

CITY OF COCONUT CREEK

Lieff Cabraser/Robbins Geller Submission

Relating to the Opioid Litigation Investigation

March 12, 2018



Lieff Cabraser Heimann & Bernstein, LLP and Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) and (collectively, the “LC/RG Team” or the “Team”) are pleased to submit their credentials to serve as outside legal counsel for investigation of the opioid litigation to the City of Coconut Creek. The LC/RG Team would be honored to represent the City’s interests in opioid related litigation.

A. Relevant Experience

The LC/RG Team is uniquely qualified to represent the City in litigation against opioid manufacturers, distributors and/or other culpable parties to recover damages incurred by the City. Robbins Geller and Lieff Cabraser currently represent several cities and counties in similar litigation against the manufacturers and distributors of prescription opioids who, by their deceptive conduct, also wrongfully contributed to the opioid crisis in the City of Coconut Creek. Additionally, due to their credentials and reputations, both Elizabeth J. Cabraser of Lieff Cabraser and Paul J. Geller of Robbins Geller were recently selected to serve on the Plaintiffs’ Executive Committee of the multidistrict litigation (“MDL”), *In re National Prescription Opiate Litigation*, MDL No. 2804 (N.D. Ohio), which is comprised of more than 200 cases related to the opioid crisis. In addition to being appointed to the **Plaintiffs’ Executive Committee**, the Judge overseeing the *National Prescription Opiate Litigation*, Judge Dan Aaron Polster, issued an order appointing a group of seven attorneys to represent plaintiffs on a **settlement committee**. Elizabeth Cabraser and Paul Geller are two of the attorneys who were appointed to that committee and thus will play an instrumental role in moving this litigation forward toward a global resolution.

Our Team is unique in its combined expertise, not only as national leaders in complex litigation in both state and federal court, but in the particular subject areas at issue in this litigation. Courts have repeatedly acknowledged that expertise and our reputation for excellence with numerous leadership appointments, not only in MDL proceedings but in many other contexts as well. The LC/RG Team’s specific expertise in the practice areas that are central to this litigation is also unsurpassed. The Team’s list of successes involving consumer protection, RICO, false claims act and pharmaceutical cases is extensive.¹ Moreover, our firms have successfully litigated against many of the largest pharmaceutical companies, including McKesson Corporation; Johnson & Johnson; Janssen Pharmaceuticals, Inc.; Bayer Corporation; Teva Pharmaceuticals; Actavis and Cephalon, Inc., among others, as well as many of the largest multinational companies in the world, including Exxon, Enron, Volkswagen, British Petroleum, Google, Facebook, E.I. DuPont de Nemours and Apple.

The LC/RG Team’s history of prosecuting nationwide fraud actions against major pharmaceutical companies is long and unmatched. Robbins Geller and Lieff Cabraser have successfully prosecuted and obtained significant recoveries in connection with fraud cases brought against drug manufacturers and wholesalers, including Cardinal Health (\$600 million), Pharmacia Corporation (\$164 million), McKesson (\$115 million) and Intercept Pharmaceuticals

¹ Additional information regarding the firms’ successes is available at www.rgrdlaw.com for Robbins Geller and at www.lchb.com for Lieff Cabraser. In addition, both firms would be happy to provide their firm résumés which contain a more comprehensive list of the firms’ cases.

(\$55 million), among others. Additionally, the Team has recovered a combined \$1.7 billion dollars from Pfizer in various cases regarding the company's off-label marketing practices. As sole lead counsel, Robbins Geller obtained a \$400 million settlement with Pfizer on the eve of trial in a case concerning Pfizer's deceptive off-label marketing of several drugs, including Bextra, and payments of kickbacks to doctors to promote sales. Working together with Elizabeth Cabraser as chair of the Plaintiffs' Steering Committee, the Bextra Team recovered a total of \$1 billion from Pfizer. Continuing this important work, Robbins Geller was recently appointed to serve as lead counsel in an action against Mylan Pharmaceuticals and other drug companies regarding their anti-competitive conduct in the sale of EpiPen epinephrine auto-injectors, resulting in a monopoly that has made them billions of dollars at the expense of consumers and third party payors. Notably, Robbins Geller was selected by the court after it received the unanimous support of every plaintiffs' firm with an action pending in the sprawling EpiPen MDL.

