP as "typical rates for attorneys of comparable experience"); *Dennis v. Kellogg Co.*, No. 09-cv-1786-L (WMC), 2013 U.S. Dist. LEXIS 163118, at *22-23 (S.D. Cal. Nov. 14, 2013) (approving BHO's hourly rates as "fall[ing] within typical rates for attorneys of comparable experience"); *Johnson v. Gen. Mills, Inc.*, No. 10-61, 2013 U.S. Dist. LEXIS 90338, at *19-21 (C.D. Cal. June

17, 2013) (approving hourly rates and time spent by BHO, stating “[t]he Court has considered class counsel’s rates and finds they are reasonable because of the experience of the attorneys and prevailing market rates”); *In re Skechers Toning Shoe Prods. Liab. Litig.*, MDL No. 2308, 2013 U.S. Dist. LEXIS 67441, at *51-52 (W.D. Ky. May 13, 2013) (approving BHO’s hourly rates, stating that “a lodestar cross-check demonstrates the reasonableness of the fees award”); *Hartless v. Clorox Company*, 273 F.R.D. 630, 644 (S.D. Cal. 2011) (approving BHO’s hourly rates); *Blessing v. Sirius XM Radio, Inc.*, No. 09 CV 10035 (HB), 2011 U.S. Dist. LEXIS 94723, at *17 (S.D.N.Y. Aug. 24, 2011) (approving fee award as “reasonable under both the lodestar and percentage method of calculation”).

11. Further, based on my knowledge of the class action plaintiff’s bar nationwide, the rates charged by my firm are in line with the rates charged by other firms that handle class actions of similar size and complexity. Each of the BHO attorneys have practiced for the following number of years: Mr. Blood – 30 years; Ms. Hurst – 25 years; Mr. O’Reardon – 14 years; Ms. MacPherson – 21 years; Mr. Straub – 13 years; Mr. Yarmolinet – 9 years. The billing surveys demonstrate that based on the years of experience of each of the BHO attorneys, the hourly rates of \$415.00 to \$810.00 are reasonable.

12. The total number of hours spent on this Litigation by my firm as of January 23, 2020, was 1,488.75 hours. The total lodestar for attorney and paralegal time is \$854,091.25.

Attorney/Paralegal	Hours	Rate	Lodestar	Bar Admission
Timothy G. Blood (Partner)	360.5	\$810	\$292,005.00	1990
Leslie E. Hurst (Partner)	309.25	\$660	\$204,105.00	1995
Thomas J. O’Reardon II (Partner)	145.75	\$560	\$81,900.00	2006
Jennifer MacPherson (Of Counsel)	36.75	\$435	\$15,986.25	1999
Craig W. Straub (Associate)	40.5	\$425	\$17,212.50	2007
Aleksandr J. Yarmolinet (Associate)	563.5	\$415	\$233,852.50	2011
Dafne Maytorena (Paralegal)	32.25	\$280	\$9,030.00	n/a
Totals	1,488.75		\$854,091.25	

13. The hours and lodestar incurred by my firm will increase because my firm, along with other Co-Lead Class Counsel, is responsible for any further briefing in this case and in particular responding to objectors, obtaining any needed discovery or deposition testimony from objectors, attending the final approval hearing, and the significant post hearing work, which includes years of claims administration and settlement implementation. If appeals are filed, Co-Lead Class Counsel will handle the appeals. On an ongoing basis, my firm will continue to be in regular contact with Class Members who contact us regarding the Settlement and its claims process, as well as the Settlement Administrator regarding the same, and will continue to oversee the inspection and repair/replacement programs, the claim process and will continue to regularly review and act on the reports provided by the Settlement Administrator, as well as address any issues as they arise. However, no additional fees will be paid for this work.

14. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in my firm's billing rates.

15. As detailed below, my firm has incurred a total of \$29,41886 in unreimbursed expenses in connection with the prosecution of the Litigation from inception through January 23, 2020. The expenses incurred in the Litigation are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred.

16. I believe the out-of-pocket litigation expenses incurred by BHO are reasonable in amount and were necessary for the effective and efficient prosecution of the Litigation. In addition, I believe the expenses are of a type that would normally be charged to a fee-paying client in the private legal marketplace and have been charged by my firm to fee-paying clients. They are also the categories of expenses that have been awarded to my firm and other plaintiff's counsel in other class action settlements, including in the following cases: *Warner v. Toyota Motor Sales, U.S.A., Inc.*, No. CV 15-2171 FMO (FFMx) (C.D. Cal. 2017); *Murr v. Capital One Bank (USA), N.A.*, No. 1:13-cv-01091-LMB-TCB (E.D. Va. 2015); *In re: Hydroxycut Mktg. and*

Sales Prac. Litig., MDL No. 2086 (S.D. Cal. 2014); *Johnson v. Gen. Mills, Inc.*, No. 10-cv-00061 (C.D. Cal. 2013); *Grabowski v. Skechers U.S.A., Inc.*, No. 12-cv-00204 (W.D. Ky. 2013); *Schwartz v. Reebok Int'l Ltd.*, No. 10-cv-12018 (D. Mass. 2012); *Nelson v. Mead Johnson & Co., LLC*, No. 09-cv-61625 (S.D. Fla. 2012); and *Gemelas v. The Dannon Co., Inc.*, No. 08-cv-00236 (N.D. Ohio 2011); *Serochi v. Bosa*, No. 2009-00096686 (S.D. Super. Ct. 2014); *Hartless v. Clorox Co.*, No. 06-cv-02705 (S.D. Cal. 2011).

