

**UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII**

STEPHEN G. AQUILINA and LUCINA J. AQUILINA, Individually and on Behalf of All Others Similarly Situated; and DONNA J. CORRIGAN and TODD L. CORRIGAN, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S LONDON; LLOYD'S SYNDICATE #2003; LLOYD'S SYNDICATE #318; LLOYD'S SYNDICATE #4020; LLOYD'S SYNDICATE #2121; LLOYD'S SYNDICATE #2007; LLOYD'S SYNDICATE #1183; LLOYD'S SYNDICATE #1729; LLOYD'S SYNDICATE #510; BORISOFF INSURANCE SERVICES, INC. d/b/a MONARCH E&S INSURANCE SERVICES; SPECIALTY PROGRAM GROUP, LLC d/b/a SPG INSURANCE SOLUTIONS, LLC; ALOHA INSURANCE SERVICES, INC.; ILIKEA LLC d/b/a MOA INSURANCE SERVICES HAWAII; and DOES 1-100,

Defendants.

No. 1:18-cv-00496-ACK-KJM

Trial Judge: Alan C. Kay
Hearing Date: March 3, 2022
Trial Date: February 1, 2022
(stayed)

**DECLARATION OF DARYL F. SCOTT IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES, LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, Daryl F. Scott, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm Scott+Scott Attorneys at Law LLP (the “Firm”). I submit this declaration (the “Declaration”) in support of Plaintiffs’ Motion for Attorneys’ Fees, Litigation Expenses, and Service Awards (the “Fee Application”) in the above-captioned action (the “Litigation”).

2. The Firm served as Class Counsel and participated in all aspects of the Litigation, including settlement of the claims. The Firm’s participation is described in Class Counsel’s memorandum of law in support of the Fee Application.

3. The time spent by my Firm in prosecuting the Litigation was taken from daily time records prepared by timekeepers and maintained by my Firm. The expenses were taken from the accounting records (receipts, expense vouchers, check records, and related financial records) prepared by staff and maintained by the Firm in the ordinary course of business.

4. I have reviewed these records and can confirm their accuracy. During my review, I exercised billing discretion and judgment and, if necessary, reduced certain time entries and expense items.

5. I believe the time and expenses for which payment is sought, as set forth in the charts herein below, were reasonable and necessary for the effective prosecution of the Litigation. I also believe the expenses are of a type normally charged to, and paid by, fee-paying clients in the private legal marketplace.

6. The chart that follows shows the hours, hourly rate, and resulting lodestar for each timekeeper who spent time on the Litigation using Scott+Scott’s historical rates:

PROFESSIONAL	STATUS	TOTAL HOURS	HOURLY RATE	TOTAL LODESTAR AT HOURLY RATES
Joseph Guglielmo	P	856.20	\$900	\$ 770,580.00
Erin Green Comite	P	1,732.10	\$825	\$ 1,428,982.50
Alex Outwater	A	519.40	\$725	\$ 376,565.00
Anja Rusi	A	17.00	\$575	\$ 9,775.00
Justin Batten	A	477.30	\$450	\$ 214,785.00
Michelle Conston	A	2,012.50	\$575	\$ 1,157,187.50
Sean Russell	A	37.60	\$400	\$ 15,040.00
J. Alex Vargas	A	25.10	\$625	\$ 15,687.50
Ellen DeWan	PL	29.50	\$325	\$ 9,587.50
Irina Chilaia	PL	14.00	\$305	\$ 4,270.00
Kelly Hogan	PL	222.50	\$395	\$ 87,887.50
Kaitlin Steinberger	PL	208.00	\$325	\$ 67,600.00
Toby Saviano	PL	40.80	\$395	\$ 16,116.00
Mario Tlatenchi	LS	12.40	\$300	\$ 3,720.00
Charlie Torres	LS	97.10	\$300	\$ 29,130.00
TOTAL		6,301.50		\$ 4,206,913.50

The total number of hours is 6,301.50 and the lodestar totals \$4,206,913.50. Lodestar was determined by multiplying hours by the historical billing rates assigned to each timekeeper. The Firm’s lodestar excludes expense items, which are reported herein below.

7. The chart that follows shows the hours, adjusted hourly rate, and resulting lodestar for each timekeeper who spent time on the Litigation. The adjusted hourly rates for each time keeper are based on rates that have been

submitted and approved for attorneys in other complex litigation in Hawaii, including *Martin v. Marriott Int’l, Inc.*, No. 1:18-cv-00494-JAO-RT, ECF No. 169-8 (D. Haw. Aug. 2, 2021), *Smith v. Bank of Hawaii*, No. 1:16-cv-00513-JMS-WRP, ECF No. 217-1 (D. Haw. Apr. 10, 2020), and *Ah Chong v. Bhanot*, No. 1:13-cv-00663-LEK-KSC, ECF No. 390-1 (D. Haw. Mar. 30, 2018).

Name	Status	Total Hours	Adjusted Hawaii Hourly Rate	Total Lodestar
Joseph Guglielmo	P	856.20	\$575	\$ 492,315.00
Erin Green Comite	P	1,732.10	\$500	\$ 866,050.00
Michelle Conston	A	2,012.50	\$375	\$ 754,687.50
Justin Batten	A	477.30	\$300	\$ 143,190.00
Alex Outwater	A	519.40	\$400	\$ 207,760.00
Sean Russell	A	37.60	\$350	\$ 13,160.00
J. Alex Vargas	A	25.10	\$400	\$ 10,040.00
Anja Rusi	A	17.00	\$350	\$ 5,950.00
Irina Chilaia	PL	14.00	\$170	\$ 2,380.00
Ellen DeWan	PL	29.50	\$170	\$ 5,015.00
Kelly Hogan	PL	222.50	\$140	\$ 31,150.00
Kaitlin Steinberger	PL	208.00	\$170	\$ 35,360.00
Toby Saviano	PL	40.80	\$140	\$ 5,712.00
Mario Tlatenchi	LS	12.40	\$140	\$ 1,736.00
Charlie Torres	LS	97.10	\$140	\$ 13,594.00
TOTAL		6,301.50		\$ 2,588,099.50

The total number of hours is 6,301.50 and the lodestar totals \$2,588,099.50. Lodestar was determined by multiplying hours by the adjusted Hawaii billing rates assigned to each timekeeper. The Firm’s lodestar excludes expense items, which are reported next.