17. My firm's out-of-pocket litigation expenses total \$29,418.86 as summarized below:

Expense Category	Total
Conference Calls	\$130.79
Copying/Printing	\$1,582.00
Document Management / ESI Services	\$840.75
Expert Fees	\$14,543.76
Filing/Court Fees	\$238.00
LexisNexis / PACER	\$382.17
Postage	\$1,037.18
Travel, Hotels & Meals	\$2,639.13
TOTAL	\$29,418.86

18. The following is additional information regarding these expenses:

(a) Conference Calls: \$127.26. These conference call charges were incurred to host conference calls with Nissan's attorneys, co-counsel, and putative Class Members. The conference call phone charges are allocated to each case by punching in a case code after accessing the conference call number. The case code is mandatory to host a conference call. At the end of each billing period, the conference call charges for each case are entered into our billing system.

(b) In-House Photocopying/Printing: \$1,582.00. The copy and printing costs were incurred in connection with providing plaintiffs with hard-copies of filings and other papers, in-house copies used for internal analysis and review of Nissan's documents, preparation

for mediation and settlement negotiations, and printing case law and research materials when necessary. To the extent possible to help minimize copy expenses we served and provided documents by electronic means. Each time our copy machine is used, our billing system requires that a case code be entered. For each page copied or printed, my firm charges 35 cents. This is the rate charged to all clients, including non-contingency clients. The rate is determined by calculating the approximate cost to my firm per page, without any mark-up. The calculation includes the monthly copy machine rental, the price-per-page charged by our vendor and paper and toner costs, which are not included in the price-per-page cost. The average is approximate because it varies each month depending upon the number of photocopies made for a particular month and the number of color copies, but 35 cents is an accurate approximate average over time.

(c) Document Management/ESI Services: \$840.75. This amount was paid to an e-discovery specialist, Epiq eDiscovery Solutions, Inc., for processing of data, monthly hosting, storage, and management of documents produced in the action in response to discovery requests. Given the amount of documents produced by Nissan, it was necessary for my firm to be able to search, review, code, and organize these documents on the secure, Internet-based electronic database hosted by Epiq. The Relativity platform hosted by Epiq is a standard ESI software tool used in complex litigation involving large data productions.

(d) Expert Fees: \$14,543.76. We retained Lee M. Bowron, ACAS, MAAA, an actuary who specializes in pricing and valuing extended service contracts and warranty extensions. With information provided to him by Plaintiffs' counsel, Mr. Bowron estimated the minimum retail value to the Class of the extended warranty and reimbursement coverage for this Settlement.

(e) Filing/Court Fees: \$238.00. This includes the filing and attorney admission fees required by courts in the Litigation.

(f) Online Research: \$382.17. This was paid to LexisNexis for legal research and to the Administrative Office of the United States Courts for PACER research of federal court

filings. Lexis is used to obtain access to legal research databases, factual databases, and for cite-checking of briefs. The expense amount detailed herein represents the out-of-pocket costs incurred by my firm in connection with use of these services in connection with this Litigation. My firm has a flat-rate contract with Lexis for use of its services. When my firm utilizes Lexis services, a billing code is entered for the specific case being researched. At the end of each billing period in which a service is used, BHO's costs for such services are allocated to specific cases based on the percentage of use in connection with that specific case in the billing period. As a result of the contract negotiated by my firm, the Class enjoys substantial savings in comparison with the "market rate" for *a la carte* use of online legal research services, which some law firms pass on to their clients.

(g) Postage / FedEx / Messenger: \$1,037.18. Postage fees were incurred in mailing information and correspondence to Plaintiffs, Altima purchasers, the mediator and experts/consultants.

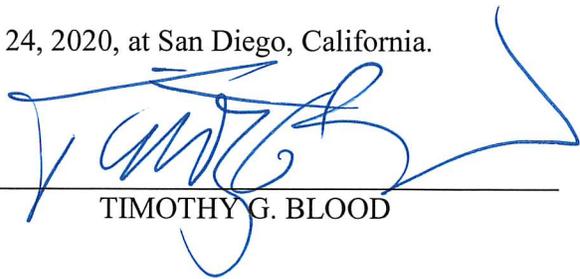
(h) Travel, Hotels & Meals: \$2,639.13. These out-of-town travel costs are in connection with traveling from San Diego, California to Atlanta, Georgia to participate in a full day mediation with Nissan with the highly experienced mediator, Hunter R. Hughes. The traveling attorneys were Timothy G. Blood and Aleksandr J. Yarmolinet. It also includes travel to Nashville, Tennessee to obtain information from the Nissan engineer. The traveling attorney was Mr. Yarmolinet.

19. Nissan has agreed not to oppose applications for Attorneys' Fees and Expenses of up to \$5,900,000 incurred in the Litigation. As reflected in the declarations of Class Counsel, through January 23, 2020, Class Counsel collectively report spending over 5,096 hours for a total lodestar of \$3,011,593.25 and collectively report incurring \$69,505.15 in out-of-pocket expenses in litigating the Lawsuits. This means Class Counsel's reported lodestar alone (not considering time spent by the four firms that comprise "Other Plaintiffs' Counsel") is just 1.3 percent of the value of the warranty extension and reimbursement benefits alone and results in a modest multiplier of 1.9.

20. Nissan also agreed to pay incentive awards of \$5,000 to each of the nineteen Plaintiffs named in the Lawsuits. SA, ¶ 115. These will be paid separately from the settlement consideration for class members and will not reduce Settlement benefits to Class Members. *Id.* The amounts were also negotiated after the principle terms of the class settlement benefits were negotiated. These amounts are based on time and efforts Plaintiffs expended and their commitment to the Lawsuits. Each of the Plaintiffs stepped forward to file the various lawsuits and represent other Altima purchasers knowing that they could be subject to discovery, that the litigation could take years, that they were obligated to testify at trial, and that, in the end, their efforts might not be successful. Nonetheless, the Plaintiffs were willing to and did do everything required and without them these cases would not have been brought and the settlement obtained. Plaintiff Christopher Gann, for instance, communicated extensively with attorneys at my firm regarding all aspects of the Lawsuits, including via phone and email. Mr. Gann provided valuable information necessary for drafting the initial complaint and amended complaints. He was willing to produce his vehicle for inspection and testing by Nissan. He spent time reviewing court filings, and consulting for mediation and settlement. Similar efforts were spent by Plaintiffs Leandre Bishop, Kevin Burke, Elisa Cabebe, Israel Chia, Krista Costa, Hillary Dick, Jura Gerald, Seiji Siler-Hyatte, Jeanine Ingrassia, Arnika Ireland, Montell Jones, Michael Kanzler, Alexandra McCullough, Terese Miranda, Autumn Pierce, Robert H. Weinberg, Lashandrika Williams, and Laura Windom, based on information provided to me by Plaintiffs' counsel and based on my knowledge of the work and contributions made by the Plaintiffs in the Lawsuits. The modest service awards are fair and reasonable.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 24, 2020, at San Diego, California.