8. Litigation expenses for which reimbursement is sought total \$223,839, and are summarized below:

EXPENSE	AMOUNT
Filing, Witness and Other Fees	\$ 4,293.00
Discovery Platform	\$ 42,245.28
Work-Related Transportation, Hotels & Meals	\$ 14,086.99
Long-Distance Telephone, Facsimile & Conference Calling	\$ 347.66
Messenger, Overnight Delivery, Postage	\$ 1,558.06
Litigation Support	\$ 2,479.00
Duplicating - photocopies	\$ 8,285.54
Online Legal and Factual Research	\$ 21,698.65
Local Counsel Time and Expenses Incurred	\$ 6,250.79
Local Counsel Anticipated Future Time and Expenses	\$ 4,250.00
Experts	\$ 78,562.31
Court Reporters/Transcripts	\$ 39,684.81
Staff Overtime	\$ 82.26
Supplies	\$ 14.65
TOTAL	\$ 223,839.00

9. Local Counsel Damon Key Leong Kupchak Hastert, LLC’s (“Damon Key Leong”) fees and expenses are being submitted as a litigation expense, as Scott+Scott paid Damon Key Leong for its invoiced services as local counsel on a monthly basis. Additionally, Damon Key Leong’s estimated fees and expenses for work up until the final approval hearing are being included.

10. Biographical information of the Firm’s attorneys who prosecuted the Litigation is found in Exhibit 1.

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

Executed this 17th day of November, 2021 in Richmond, Virginia.

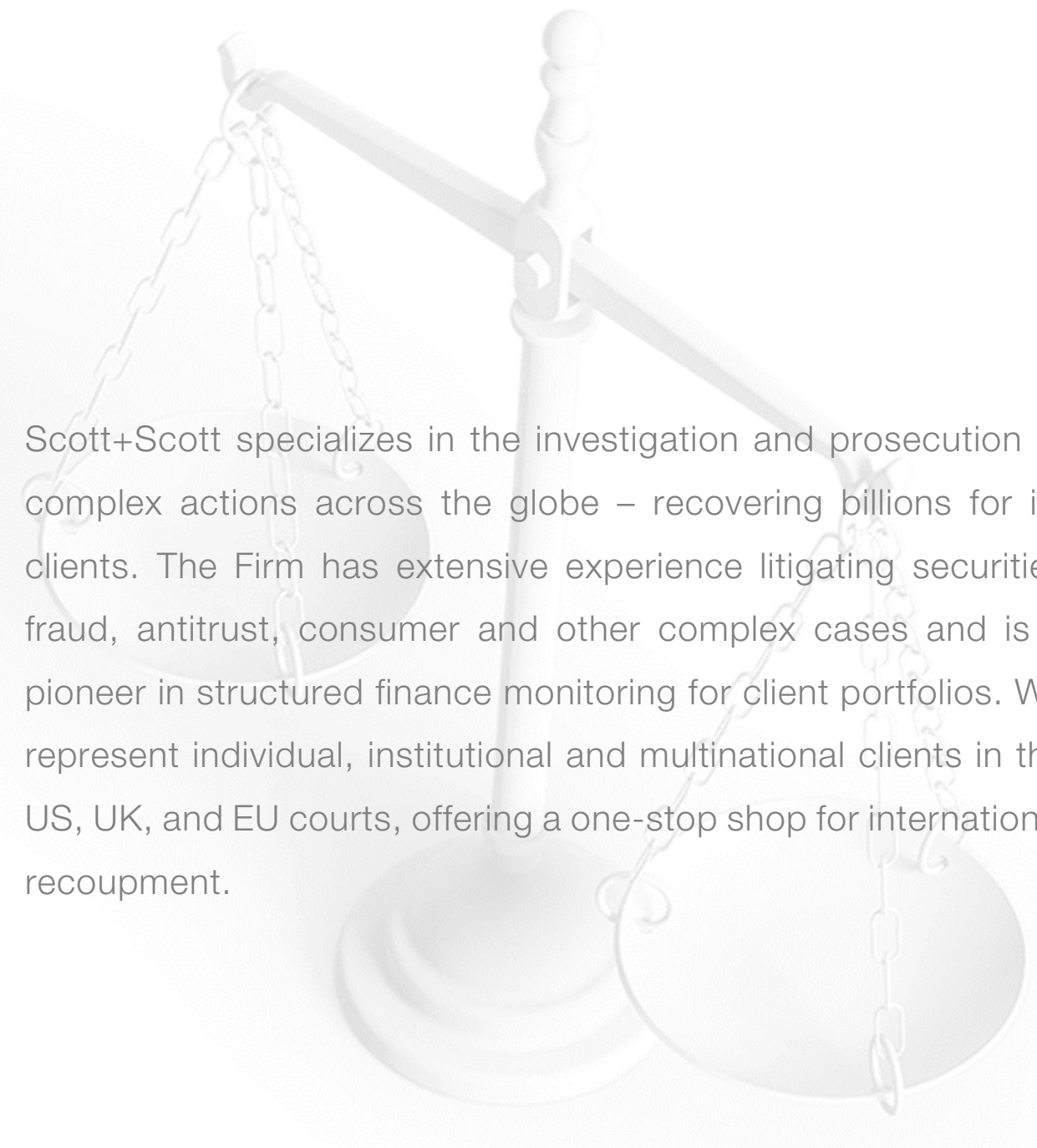


Daryl F. Scott

EXHIBIT 1



FIRM RESUME

A large, faint, white 3D rendering of a pair of scales of justice is centered in the background of the page. The scales are balanced, with both pans hanging at the same level. The central pillar is thick and has a decorative top. The pans are circular and connected to the arms by chains.

Scott+Scott specializes in the investigation and prosecution of complex actions across the globe – recovering billions for its clients. The Firm has extensive experience litigating securities fraud, antitrust, consumer and other complex cases and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional and multinational clients in the US, UK, and EU courts, offering a one-stop shop for international recoupment.



THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected law firm specializing in the investigation and prosecution of complex actions across the United States and in Europe. Today, it is comprised of more than 135 team members, including over 100 highly experienced attorneys, and a 30+ paraprofessional team comprised of paralegals and legal assistants, a finance manager, institutional investor liaisons, and other office support staff, in addition to an IT support and development group, financial analysts, forensic accountants, investment consultants, and an in-house investigations department.

Scott+Scott is headquartered in Connecticut and has additional offices in New York, London, Amsterdam, Berlin, California, Virginia, Ohio, and Arizona.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, serving as lead counsel in numerous securities class actions since the enactment of the Private Securities Litigation Reform Act of 1995 ("PSLRA") and as lead and co-lead counsel in antitrust, consumer, and other complex litigation. The Firm also represents many multinational corporations in foreign jurisdiction litigation in the EU courts.

Scott+Scott's attorneys are recognized experts and leaders in securities monitoring, complex litigation, and corporate governance law. They regularly speak at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives.

The Firm's vast experience in structured debt financial litigation has enabled us to provide clients with in-depth monitoring of their structured finance products. Structured-finance products, like asset-backed securities and collateralized debt obligations, attract investors with high returns relative to other fixed-income instruments. However, those returns can come with substantial undisclosed risks due to investors' limited ability to assess what they are actually acquiring. Most investors cannot review the assets that underlie securitizations, nor negotiate around the boiler-plate terms that govern securitizations, and have very little control over the parties that administer securitizations.

significant recoveries for clients who purchased structured-finance products. The Firm has also evaluated and monitored debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives for our clients.



CONSUMER LITIGATION

Scott+Scott's Consumer Practice Group consists of some of the premier advocates in the area of consumer protection and has been at the forefront in litigating and securing some of the most significant consumer protection settlements on behalf of its clients, resulting in hundreds of millions of dollars to class members. The Firm's Consumer Practice Group has attorneys dedicated to three primary areas: Data Breach/Data Privacy Litigation, Healthcare and Pharmaceutical Litigation, and Consumer Protection Litigation.

DATA BREACH/DATA PRIVACY LITIGATION

Scott+Scott has extensive experience litigating data privacy and data breach class actions advancing cutting-edge legal theories. The Firm has achieved some of the largest recoveries in this area and currently serves in a leadership capacity in a number of data privacy and data breach class actions, including:

- *In re Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-02800 (N.D. Ga.) (claims on behalf of financial institutions injured as a result of the 2017 Equifax data breach that exposed the personal and financial information of approximately 150 million U.S. consumers; preliminary approval of settlement valued at \$32.5 million);
- *In re Google Assistant Privacy Litigation*, No. 5:19-cv-04286 (N.D. Cal.) (class action on behalf of consumers alleging privacy violations whereby Google Assistant records and discloses their private confidential communications without consent);
- *Lopez v. Apple Inc.*, No. 4:19-cv-04577 (N.D. Cal.) (class action on behalf of consumers and their minor children alleging privacy violations by Apple through its Siri application); and
- *In re: American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, No. 2:19-md-02904 (D.N.J.) (claims on behalf of consumers involving data breach of personal information).

Recently, in settling a class action against The Wendy's Co. involving a breach of personal and financial information, the court, in approving the \$50 million dollar settlement, noted that Scott+Scott and its attorneys demonstrated *"very significant experience in these types of class actions and in data breach litigation"* and that the attorneys *"brought to the table an incredible wealth of knowledge, was always prepared, really was thorough and professional in everything that was provided to the Court."* *First Choice Federal Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506, Transcript at 32 (W.D. Pa. Nov. 6, 2019).



Data Breach/Data Privacy REPRESENTATIVE CASES

Additional data privacy and data breach settlements achieved by Scott+Scott for its clients include:

- *The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (co-lead counsel; \$27.25 million settlement on behalf of financial institutions involving data breach and theft of the personal and financial information of over 40 million credit and debit card holders);
- *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) (\$59 million settlement on behalf of financial institutions injured by the theft of sensitive payment card information);
- *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 1:15-cv-02228 (N.D. Ill.) (settlement valued at \$13.4 million on behalf of financial institutions injured by the theft of sensitive payment card information); and
- *WinSouth Credit Union v. Mapco Express, Inc.*, No. 3:14-cv-01573 (M.D. Tenn.) (largest per dollar per card recovery involving payment card data breach brought on behalf of a class of financial institutions).

INSURANCE AND PHARMACEUTICAL LITIGATION

Scott+Scott represents consumers and health and welfare funds throughout the United States who have been overcharged in connection with their insurance and pharmaceutical transactions. The Firm currently serves in a leadership capacity in a number of insurance and pharmaceutical class actions, including:

- *Sohmer v. UnitedHealth Group Inc.*, No. 0:18-cv-03191 (D. Minn.) (co-lead counsel; claims on behalf of plan participants alleging overcharge for prescription drug copayments);
- *Negron v. Cigna Corporation*, No. 3:16-cv-01702 (D. Conn.) (chair of executive committee; claims on behalf of plan participants alleging overcharge for prescription drug copayments);
- *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.) (class action on behalf of consumers and third party union benefit funds alleging unlawful overcharges for medically necessary prescription drugs); and
- *Stafford v. Rite Aid Corporation*, No. 3:17-cv-01340 (S.D. Cal.) (class action on behalf of consumers who were overcharged for prescription drug claims).



Insurance and Pharmaceutical REPRESENTATIVE CASES

Scott+Scott have significant experience litigating against insurance companies and pharmaceutical manufacturers. The Firm's lawyers have obtained some of the largest settlements in consumer healthcare litigation, including:

- *In re Managed Care Litig.*, MDL No. 1334 (S.D. Fla.) (settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint providing monetary and injunctive benefits exceeding \$1 billion); and
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litigation*, MDL No. 2208 (D. Mass.) (\$40 million settlement) was achieved on behalf of a class of military service members and their families who had purchased insurance contracts).

CONSUMER PROTECTION LITIGATION

Scott+Scott has been at the forefront in prosecuting consumer protection actions against organizations engaging in unfair practices. The Firm currently serves in a leadership capacity in a number of consumer protection class actions, including:

- *Aquilina v. Certain Underwriters at Lloyd's London*, No. 1:18-cv-00496 (D. Haw.) (representing Hawaii homeowners who were placed into insurance excluding lava coverage and suffered devastating losses as a result of the 2018 eruption of Kilauea); and
- *Morris v. Apple, Inc.*, No. 5:20-cv-04812 (N.D. Cal.) (class action on behalf of consumers who purchased iTunes gift cards under false pretenses and were not refunded the value of the iTunes gift cards).

Consumer Protection REPRESENTATIVE CASES

Over the past decade, Scott+Scott has litigated a number of diverse cases and fought for rights of consumers to be treated fairly and equitably. The Firm has achieved significant settlements that have protected consumers' rights and recovered substantial monetary benefits, including:

- *The Vulcan Society, Inc. v. The City of New York*, No. 1:07-cv-02067 (E.D.N.Y.) (\$100 million settlement and significant injunctive relief was obtained for a class of black applicants who sought to be New York City firefighters, but were denied or delayed employment due to racial discrimination);



- *In re Providian Financial Corp. Credit Card Terms Litigation*, MDL No. 1301 (E.D. Pa.) (\$105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *In re Pre-Filled Propane Tank Marketing & Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.) (\$37 million settlement obtained on behalf of class of propane purchasers who alleged defendants overcharged the class for under-filled propane tanks);
- *Murr v. Capital One Bank (USA), N.A.*, No. 1:13-cv-01091 (E.D. Va.) (\$7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest credit card offers); and
- *Gunther v. Capital One, N.A.*, No. 2:09-cv-02966 (E.D.N.Y.) (settlement resulting in class members receiving 100% of their damages in case alleging consumers were improperly charged undeliverable mail fees).



ACCOLADES

U.S. News & World Report “Best Law Firms”

The Firm is currently ranked by U.S. News & World Report as a “Best Law Firm” in commercial litigation in the New York region.

American Antitrust Institute

The 2018 Antitrust Annual Report recognized *In re Foreign Currency Benchmark Rates Antitrust Litigation* as the #1 settlement of 2018, as well as ranking the Firm #1 nationally for aggregate settlements: 2013-2018.

Global Competition Review

At the 6th Annual Global Competition Review (“GCR”) Awards, Scott+Scott won for Litigation of the Year – Cartel Prosecution, which recognized the Firm’s efforts in the foreign exchange settlements in the United States, a landmark case in which major banks conspired to manipulate prices paid in the \$5.3 trillion-per-day foreign exchange market and have thus far settled for more than \$2 billion.

Law 360 Glass Ceiling Report

Scott+Scott is recognized as one of the top law firms in the nation for female attorneys by the legal publication Law360. The Glass Ceiling Report honors firms that “are demonstrating that the industry’s gender diversity goals can turn into a measurable result, and boost the number of women at all levels of a law firm.^{1, 2}” This selection highlights the importance Scott+Scott places on diversity and inclusion within the Firm.

Center for Constitutional Rights

Scott+Scott was the recipient of the 2010 Center for Constitutional Rights’ Pro Bono Social Change Award for its representation of the Vulcan Society, an association of African-American firefighters, in challenging the racially discriminatory hiring practices of the New York City Fire Department.

¹ <https://www.law360.com/articles/1310926>

² <https://www.law360.com/articles/1162859/the-best-law-firms-for-female-attorneys>.



WORLD-CLASS ATTORNEYS

We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the UK's CAT and High Courts, and received virtually every accolade offered in our profession.



ADMISSIONS

U.S. Admissions: United States Supreme Court; United States Courts of Appeal for the First, Second, Third, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits; United States District Courts for the Districts of California (Northern, Southern, Eastern, and Central), Colorado, Connecticut, Florida (Northern), Illinois (Northern), Massachusetts, Michigan (Eastern), Missouri (Eastern), New Jersey, New York (Southern, Eastern, and Western), Ohio (Northern and Southern), Pennsylvania (Eastern and Western), Texas (Northern, Western, and Southern), Wisconsin (Eastern and Western), and the District of Columbia; and the courts of the States of Arizona, California, Connecticut, Delaware, Florida, Maryland, Pennsylvania, Massachusetts, Nebraska, New Jersey, New York, Ohio, West Virginia, Wisconsin, Texas, and the District of Columbia.



ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

Managing Partner David R. Scott represents multinational corporations, hedge funds, and institutional investors in high-stakes, complex litigation, including antitrust, commercial, and securities actions.

ADMISSIONS

States of New York, Pennsylvania, and Connecticut; United States Tax Court; United States Courts of Appeal: Second, Third, and Fifth Circuits; United States District Courts: Southern District of New York, Connecticut, Eastern District of Pennsylvania, Northern and Southern Districts of Texas, and Colorado

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989)

St. Lawrence University (B.A., cum laude, 1986)

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott with offices in New York, Amsterdam, London, Berlin, California, Connecticut, Virginia, Arizona and Ohio.

In addition to managing the firm's lawyers worldwide, Mr. Scott advises some of the world's largest multinational corporations in cartel damages and other complex matters. He has been retained to design corporate policies for the global recoupment of losses, and transatlantic private enforcement programs.

He currently represents multinational companies and hedge funds in cases involving, among other things, price-fixing in the trucks, foreign exchange, high voltage power cables, cardboard, and payment card sectors.

Mr. Scott's antitrust cases in the United States have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Capital Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for \$590.5 million. He was lead counsel in *Red Lion Medical Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service



organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has been elected to Who's Who Legal: Competition 2015- 2020, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015. In addition, Mr. Scott is continually recognized in the U.S. by Best Lawyers and Super Lawyers.

In addition to his extensive competition law work, Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds. For example, he has been retained to pursue losses against mortgaged-backed securities trustees for failing to protect investors. He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

Mr. Scott is frequently quoted in the press, including in publications such as The Financial Times, The Economist, The Guardian, The Daily Telegraph, The Wall Street Journal, and Law360. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.

JOSEPH P. GUGLIELMO

PRACTICE EMPHASIS

Joseph P. Guglielmo represents clients in consumer, antitrust and privacy litigation in federal and state courts throughout the United States.