By:



TIMOTHY G. BLOOD

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2020, a copy of the foregoing was filed electronically with the Clerk of the court for the United States District Court for the Middle District of Tennessee using the CM/ECF filing system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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s/ Timothy G. Blood

Timothy G. Blood

EXHIBIT A



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FIRM RESUME

Blood Hurst & O'Reardon, LLP focuses in the nationwide prosecution of complex class actions. The firm represents the interests of consumers, insurance policy holders and investors in state and federal trial and appellate courts throughout the country. The principals of Blood Hurst & O'Reardon come from a large firm that represented plaintiffs in class action litigation, where they formed the core of the consumer and insurance practice group. Blood Hurst & O'Reardon's principals have been appointed lead counsel and have held other leadership positions in a wide variety of class action matters.

Timothy G. Blood

Mr. Blood is the firm's managing partner. His practice has focused on complex litigation, including class action litigation, since the early 1990's. Mr. Blood has tried class action cases and is highly regarded in the field of consumer protection law, including California's Unfair Competition Law and Consumers Legal Remedies Act.

Mr. Blood has represented millions of retail consumers, holders of life, automobile and homeowner insurance policies, data breach victims, mortgagors, credit card customers, homeowners, and victims of race discrimination. He practices in both state and federal courts throughout the country and has represented the interests of consumers formally or informally before the Federal Trade Commission, the U.S. Consumer Products Safety Administration, the California Department of Justice, the California Legislative Analyst's Office and the California Department of Insurance. He has worked with the Federal Trade Commission to obtain record setting recoveries for consumers. In *In re Skechers Toning Shoes Prods. Liab. Litig.* (W.D. Ky.), Mr. Blood's work with the Federal Trade Commission resulted in the largest consumer recovery in a false advertising action in FTC history. Other large and record-setting recoveries for consumers include a \$3.4 billion settlement in 2017 for owners of certain Toyota vehicles and the largest false advertising recovery in the history of the food industry.

Since 2010, some of Mr. Blood's court-appointed leadership positions include: Court appointed lead counsel in *Warner v. Toyota Motor Sales* (C.D. Cal); Federal Rule of Civil Procedure 23(g) counsel in *In re: Johnson & Johnson Talcum Powder Prods. Mktg., Sales Practices, and Prods. Liability Litig.* (D.N.J.); Federal Rule of Civil Procedure 23(g) counsel in *Yamagata v. Reckitt Benckiser* (N.D. Cal.); Federal Rule of Civil Procedure 23(g) counsel in *Mullins v. Premier Nutrition Corp.* (N.D. Cal.); Federal Rule of Civil Procedure 23(g) Class Counsel in *Corvello v. Wells Fargo Bank, N.A.* (N.D. Cal.); Executive Committee member in *Snyder v. the Regents of the University of California*, JCCP No. 589243 (Cal. Super. Ct., Los Angeles Cnty., Hon. John Shepard Wiley, Jr.); Federal Rule of Civil Procedure 23(g) Class Counsel in *Rikos v. The Procter & Gamble Co.*, (S.D. Ohio); Federal Rule of Civil Procedure 23(g) Class Counsel in *Godec v. Bayer Corp.* (N.D. Ohio); Federal Rule of Civil Procedure 23(g) Class Counsel in *Johns v. Bayer Corp.* (S.D. Cal.); Federal Rule of Civil Procedure 23(g) Class Counsel in *In re Skechers Toning Shoes Prods. Liab. Litig.* (W.D. Ky.); Plaintiffs' Liaison Counsel and Steering Committee member by the United States District Court for the Southern District of California in the multidistrict litigation *In re Sony Gaming Networks and Customer Data Sec. Breach Litig.*; Class Counsel by the district court for the District of Massachusetts in *In re Reebok Easytone Litig.*; Class Counsel in *Serochi v. Bosa Dev. Cal.* by the San Diego Superior Court; Co-Lead Class Counsel by the Los Angeles Superior Court in *In re Toyota*

Motor Cases, (Toyota Unintended Acceleration Consolidated Litigation); Co-Lead Class Counsel by the United States District Court for the Southern District of California in the multidistrict litigation *In re Hydroxycut Mktg. and Sales Practices Litig.*; Co-Lead Class Counsel by the United States District Court for the Central District of California in *Johnson v. Gen. Mills, Inc.*; Co-Lead Class Counsel by the United States District Court for the Northern District of Ohio in *Gemeles v. The Dannon Co.*; Co-Lead Class Counsel by the United States District Court for the Southern District of California in *Hartless v. Clorox Co.*; and Class Counsel by the United States District Court for the Southern District of Florida in *Smith v. Wm. Wrigley, Jr. Co.*

Mr. Blood has litigated many data breach privacy actions, including leading as Co-Liaison Counsel and member of the Plaintiff's Steering Committee *In re Sony Gaming Networks and Customer Data Security Breach Litigation*, MDL 2258 (S.D. Cal.), one of the largest data breach cases at the time. He represents the City of San Diego in *People for Experian Data Corp.* Case No. 37-2019-01047183 (Cal. Super. Ct., Orange Cnty) in data breach notification action on behalf of the People of the State of California against a leading consumer credit reporting and data aggregation company and represented plaintiffs in *Patton v. Experian Data Corp.*, No. SACV 15-1871 JVS (C.D. Cal.), a multi-state data breach notification action arising out of the same conduct. Mr. Blood is a member of the Plaintiff's Executive Committee in *Snyder v. the Regents of the University of California*, JCCP No. 589243 (Cal. Super. Ct., Los Angeles Cnty), among others.