ADMISSIONS

United States Supreme Court; United States Courts of Appeal: First, Second, Third, Sixth, Eighth, Ninth and Eleventh Circuits; United States District Courts: Southern, Eastern and Northern Districts of New York, Districts of Massachusetts, Connecticut, and Colorado, Northern District of Illinois, Eastern District of Wisconsin; States of New York and Massachusetts; District of Columbia

EDUCATION

Catholic University of America (J.D., 1995; B.A., cum laude, 1992; Certificate of Public Policy)



HIGHLIGHTS

Mr. Guglielmo is a partner in the firm's New York office and was recognized for his efforts representing New York University in obtaining a monumental temporary restraining order seeking the recovery of over \$200 million from a Bernard Madoff feeder fund. Specifically, in approving the settlement, New York State Supreme Court Justice Richard B. Lowe III stated, "Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court."

Mr. Guglielmo currently serves in a leadership capacity in a number of complex class actions, including: *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.) (lead counsel, asserting claims on behalf of nationwide class of consumers and third-party payers alleging overcharges for prescription drugs); *Stafford v. Rite Aid Corporation*, 3:18-cv-00152 (S.D. Cal.) (lead counsel, asserting claims that Rite Aid overcharged customers for prescription drugs); *In Re: Disposable Contact Lens Antitrust Litigation*, No. 3:15-md-2626 (M.D. Fla.) (co-lead counsel, settlements obtained in excess of \$45 million on behalf of a class of contact lens purchasers alleging violations of the antitrust laws); *Arkansas Federal Credit Union v. Hudson Bay*, No. 1:19-cv-4492-PKC (S.D.N.Y.) (lead counsel, claims on behalf of financial institutions arising out of data breach);; *Sohmer v. UnitedHealth Group Inc.*, No. 18-cv-03191 (JNE/BRT) (D. Minn.) (co-lead counsel, claims on behalf of ERISA plan participants alleging overcharge for pharmaceutical copayments); *Negron v. Cigna Corporation*, No. 3:16-cv-1702 (WWE) (D. Conn.) (chair of executive committee, claims on behalf of ERISA plan participants involving overcharge of copayments for prescription drugs); *McPherson v. American Bank Systems, Inc.*, 5:20-cv-01307-G (W.D. Okla.) (co-lead counsel, claims involving disclosure of personal and financial information resulting from data breach); *In re Sonic Corp. Customer Data Security Breach Litig.*, 17-ml-2807 (N.D. Ohio) (Plaintiffs' Steering Committee, claims on behalf of financial institutions involving breach of payment card information); and *In re: American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, No. 19-md-2904 (D.N.J.), Plaintiffs' Steering Committee, claims on behalf of consumers involving data breach of personal information.

Mr. Guglielmo was recently a member of the settlement team and signatory of a \$92 million settlement in *In re TikTok, Inc., Consumer Privacy Litigation*, No. 1:20-cv-04699 (N.D. Ill.), involving violations of privacy claims on behalf of consumers. Mr. Guglielmo was also actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789-LGS (S.D.N.Y.), where settlements in excess of \$2 billion have been obtained on behalf of purchasers of foreign exchange instruments who alleged violations of federal antitrust laws.



Throughout Mr. Guglielmo's career, he has achieved significant victories and obtained numerous settlements for his clients, including: In re Equifax, Inc. Customer Data Security Breach Litigation, No. 1:17-md-02800 (N.D. Ga.) (claims on behalf of financial institutions injured as a result of the 2017 Equifax data breach that exposed the personal and financial information of approximately 150 million U.S. consumers, preliminary approval of settlement valued at \$32.5 million); In re The Home Depot, Inc., Customer Data Security Breach Litigation, MDL No. 2583 (N.D. Ga.) (\$27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders); First Choice Federal Credit Union v. The Wendy's Company, No. 16-cv-00506 (W.D. Pa.) (\$50 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 18.5 million credit and debit card holders); In re Target Corporation Customer Data Security Breach Litigation, MDL No. 2522 (D. Minn.) (\$59 million settlement on behalf of financial institutions injured by the theft of sensitive payment card information); Veridian Credit Union v. Eddie Bauer LLC, No. 2:17-CV-00356-JLR (W.D. Wash.) (\$9.8 million settlement on behalf of financial institutions arising out of data breach of payment card information); Winsouth Credit Union v. Mapco Express Inc., No. 3:14-cv-1573 (M.D. Tenn.) (settlement of the largest dollar-per-card recovery on behalf of financial institutions involving data breach of credit and debit card information).

Mr. Guglielmo was one of the principals involved in the litigation and settlement of In re Managed Care Litigation, MDL No. 1334 (S.D. Fla.), which included settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding \$1 billion and played a leading role and obtained substantial recoveries for his clients including Love v. Blue Cross and Blue Shield Ass'n, No. 03-cv-21296 (S.D. Fla.), which resulted in settlements of approximately \$130 million and injunctive benefits valued in excess of \$2 billion; In re Insurance Brokerage Antitrust Litigation, MDL No. 1897 (D.N.J.), settlements in excess of \$180 million; Valle v. Popular Community Bank, No. 653936/2012 (N.Y. Supreme Ct.), \$5.2 million settlement on behalf of consumers, In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation, MDL No. 2086 (W.D. Mo.), consumer settlements in excess of \$40 million; Bassman v. Union Pacific Corp., No. 97-cv-02819 (N.D. Tex.), \$35.5 million securities class action settlement; Garcia v. Carrion, No. CV 11-1801 (D.P.R.), substantial corporate governance reforms; Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates, No. 09-cv-00037 (W.D. Wash.), \$26 million securities class action settlement, Murr v. Capital One Bank (USA), N.A., No. 13-cv-1091 (E.D. Va.), \$7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers, and Howerton v. Cargill, Inc., No. 13-cv-00336 (D. Haw.), \$6.1 million settlement obtained on behalf of class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural." Mr. Guglielmo was the principle litigator and obtained a significant opinion from the Hawaii Supreme Court in Hawaii Medical Association v. Hawaii Medical Service Association, 113



Hawaii 77 (Haw. 2006), reversing the trial court's dismissal and clarifying rights for consumers under the state's unfair competition law.

Mr. Guglielmo lectures on electronic discovery and was a member of the Steering Committee of Working Group 1 of the Sedona Conference®, an organization devoted to providing guidance and information concerning issues such as discovery and production issues, as well as areas focusing on antitrust law, complex litigation, and intellectual property, and a member of the drafting team responsible for the Sedona Principles, Third Edition. Presently, Mr. Guglielmo serves on the board of the Advanced eDiscovery Institute at Georgetown University Law Center. He is a frequent speaker on electronic discovery issues. Mr. Guglielmo was also recognized for his achievements in litigation by his selection to The National Law Journal's "Plaintiffs' Hot List." In 2021, Mr. Guglielmo was recognized by Super Lawyers as a top Antitrust lawyer in the New York metro area, was named by Who's Who in Legal Litigation: Leading Practitioner-E-Discovery (2021). Mr. Guglielmo was also named by Lawdragon in 2021 as one of the 500 Leading Plaintiff Financial Lawyers.

Mr. Guglielmo is also a member of the following associations: District of Columbia Bar Association, New York State Bar Association, and American Bar Association.

ERIN GREEN COMITE

PRACTICE EMPHASIS

Erin Green Comite litigates complex class actions throughout the United States, representing the rights of shareholders, employees, consumers, and other individuals harmed by corporate misrepresentation and malfeasance.

ADMISSIONS

State of Connecticut; United States Courts of Appeal: Second, Third, Ninth, and Eleventh Circuits; United States District Courts: Southern District of New York, District of Connecticut, Northern District of Illinois, Eastern District of Wisconsin, and District of Colorado

EDUCATION

University of Washington School of Law (J.D., 2002); Dartmouth College (B.A., magna cum laude, 1994)



HIGHLIGHTS

Ms. Comite is a partner in the firm's Connecticut office and currently serves in a leadership role in a number of complex class actions including: First Choice Federal Credit Union v. The Wendy's Company, No. 16-cv-00506 (W.D. Pa.), co-lead counsel on behalf of financial institutions arising out of data breach; In re Arby's Restaurant Group, Inc. Litigation, No. 17-mi-55555 (N.D. Ga.), member of Plaintiffs' Executive Committee on behalf of financial institutions arising out of a data breach, In re Equifax, Inc. Customer Data Security Breach Litigation, MDL No. 2800 (N.D. Ga.), chair of law and briefing committee; Forth v. Walgreen Co, Inc., No. 1:17-cv-02246 (N.D. Ill.), co-lead counsel, asserting claims on behalf of class of consumers alleging overcharge for medically necessary, covered prescription drugs; and Aquilina v. Certain Underwriters at Lloyd's London, No. 1:18-cv-00496 (D. Haw.), co-lead counsel, alleging that insurers, brokers, and agents improperly steered insureds into surplus lines insurance.

Recently, Ms. Comite has played a significant role in the prosecution of consumer class cases such as: In re The Home Depot, Inc., Customer Data Security Breach Litigation, MDL No. 2583 (N.D. Ga.) (\$27.25 million settlement) and In re Target Corporation Customer Data Security Breach Litigation, MDL No. 2522 (D. Minn.) (\$59 million settlement), two of the largest data breaches impacting consumer personal data to date; Greater Chautauqua Federal Credit Union v. Kmart Corp., No. 15-cv-02228 (N.D. Ill.), Chair of the Plaintiffs' Steering Committee (\$8.1 million settlement); Morrow v. Ann, Inc., No. 1:16-cv-03340 (S.D.N.Y.) (\$8.1 million settlement); Howerton v. Cargill, Inc., No. 13-cv-00336 (D. Haw.) (\$6.1 settlement); Murr v. Capital One Bank (USA), N.A., No. 13-cv-1091 (E.D. Va.) (\$7.3 million settlement); and In re Nutella Mktg. & Sales Practices Litigation, No. 11-cv-01086 (D.N.J.) (\$2.5 million settlement).

Ms. Comite's appellate victories in consumer class actions include Nunes v. Saks Inc., 2019 WL 2305039 (9th Cir. May 30, 2019); Chavez v. Nestle USA, Inc., 511 F. App'x 606 (9th Cir. 2013) (achieving a reversal of dismissal); and In re Nutella Mktg. & Sales Practices Litigation, 589 F. App'x 53 (3d Cir. 2014) (defending settlement from professional objectors).

Since joining Scott+Scott in 2002, she has litigated such cases as In re Priceline.com Securities Litigation (\$80 million settlement); Schnall v. Annuity and Life Re (Holdings) Ltd. (\$27 million settlement); and In re Qwest Communications International, Inc. (settlement obtaining \$25 million for the company and achieving corporate governance reforms aimed at ensuring board independence).

While Ms. Comite is experienced in all aspects of complex pre-trial litigation, she is particularly accomplished in achieving favorable results in discovery disputes. In Hohider v. United Parcel Service, Inc., Ms. Comite spearheaded a nearly year-long investigation into every facet of UPS's preservation methods, requiring intensive, full-time efforts by a team of attorneys and paralegals well beyond that



required in the normal course of pre-trial litigation. Ms. Comite assisted in devising the plan of investigation in weekly conference calls with the Special Master, coordinated the review of over 30,000 documents that uncovered a blatant trail of deception and prepared dozens of briefs to describe the spoliation and its ramifications on the case to the Special Master. In reaction to UPS's flagrant discovery abuses brought to light through the investigation, the Court conditioned the parties' settlement of the three individual ADA cases on UPS adopting and implementing preservation practices that passed the approval of the Special Master.

Prior to entering law school, Ms. Comite served in the White House as Assistant to the Special Counsel to President Clinton. In that capacity, she handled matters related to the White House's response to investigations, including four independent counsel investigations, a Justice Department task force investigation, two major oversight investigations by the House of Representatives and the Senate, and several other congressional oversight investigations.

Ms. Comite's volunteer activities have included assisting immigrant women, as survivors of domestic violence, with temporary residency applications as well as counseling sexual assault survivors. Currently, Ms. Comite supports Connecticut Children's Medical Center and March of Dimes/March for Babies.

MICHELLE CONSTON

PRACTICE EMPHASIS

Michelle Conston's practice focuses on antitrust litigation.