Mr. Blood has also drafted legislation aimed at modernizing data breach and related privacy laws, including drafting portions of, lobbying for and testifying before both houses of the California Legislature in support of the landmark California Consumer Privacy Act of 2018. The CCPA passed unanimously through both houses of the California legislature and provides the most sweeping digital privacy protection in the United States. It is a model for other proposed state and federal laws.

Mr. Blood has acted as lead counsel in a number of "functional food" false advertising class actions, including cases against General Mills and The Dannon Company filed in federal courts around the country. The *Dannon* litigation resulted in the largest settlement in food industry history for false advertising.

He was lead trial counsel in *Lebrilla v. Farmers Ins. Grp., Inc.* (Cal. Super. Ct., Orange Cnty.) a multistate class action which settled on terms favorable to the class after a month long trial and just before closing arguments. He was also co-lead trial counsel in *In re Red Light Photo Enf't Cases* (Cal. Super. Ct. San Diego Cnty.), an action brought on behalf of California motorists.

Mr. Blood has represented millions of purchasers of food, food supplements and over-the-counter drugs arising out of various advertising claims made by manufacturers and retailers. He has also represented owners of motor vehicles in product liability cases and consumer credit and mortgage borrowers against a number of major lending institutions, including Bank of America, Washington Mutual, Countrywide, GMAC and Wells Fargo.

Mr. Blood has wide-ranging experience litigating against life, auto and other insurance carriers on behalf of consumers. His experience litigating against life insurance companies includes representing owners, holders and beneficiaries of industrial life insurance in race discrimination cases (with class periods dating back to the late 1800's). He also represented those holding traditional life insurance policies in market conduct actions such as the "vanishing premium" life insurance actions. Mr. Blood was responsible for one of only two litigated cases where classes were certified in the vanishing premium series of cases. He was one of the few plaintiffs' attorneys to obtain class-wide recoveries in the "imitation parts" automobile insurance actions. Insurance companies against whom Mr. Blood has litigated include the American General companies, Farmers Insurance Group of companies, Mercury Insurance Group, Allstate, State Farm, Great Southern Life, Metropolitan Life, United Life Insurance Company, Midland National Life Insurance Company and General American Insurance Company.

Mr. Blood has also represented consumers in traditional false advertising actions, those victimized by so-called "negative option" sales practices, and owners of a variety of different types of faulty computer equipment and software from manufacturers. Some of these retailers and manufacturers include Apple, Dell, IBM, Procter & Gamble, General Mills, The Dannon Company, Bayer, AG, Bosa Development, Kellogg Company and General Dynamics.

Mr. Blood has been involved in many precedent-setting appellate decisions in areas which include consumer and insurance law and class action procedure. These appellate decisions include: *Kuhns v. Scottrade, Inc.*, 868 F.3d 711 (8th Cir. 2017) (first 8th Circuit decision finding Article III standing in a data breach case); *Rikos v. The Procter & Gamble Co.*, 799 F.3d 497 (6th Cir. 2015) (class certification) *cert. denied*, 2016 U.S. LEXIS 2244 (U.S. Mar. 28, 2016); *Corvello v. Wells Fargo Bank, NA*, 728 F.3d 878 (9th Cir. 2013) (consumer protection and banking); *Fitzpatrick v. Gen. Mills, Inc.*, 635 F.3d 1279 (11th Cir. 2011) (class certification, consumer law and false advertising); *Westwood Apex v. Contreras*, 644 F.3d 799 (9th Cir. 2011) (CAFA jurisdiction); *Kwikset Corp. v. Super. Ct. (Benson)*, 51 Cal. 4th 310 (2011) (consumer law and false advertising); *Martinez v. Wells Fargo Home Mortg., Inc.*, 598 F.3d 549 (9th Cir. 2010) (banking and preemption); *Troyk v. Farmers Grp., Inc.*, 171 Cal. App. 4th 1305 (2009) (insurance law); *Haw. Med. Ass'n v. Haw. Med. Serv. Ass'n*, 148 P.3d 1179 (Haw. 2006) (health insurance); *McKell v. Wash. Mut. Bank, Inc.*, 142 Cal. App. 4th 1457 (2006) (banking law and consumer law); *Santiago v. GMAC Mortg. Grp., Inc.*, 417 F.3d 384 (3d Cir. 2005) (consumer and banking law); *Lebrilla v. Farmers Grp., Inc.*, 119 Cal. App. 4th 1070 (2004) (automobile insurance and class action procedure); *Moore v. Liberty Nat'l Life Ins. Co.*, 267 F.3d 1209 (11th Cir. 2001), *cert. denied*, 535 U.S. 1018 (2002) (life insurance and civil rights); *Kruse v. Wells Fargo Home Mortg., Inc.*, 383 F.3d 49 (2d Cir. 2004) (consumer and banking law); and *Lavie v. Procter & Gamble Co.*, 105 Cal. App. 4th 496 (2003) (consumer law and false advertising).

Mr. Blood has testified before the California State Assembly and State Senate Judiciary Committees, as well as the Assembly and Senate Committees on Banking, Finance & Insurance. He has worked at both the state and federal level with lawmakers and government agencies to shape legislation to protect consumer rights, including lobbying on the Class Action Fairness Act of 2005 and working to defeat a California state ballot initiative designed to weaken the class action device.

Mr. Blood is a frequent continuing legal education speaker on topics which include complex litigation, class action procedure, data breach and privacy litigation, consumer fraud, false advertising, financial fraud litigation and insurance litigation. He has been an invited speaker for American Bar Association practice groups, the Practising Law Institute, University of California at Irvine School of Law; University of San Diego School of Law, University of Arizona Sandra Day O'Connor School of Law, Loyola Law School, Chapman University School of Law; the Grocery Manufacturers Association, the American Association of Justice, Consumer Attorneys of California, ALI-ABA, the Practising Law Institute, Bridgeport Continuing Education, Law Seminars International, and the Consumer Attorneys of San Diego, for which he has chaired multi-day seminars on class action litigation.