ADMISSIONS

The Second Circuit Court of Appeals; The Sixth Circuit Court of Appeals; Southern District of New York; Eastern District of Michigan; States of New York, New Jersey and Florida

EDUCATION

Marist College (B.A. Journalism, magna cum laude, 2010); University of Miami School of Law (J.D., magna cum laude, 2013)

ACCOLADES

Super Lawyers Rising Star in Antitrust Litigation in 2018-2021.



HIGHLIGHTS

Ms. Conston is an associate in Scott+Scott's New York office and devotes much of her time representing investors in cases involving the manipulation of financial benchmarks by numerous major banks, including *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 13-cv-7789 (S.D.N.Y.), *In re GSE Bonds Antitrust Litig.*, No. 19-cv-01704 (S.D.N.Y.), and *In re European Government Bonds Antitrust Litig.*, No. 19-cv-2601 (S.D.N.Y.). Ms. Conston also works on cases against pizza restaurants Papa John's and Domino's alleging that their no-poach agreements with their franchisees are per se illegal under the antitrust laws. *In re: Papa John's Employee and Franchisee Employee Antitrust Litig.*, No. 18-cv-00828 (E.D. Ky.) and *Blanton v. Domino's Pizza Franchising LLC*, No. 18-cv-13207 (E.D. Mich.).

During law school, Ms. Conston served as a judicial intern for the Honorable Stephen T. Brown, the Chief Magistrate Judge of the United States District Court for the Southern District of Florida. Ms. Conston also served as a certified legal intern for the United States Attorney's Office for the Southern District of Florida.

Prior to joining Scott+Scott, Ms. Conston represented institutional investors, hedge funds, and individual investors in complex class action litigation arising under the Commodity Exchange Act, Sherman Act, RICO Act, and common law. She was heavily involved in litigating actions alleging the manipulation of the London Interbank Offered Rate ("LIBOR") for several currencies by large financial institutions (e.g., *Laydon v. Mizuho Bank, Ltd.*, No. 12-cv-3419 (S.D.N.Y.) and *Sullivan v. Barclays plc*, No. 13-cv-00281 (S.D.N.Y.)), as well as an action alleging manipulation of the daily London Silver Fixing by the Fixing Banks and several other financial institutions (*In re London Silver Fixing, Ltd.*, Antitrust Litig., No. 14-md-02573 (S.D.N.Y.)).

ALEX OUTWATER

ADMISSIONS

State of California; United States District Courts for the Northern, Central, and Southern Districts of California

EDUCATION

University of San Diego School of Law (J.D., 2008), University of California, Santa Barbara (B.A., Italian Cultural Studies, 1999)



PRACTICE EMPHASIS

Alex Outwater's practice focuses on complex antitrust and consumer class actions.

REPRESENTATIVE CASES

Indiana State District Council of Laborers and HOD Carriers Pension and Welfare Fund v. Omnicare, Inc., 2:06-cv-00026-WOB-CJS (E.D. Ky.): (settlement valued at \$20 million)

In Re Tesla Motors, Inc. Stockholder Litigation, No. 12711-VCS (Del. Ch.): an action alleging Elon Musk, as Tesla's controlling stockholder, and Tesla's Board of Directors, breached fiduciary duties to Tesla shareholders in connection with Tesla's \$2.6 billion acquisition of SolarCity (a company in which Musk held a substantial interest)

ANJA RUSI

PRACTICE EMPHASIS

Ms. Rusi's practice focuses on complex consumer class actions with a focus on deceptive pricing and data breach litigation. She also represents governmental entities who are bringing actions against pharmaceutical manufacturers and distributors in opioid litigation, other than in Connecticut. Ms. Rusi also represents clients in various Connecticut state court matters including negligence, contractual disputes, and probate administration.

ADMISSIONS

United States District Court for the District of Connecticut
State of Connecticut

EDUCATION

Fairfield University (B.A., 2013)
Western New England School of Law (J.D., 2016)

HIGHLIGHTS

Ms. Rusi is an associate in the firm's Connecticut office. Prior to joining the firm, Ms. Rusi worked for a midsized firm in Hartford representing clients in a broad range of areas including contract and commercial litigation, real estate litigation, and insurance law.

Ms. Rusi practices in varied Connecticut state court matters as well as federal class actions and has been recognized as a "Rising Star" by Connecticut Super Lawyers (2021).



SEAN RUSSELL

PRACTICE EMPHASIS

Mr. Russell is an attorney in Scott+Scott's San Diego office where he focuses on complex antitrust litigation and class actions.

ADMISSIONS

United States District Courts: Southern and Central Districts of California, Eastern District of Michigan; State of California

EDUCATION

University of San Diego School of Law (Masters of Taxation, 2016); Thomas Jefferson School of Law (J.D., cum laude, 2015); University of California, Davis (B.A., Economics, 2008)

HIGHLIGHTS

During law school, Mr. Russell was Chief Articles Editor of the Thomas Jefferson Law Review and a Moot Court Competitor. He also served as an extern to the Honorable William V. Gallo of the U.S. District Court for the Southern District of California.

REPRESENTATIVE CASES

- Represented class plaintiffs in *Veridian Credit Union v. Eddie Bauer LLC*, No. 2:17-cv-00356 (W.D. Wash.) which resulted in a \$9.8 million settlement.
- Represents class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate
- Actively involved in *In re UnitedHealth Group PBM Litigation*, No. 0:16-cv-3352 (D. Minn.) asserting ERISA and deceptive trade practice claims on behalf of nationwide class plan participants involving overcharge of co-payments for prescription drugs;
- Actively involved in *Josten v. Rite Aid Corp.*, No. 3:18-cv-00152 (S.D. Cal.), an action challenging Rite Aid's reporting of artificially higher prices for certain generic drugs to private and government insurance programs.
- Actively involved in numerous No-Poach cases where the franchisor and franchisee entered into agreements that prohibited the franchisees from soliciting or hiring the employees of other franchisees or the franchisor, including *Deslandes v. McDonald's USA, LLC*, No. 1:17-cv-04857 (N.D. Ill.); *Conrad v. Jimmy John's Franchise, LLC*, No. 3:18-cv-00133 (S.D. Ill.), *In re: Papa John's*



Employee and Franchisee Employee Antitrust Litigation, No. 3:18-cv-00825, and Blanton v. Domino's Pizza Franchising LLC, No. 2:18-cv-13207 (E.D. Mich.).