Mr. Blood is frequently consulted by the media. He has appeared on Good Morning America, ABC World News Tonight, and major network affiliates on behalf of his clients. He has been interviewed for stories featuring consumer rights issues and his cases by *The New York Times*, *The Wall Street Journal*, *Bloomberg*, Reuters, the Associated Press, *The Los Angeles Times*, National Public Radio, the *Daily Journal*, *Adweek*, the *Los Angeles Daily News*, CNBC, Fox News, the Korean Broadcasting Service and others.

Mr. Blood is a member of the Board of Directors of the Consumer Attorneys of California and a member of its executive board from 2014 to 2016. He was the 2015 President of the Consumer Attorneys of San Diego and a member of the CASD Foundation, a charitable giving non-profit. In 2018 he received the statewide Marvin E. Lewis Award by the Consumer Attorneys of California for his "guidance, loyalty and dedication, all of which have been an inspiration to fellow attorneys." He also was awarded the 2018 Consumer Advocate of the Year by Consumer Attorneys of San Diego. In 2007, he was a finalist for the Consumer Attorneys of California Lawyer of the Year award for his trial work in a multistate class action against Farmers Insurance. He has been named a "Super Lawyer" since 2006 and has achieved an "AV" rating by Martindale Hubbell. In 2014, Mr. Blood was named a "Titan of the Plaintiff's Bar" by the national legal publication Law360. Mr. Blood was elected a Fellow of the American Bar Foundation. Mr. Blood is also the Legislative Column Editor for *Trial Bar News*. Mr. Blood is also a founding member of the San Diego ESI Forum, a group of judges and lawyers devoted to teaching legal professionals in federal and state court about electronic discovery.

Mr. Blood was a founding partner of the firm now known as Robbins Geller Rudman & Dowd, LLP.

Mr. Blood is admitted to practice in the state of California, as well as the U.S Supreme Court, the United States Courts of Appeal for the Second, Third, Fifth, Sixth, Seventh, Eighth, Ninth and Eleventh Circuits, and the United States District Courts for the Northern, Eastern, Central and Southern Districts of California, the Eastern and Western Districts of Arkansas, the Northern District of Illinois, and the Eastern District of Michigan. Before starting Blood Hurst & O'Reardon, Mr. Blood was a partner in Milberg Weiss Bershad Hynes & Lerach, LLP and a founding partner in the firm now known as Robbins Geller Rudman & Dowd, LLP. Mr. Blood received his Juris Doctor from George Washington University in 1990 and his Bachelor of Arts with honors in Economics from Hobart College in 1987.

Leslie E. Hurst

Ms. Hurst is a co-founding partner of the firm. Prior to founding the firm, Ms. Hurst was a partner in Coughlin Stoia Geller Rudman & Robbins, LLP and an associate at Milberg Weiss Bershad Hynes & Lerach, LLP.

Her practice has focused on complex class action lawsuits, including federal multi-district litigation and California Judicial Council Coordinated Proceedings, with an emphasis on consumer fraud, false advertising, and insurance cases under California's consumer protection statutes.

Ms. Hurst works in a number of practice areas, including areas focusing on cases against: (1) life insurers for misrepresenting the terms of vanishing premium life insurance; (2) auto insurers for repairs with non-OEM parts, diminished value claims, improper collection of installment service charges and breach of contract, and against auto manufacturers for sale of defective vehicles; (3) financial institutions for a variety of conduct; (4) insurance companies for race-based discrimination in the sale of small value "industrial" or "burial" insurance policies; (5) consumer goods manufacturers for false and deceptive advertising; (6) real estate developers for fraud and false advertising; and (7) improper collection and over collection of fees from residents by the City of Los Angeles.

The most recent settlements on which Ms. Hurst was instrumental include: *Adlouni v. UCLA Health Systems* (Cal. Super. Ct., Los Angeles Cnty.) (over \$25 million in free identity theft insurance in data breach case); *Austin v. Western Concrete* (S.D. Cal.) (backpay in employment case); *Serochi v. Bosa Dev.* (Cal. Super. Ct., San Diego Cnty.) (\$16.75 million settlement to condominium purchasers for square footage misrepresentations by the developer); *Chakhalyan v. City of Los Angeles* (Cal. Super. Ct., Los Angeles Cnty.) (full refunds of overcharges and a revamping of L.A. billing practices); *Hartless v. Clorox Co.* (S.D. Cal.) (nationwide settlement in excess of \$10 million that provided 100% recovery of damages to class members); *In re Enfamil LIPIL Mktg. & Sales Practices Litig.* (S.D. Fla.) (nationwide settlement in excess of \$8 million involving false advertising of infant formula); *In re Skechers Toning Shoes Prods. Liab. Litig.* (W.D. Ky.) (nationwide settlement of \$45 million); *Weight v. The Active Network, Inc.* (Cal. Super. Ct., San Diego Cnty.) (full refunds plus a multiplier); *Bransford v. City of Los Angeles* (Cal. Super. Ct., Los Angeles Cnty.) (full refunds); *Warner v. Toyota Motor Sales, U.S.A., Inc.* (C.D. Cal.) (warranty extensions, refunds and free vehicle inspections).

Ms. Hurst is also instrumental in the firm's appellate practice. She has argued before the Second, Eighth and Ninth Circuit Courts of Appeal and before California and Missouri Courts of Appeal. She obtained reversals of the trial courts in *Sonner v. Schwabe International* (9th Cir.); in *Corvello v. Wells Fargo Bank, NA* (9th Cir.), in *Goodman v. Wells Fargo Bank, NA* (Cal. 2d DCA), and in *Guerra v. San Diego Gas & Elec.* (Cal. 4th DCA). Ms. Hurst also briefs most of the firm's appeals including *Rikos v. The Procter & Gamble Co.* (6th Cir.); *In re Enfamil LIPIL Mktg. & Sales Practices Litig.* (11th Cir.); *Hartless v. Clorox Co.* (9th Cir.); *Garcia v. Sony Comput. Entm't* (9th Cir.); *Gutierrez v. Wells Fargo Bank, N.A.* (9th Cir.), various SLUSA appeals in the 2nd, 8th and 9th Circuits, and *Sonner v. Schwabe International* (9th Cir.); *Sonner*

v. Premier Nutrition Corporation (9th Cir.); *Heier v. Fire Ins. Exchange* (Cal. 2nd DCA); *Reed v. Dynamic Pet Products* (Mo. Ct. App.).

Between 2003 and 2005, Ms. Hurst took a sabbatical from law and moved to Sri Lanka where she worked for CARE International as the Coordinator for Strategic Planning with an emphasis on development of CARE's long-term strategic plan for the conflict-affected areas.

Ms. Hurst is admitted to practice in the state of California, as well as the United States Courts of Appeal for the Second, Sixth, Seventh, Eighth and Ninth Circuits, and the United States District Courts for the Northern, Eastern, Central and Southern Districts of California. Ms. Hurst received her Juris Doctor degree from the University of California, Hastings College of the Law in 1995. She earned her Master of Arts degree in Sociology from the University of California, Berkeley and a Bachelor of Arts degree in Sociology (*cum laude*) from the University of San Diego. Ms. Hurst is an active member of the Consumer Attorneys of San Diego, and Consumer Attorneys of California.

Thomas J. O'Reardon II

Mr. O'Reardon is a co-founding partner of the firm. His practice focuses exclusively on complex class action lawsuits involving consumer fraud, insurance fraud and antitrust violations. Mr. O'Reardon received his Juris Doctor degree from the University of San Diego School of Law and his Bachelor of Arts degree in Politics from Wake Forest University. He is admitted to practice in the state of California, as well as the United States Courts of Appeal for the Sixth, Eighth and Ninth Circuits, and the United States District Courts for the Northern, Eastern, Central and Southern Districts of California and the Northern District of Illinois.

Prior to founding the firm, Mr. O'Reardon was an associate at Coughlin Stoia Geller Rudman & Robbins, LLP. There, Mr. O'Reardon worked on numerous complex class action litigation matters, including actions involving: annuity policies marketed and sold to senior citizens; insurer kickbacks known as "contingent commissions" in the property and casualty insurance brokerage industry; Sherman Act claims against the world's largest manufacturers of random access memory for computers; invasions of credit card holder's rights of privacy; false and deceptive advertising of consumer goods and wireless telephone services; automobile insurers' unlawful practices with respect to installment pay plans; and dangerous and defective products, including recalled children's toys. He was also part of the team representing the California Department of Insurance against five of the largest employee benefit insurance companies for violations relating to their failure to disclose payments of contingent commissions to brokers. As a result of the action, all five defendants agreed to sweeping changes in their disclosure practices.

Some of the actions on which Mr. O'Reardon has worked include: *Yamagata v. Reckitt Benckiser LLC* (N.D. Cal.) (certified class action involving false advertising of Move Free Advanced glucosamine and chondroitin supplement); *Mullins v. Premier Nutrition Corp.* (N.D. Cal.) (certified class action involving false advertising of Joint Juice glucosamine and chondroitin supplement); *Rikos v. The Proctor & Gamble Co.* (S.D. Ohio) (certified class action involving false advertising of P&G's Align probiotic, affirmed by the Sixth Circuit); *In re*

Skechers Toning Shoes Prods. Liab. Litig. (W.D. Ky.) (nationwide settlement of \$45 million involving false advertising of Skechers' Shape-ups toning shoes products); *In re Reebok Easytone Litig.* (D. Mass.) (nationwide settlement of \$25 million involving false advertising of Reebok toning footwear and apparel products); *Murr v. Capital One Bank (USA), N.A.* (E.D. Va.) (nationwide settlement in excess of \$7.3 million involving 0% APR billing practices); *Dolfo v. Bank of Am.* (S.D. Cal.) (certified class action involving mortgage modification banking practices); *Johnson v. Gen. Mills, Inc.* (C.D. Cal.) (certified class action involving false advertising of General Mills' YoPlus yogurt, which resulted in a nationwide settlement of \$8.5 million); *Fitzpatrick v. Gen. Mills, Inc.* (S.D. Fla.) (certified class action reviewed and approved by the Eleventh Circuit); *Johns v. Bayer Corp.* (S.D. Cal.) (certified class action involving false advertising of Bayer's One-A-Day multivitamins); *Godec v. Bayer Corp.* (N.D. Ohio) (certified class action involving false advertising of Bayer's One-A-Day multivitamins, which settled on a classwide basis); *Corvello v. Wells Fargo Bank, NA* (N.D. Cal.) (certified class action involving mortgage modification practices where order granting motion to dismiss was reversed by the Ninth Circuit in a published opinion); *Rosales v. FitFlop USA LLC* (S.D. Cal.) (nationwide settlement of \$5.3 million involving false advertising of toning footwear); *Blessing v. Sirius XM Radio, Inc.* (S.D.N.Y.) (nationwide settlement valued in excess of \$180 million involving monopoly price increases arising out of the merger between Sirius and XM); *In re Dynamic Random Access Memory Antitrust Litig.* (N.D. Cal.) (settlement of more than \$300 million); *In re Mattel, Inc. [Toy Lead Paint Prods. Liab. Litig.]* (C.D. Cal.) (nationwide settlement valued at over \$50 million); *Gemelas v. Dannon Co., Inc.* (N.D. Ohio) (nationwide settlement in excess of \$45 million involving false advertising of Dannon's Activia and DanActive yogurt products); *In re Enfamil LIPIL Mktg. & Sales Practices Litig.* (S.D. Fla.) (certified class action involving false advertising of infant formula, which resulted in nationwide settlement in excess of \$8 million); *Smith v. Wm. Wrigley Jr. Co.* (S.D. Fla.) (nationwide settlement in excess of \$7 million involving false advertising of Wrigley Eclipse chewing gum and mints); *Duffer v. Chattem, Inc.* (S.D. Cal.) (nationwide settlement of up to \$1.8 million involving false advertising of ACT Total Care mouthwash); *In re Enron Corp. Sec. Litig.* (S.D. Tex.) (settlements of \$7.3 billion); *AOL Time Warner Cases* (Cal. Super. Ct., Los Angeles Cnty.) (settlements of approximately \$630 million); *Morris v. CBS Broad., Inc.* (S.D.N.Y.) (nationwide settlement on behalf of purchasers of asbestos-laden children's toys); *In re Aqua Dots Prods. Liab. Litig.* (N.D. Ill.) (multidistrict litigation on behalf of purchasers of more than 4 million toxic children's toys); *Berry v. Mega Brands, Inc.* (D.N.J.) (litigation on behalf of purchasers of more than 10 million lethal children's toys); *In re Toyota Motor Cases*, (Cal. Super. Ct., Los Angeles Cnty.) (litigation on behalf of consumers who purchased vehicles subject to "sudden unintended acceleration"); and *In re Hydroxycut Mktg. and Sales Practices Litig.* (S.D. Cal.) (multidistrict litigation on behalf of purchasers of unsafe and ineffective weight-loss products, which resulted in a nationwide settlement valued in excess of \$20 million). With the exception of the *Blessing v. Sirius XM Radio, Inc.* litigation, Mr. O'Reardon and/or his firm served as court-appointed Lead or Co-Lead Counsel in each of the above-mentioned class actions. In granting final settlement approval, which included appointing Mr. O'Reardon as Class Counsel, the Court's order in the *Johnson v. Gen. Mills, Inc.* (C.D. Cal.) action states that Mr. O'Reardon is "vastly experienced" in consumer class action litigation.