Outside of the office, Sean is an avid sailor, fisherman, and video gamer. He has sailed boats ranging from 22' to 50'+ and competed in over a dozen races. Sean prefers deep sea fishing out of San Diego or Shelter Cove, CA, however he won't pass up the chance to catch bass in a nearby river. Sean has had access to a computer since he was seven years old and prides himself in being a "techie" and video gamer. He can often be found walking his dog, Lucy, along the shores of San Diego.

J. ALEX VARGAS

PRACTICE EMPHASIS

J. Alex Vargas serves as Scott+Scott's Director of Investigations

ADMISSIONS

States of New York and California; District of Columbia

EDUCATION

University of San Diego School of Law (J.D., 2004); University of San Diego (B.A., 1997)

HIGHLIGHTS

Mr. Vargas is based in Scott+Scott's New York office and heads up our investigation department. He conducts and oversees investigations across all practice groups.

Mr. Vargas has devoted over a decade of his career investigating claims on behalf of institutional investors and other stakeholders in the class action arena. He has been involved in several high-profile securities fraud cases, including one where he served as the principal investigator in connection with a 14-year litigation, resulting in the largest securities fraud settlement following a trial; a record \$1.575 billion recovery in *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893 (N.D. Ill.). In 2019, Mr. Vargas was named to Lawdragon's prestigious list of 500 Leading Plaintiff Financial Lawyers.

Representative antitrust class actions include:

- In re GSE Bonds Antitrust Litigation, No. 1:19-cv-01704 (S.D.N.Y.) (\$386 million settlement)
 - Case Contributions: In June 2018 news reports indicated that the DOJ was investigating price-fixing in the secondary market for GSE bonds. After a thorough investigation, S+S filed suit alleging that investment banks serving as syndicate members in the primary GSE bond



- market had conspired to fix the price at which GSE bonds were traded in the secondary market. Mr. Vargas conducted an extensive pre-filing investigation and in doing so identified, interviewed and retained a key industry expert. Mr. Vargas worked closely with this expert to develop an intricate understanding of the industry, its key players, and the problematic practices alleged by the DOJ. Obtaining this highly relevant human intelligence at a very early stage in the investigation was instrumental in assessing the case's viability, and ultimately, in being first to file a highly detailed complaint.
 - Mr. Vargas "interviewed numerous industry insiders and ultimately retained a former highly-placed GSE Bond trader. [Mr. Vargas] worked with these industry experts to understand the regulatory framework and gain a thorough understanding of the GSE Bond market and the players in that market. Due to Counsel's extensive investigation, Plaintiff's complaint was the first to identify and allege the Defendants involved in the price-fixing conspiracy, its scope, and its duration." ECF No. 349, ¶¶18-19.
 - S+S was appointed Co-Lead based in part on their "substantial investigative work and investment of significant resources." Memorandum Order at 23, ECF No 159 (May 2, 2019)
- In re Cattle Antitrust Litigation, No. 19-cv-1222-JRT-HB (D. Minn.)
 - In re Foreign Exchange Benchmark Rates Antitrust Litigation, No. 1:13-cv-07789 (S.D.N.Y.)
 - Putman Bank v. Intercontinental Exchange, Inc., No 1:19-cv-00439 (S.D.N.Y.)
- Representative securities class actions include:
- Banerjee v. Avinger, Inc., No. 4:17-cv-03400 (N.D. Cal.) (\$5 million settlement)
 - Union Asset Management Holding AG v. SanDisk LLC, No. 3:15-cv-01455-VC (N.D. Cal.) (\$50 million settlement)
 - Case Contributions: S+S filed suit alleging that the defendant—a flash memory drive manufacturer—misled investors concerning the health and prospects of one of the company's business segments, as well as its success integrating a recently acquired entity. Through his investigation, Mr. Vargas obtained highly corroborative intelligence that attributed knowledge of the fraud to the company's CEO and CFO, thereby enabling S+S to overcome opposing counsel's Motion to Dismiss. Mr. Vargas provided ongoing support throughout the life of the case in order to fully authenticate the sourcing and accuracy of the information he had developed through the investigation; a point which had been highly contested by opposing counsel.
 - In re LendingClub Corp. S'holder, Litigation, No. CIV537300 (Cal. Super. Ct., San Mateo County) (\$125 million settlement)



- In re: EndoChoice Holdings, Inc. Securities Litigation, No. 2016-CV-277772 (Sup. Court, Fulton Cty, GA) (\$8.5 million settlement, preliminarily approved)
 - In re MobileIron, Inc. S'holder Litigation, No. 1-15-cv-284001 (Cal. Super. Ct., Santa Clara County) (\$7.5 million settlement)
 - Rubenstein v. Oilsands Quest Inc., No. 11-cv-288 (S.D.N.Y.) (\$10.2 million settlement)
- Representative consumer and data breach class actions include:
- In re Equifax, Inc. Customer Data Security Breach Litigation, No. 1:17-md-2800 (N.D. Ga.) (preliminary approval of settlement valued at \$32.5 million)
 - Case Contributions: S+S filed suit against Equifax in connection with the 2017 hack of the company, which led to the theft of highly sensitive consumer information belonging to nearly 148 million Americans. As alleged in the complaint, Equifax's senior management ignored specific warnings that its systems were vulnerable to attack and refused to take necessary steps to adequately protect consumer data. Mr. Vargas's investigation confirmed that Equifax failed to implement reasonable measures which are critical to safeguarding data; vulnerability scanning and patch management processes and procedures, restrictions and controls for accessing critical databases; network segmentation between internet facing systems and backend systems, and properly updated endpoint detection software.
 - In re Pacific Coast Oil Trust Securities Litigation, No. BC550418 (Cal. Sup. Ct., Los Angeles County) (\$7.6 million settlement)
 - Greater Chautauqua Federal Credit Union v. Kmart Corp., No. 15-cv-2228 (N.D. Ill.) (\$5.2 million settlement)
 - WinSouth Credit Union v. MAPCO Express, Inc., No. 14-cv-1573 (M.D. Tenn.) (largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information)
 - First Choice Federal Credit Union v. The Wendy's Co., No. 2:16-cv-00506 (W.D. Pa.) (\$50 million settlement)