Mr. O'Reardon is an active member of the Consumer Attorneys of San Diego, the Consumer Attorneys of California, and a founding member of the CAOC Young Lawyers Division. In 2014-2018, Mr. O'Reardon was named a "Super Lawyers Rising Star," a designation provided to less than 2.5 percent of lawyers in California. He has also been a member of, and contributing author for, The Sedona Conference Working Group on Electronic Document Retention and Production. Mr. O'Reardon has been an invited speaker for the University of San Diego School of Law, Consumer Attorneys of California, the Consumer Attorneys of San Diego, and the San Diego ESI Forum on topics which include complex litigation, electronic discovery, and the class action settlement process.

Paula R. Brown

Ms. Brown is a partner with the firm. Her practice focuses on complex class action litigation, including consumer and antitrust cases in federal multi-district litigation and California Judicial Council Coordinated Proceedings. Ms. Brown has tried class action cases and is also involved in the firm's appellate practice.

Ms. Brown received her Juris Doctor degree and graduated *cum laude* from California Western School of Law in 2007 and earned her Bachelor of Arts degree in Political Science from the University of Washington in 2004. While at California Western, Ms. Brown was a member of the *California Western Law Review* and authored *Parent-Child Relationship Trumps Biology: California's Definition of Parent in the Context of Same-Sex Relationships*, 43 Cal. W. L. Rev. 235 (2006). She is admitted to practice in the state of California, as well as the United States Courts of Appeal for the Eighth and Ninth Circuits, and the United States District Courts for the Northern, Eastern, Central and Southern Districts of California and the Northern District of Illinois.

Prior to joining Blood Hurst & O'Reardon, Ms. Brown was an associate at the law firm now known as Robbins, Geller, Rudman & Dowd, LLP. While there, she represented plaintiffs in a number of complex class action litigation matters involving: price-fixing claims against the world's largest aftermarket auto lighting parts manufacturers and distributors; monopoly claims against the largest seller of portable media players; price fixing claims against containerboard manufacturers; race-discrimination claims against mortgage lenders; and false and deceptive practices in the sale of defective children's products and toys.

Some of the actions on which Ms. Brown has worked include: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices, and Products Liability Litigation* (D.N.J.) (nationwide false advertising); *Mullins v. Premier Nutrition Corp.* (N.D. Cal.) (certified class action involving false advertising); *Huntzinger v. Aqua Lung America, Inc. et al.* (S.D. Cal.) (nationwide false advertising); *Medellin v. Ikea U.S. West, Inc.* (Cal Super. Ct., San Diego Cnty.) (consumer protection claims); *Serochi v. Bosa Dev.* (Cal. Super. Ct., San Diego Cnty.) (misrepresentations case); *Dennis v. Kellogg Co.* (nationwide false advertising); *In re Skechers Toning Shoes Prods. Liab. Litig.* (W.D. Ky.) (nationwide false advertising); *In re Reebok Easytone Litig.* (D. Mass.) (nationwide false advertising); *Dremak v. Urban Outfitters, Inc.* (Cal. Super. Ct., Los Angeles Cnty.) (consumer privacy); *In re Sony Gaming Networks and Customer Data Sec. Breach Litig.* (S.D. Cal.) (consumer privacy); *In re Hydroxycut Mkt. and Sales*

Practices Litig. (S.D. Cal.) (false advertising); *In re Apple iPod iTunes Antitrust Litig.* (N.D. Cal.) (monopoly claims); *In re Mattel, Inc. [Toy Lead Paint Prods. Liab. Litig.]* (C.D. Cal.) (nationwide sale of defective product); *In re Aftermarket Auto. Lighting Prods. Antitrust Litig.* (C.D. Cal.) (price fixing); *Payares v. JP Morgan Chase & Co.* (C.D. Cal.); *Salazar v. Greenpoint Mortg.* (N.D. Cal.); *Puella v. Citifinancial* (D. Mass.); *Morris v. CBS Broad., Inc.* (S.D.N.Y.) (defective product); *In re Aqua Dots Prods. Liab. Litig.* (N.D. Ill.) (defective product); and *Berry v. Mega Brands, Inc.* (D.N.J.) (defective product).

Ms. Brown is an active member of the Consumer Attorneys of San Diego, the Consumer Attorneys of California, the American Bar Association, and the American Association for Justice. In 2015, 2016, and 2017, Ms. Brown was named a “Super Lawyers Rising Star,” a designation provided to less than 2.5 percent of lawyers in California. Ms. Brown is a member of the Board of Directors of the Consumer Attorneys of California and is active in the Louis M. Welsh American Inn of Court.

Jennifer L. MacPherson

Ms. MacPherson is of counsel with the firm. Her practice focuses on complex class action litigation. Ms. MacPherson received her Juris Doctor degree from the University of San Diego School of Law in 1997 with a J.D. and an L.L.M in tax and earned her Bachelor of Arts degree in International Business and Marketing from the University of Hawaii in 1994. During law school she was a summer law clerk to the Honorable Walter S. Kirimitsu (Ret.) in the Hawaii Intermediate Court of Appeals and was a research assistant to Professor C. Hugh Friedman author of *California Practice Guide: Corporations*. She is a member of the California Bar and is licensed to practice before the United States District Courts for the Central, Southern and Northern Districts of California.

For over a decade Ms. MacPherson has prosecuted class actions on behalf of consumers, policyholders, investors, employees, and medical practitioners against the nation’s largest retailers and manufacturers of consumer products, insurers of homes and automobiles, banks, and employers for violations of federal and state consumer, antitrust, securities and labor laws. During this time she has actively litigated complex class action litigation matters involving: false and deceptive advertising by one of the nation’s largest retail mall chains for selling gift cards subject to a monthly service fee in violation of state law; truth in lending claims against a national bank for suspending borrower’s home equity lines of credit; breach of contract claims against national lenders for failing to modify borrower’s home loans after successful completion of a trial period plan; product defect claims against the world’s largest manufacturers of laptops and cell phones; RICO claims against the nation’s largest health insurance companies for denying, delaying and reducing payments to health care providers nationwide; privacy claims against national pharmacies for allegedly using prescription information to conduct targeted marketing campaigns on behalf of drug companies; data breach lawsuits against national banks and retailers for failing to properly safeguard consumer’s personal information.

Some of these actions include: *Solomon v. Anthem, Inc.* (S.D. Fla.); *In re Sony VAIO Comput. Notebook Trackpad Litig.* (S.D. Cal.); *Horvath v. LG Elecs. MobileComm U.S.A., Inc.*, (S.D. Cal.); *Kazemi v. Westfield Am., Inc.* (Cal. Super. Ct., Los Angeles Cnty.); *Frost v. LG*

Elecs. Mobilecomm U.S.A., Inc. (Cal. Super. Ct., Los Angeles Cnty.); *Shamrell v. Apple, Inc.* (Cal. Super. Ct., Los Angeles Cnty.).

Craig W. Straub

Mr. Straub is an associate with the firm. Mr. Straub's practice involves prosecuting all types of consumer fraud in complex class action litigation, with a particular focus on false advertising of consumer products as well as complex contract and intellectual property disputes between international corporations. He graduated *magna cum laude* from California Western School of Law and earned his Bachelor of Sciences degree from Texas A&M University. While at California Western School of Law, Mr. Straub received an Academic Merit Scholarship and a Wiley W. Manuel Pro Bono Services Award. Mr. Straub is a registered patent attorney with the United States Patent and Trademark Office. He brings substantial experience in complex litigation including projects at DLA Piper, Bernstein Litowitz Berger & Grossman, LLP, Cooley LLP, and other nationally recognized firms. He has been a member of the California Bar since 2007.

Mr. Straub performed significant work on behalf of Plaintiffs in the following actions: *Warner v. Toyota Motor Sales, U.S.A, Inc.* (C.D. Cal.) (\$3.4 billion settlement for owners of certain Toyota vehicles); *Mullins v. Premier Nutrition Corp.* (N.D. Cal.) (certified class action involving false advertising of Joint Juice glucosamine and chondroitin supplement); *Rikos v. The Proctor & Gamble Co.* (S.D. Ohio) (certified class action involving false advertising of P&G's Align probiotic, affirmed by the Sixth Circuit); *Terry v. JPMorgan Chase Bank, N.A* (S.D. Cal.) (\$4.3 million settlement fund for the Class alleging unfair debt collection practices); *Huntzinger v. Aqua Lung America, Inc. et al.* (S.D. Cal.) (nationwide false advertising); *Yamagata and Pelardis v. Reckitt Benckiser LLC* (N.D. Cal.) (certified class action involving false advertising of glucosamine supplement).

Aleksandr J. Yarmolinets

Mr. Yarmolinets is an associate with the firm. His practice focuses on complex class action litigation, including consumer, securities, and banking-related cases in federal multi-district litigation. Mr. Yarmolinets holds a Master of Laws degree in Securities and Financial Regulation from Georgetown University Law Center, and a juris doctor degree from California Western School of Law, *cum laude*.

Mr. Yarmolinets is a Certified Fraud Examiner and is admitted to practice law in the States of California and New York, as well as the United States Court of Appeals for the Ninth Circuit, the United States Tax Court, and the United States District Courts for the Central and Southern Districts of California. Mr. Yarmolinets also represented clients in FINRA's Arbitration and Mediation program.

Before joining the firm, Mr. Yarmolinets represented clients in complex securities and commercial litigation, structured and advised clients in capital formation and other complex transactions and served as an outside general counsel to numerous companies across various industries, including transportation, manufacturing, and health care.

While at law school, Mr. Yarmolinets was a distinguished advocate and competed in several national, invitation only moot court trial competitions. Before graduating law school, he interned at the Export-Import Bank of the United States, the California Department of Business Oversight, and the San Diego County Airport Authority.