Lieff Cabraser and Robbins Geller also routinely represent government entities in securities, consumer protection, and antitrust matters, and have long histories of leading nationwide multidistrict and class action litigation in the public interest. Our firms are well versed in representing governmental entities and recognize the importance of working closely with the City Attorney on all aspects of the litigation. Robbins Geller currently provides legal services to more than 100 governmental entities in the State of Florida: the City of Melbourne Firefighters' Retirement System, City of Melbourne General Employees' Pension Plan, City of Melbourne Police Officers' Retirement System, Palm Bay Police & Firefighters' Pension Fund, City of Cocoa Beach Firefighters' Retirement System, City of Cocoa Beach Police Officers' Retirement System and the City of Cocoa General Employees' Retirement Plan.

If selected to represent the City, the LC/RG Team is well-equipped to handle all aspects of the investigation and potential litigation. The Team has already conducted an extensive pre-filing investigation into the defendants' national and local practices in support of the other related actions in which the firms have been retained. Based on our investigation to date, the Team has determined the most viable legal theories, amassed substantial evidence, and identified and consulted with leading experts on the opioid crisis. The Team has also prepared complaints against the manufacturers and distributors based on our extensive investigation of the underlying facts and the causes of action arising therefrom.

In order to maximize the recovery for the City, the LC/RG Team will zealously pursue discovery, drawing upon its significant experience prosecuting off-label marketing cases, and specifically, serving precision-tailored discovery requests designed to expose defendants' fraudulent marketing in drug cases. Lieff Cabraser and Robbins Geller have sophisticated, in-house, technical departments with the capability of handling electronic document-intensive litigation in a sophisticated and efficient manner. Together, the Team has the capacity to maintain millions of pages of document production and handle the complex issues that can arise in this type of litigation in-house. Our firms have entire departments devoted to Litigation Support, Information Technology and Word Processing, as well as distinct Research, Financial Analysis and Services departments, all of which position the Team to limit the often high cost of outside vendors.

If necessary, the LC/RG Team is uniquely qualified to take this action to trial in order to maximize results for the City. Our Team includes world-class trial attorneys, allowing us to see any litigation through to a verdict on the merits. For example, Richard M. Heimann of Lief Cabraser is nationally recognized as one of the foremost trial attorneys and skilled negotiators in the country. Beyond his list of \$100 million plus verdicts and settlements, Mr. Heimann's experience is particularly notable in this context having served as lead trial counsel against McKesson Corporation in a case that settled weeks before trial, and as lead counsel in Lief Cabraser's landmark litigation against the tobacco industry. Patrick Coughlin of Robbins Geller worked closely with Mr. Heimann on the tobacco litigation years ago, starting this long-developing working relationship between the two firms. Mr. Coughlin enjoys a similar reputation to Mr. Heimann as one of the preeminent trial attorneys in the country, having tried over 50 cases, including a \$120 million jury verdict against Apple.

The LC/RG Team has the experience and expertise necessary to not only try, but also settle, highly complex fraud actions brought against deep-pocketed defendants. Having obtained in excess of **\$185 billion** in recoveries for our clients, our Team has a proven track record and is ready to present a targeted attack against the responsible parties and help the City quickly and efficiently obtain relief. We are no strangers to high-profile, bet-the-company litigation that requires both strength and finesse to ensure that our individual clients achieve their goals. This expertise is derived from decades of experience zealously and effectively pursuing litigation and bringing a credible threat of trial – no matter how substantial the opposition. Our Team boasts multiple \$100 million plus and other substantial trial verdicts and a deep bench of attorneys who are courtroom tested and trial ready. That credible threat has repeatedly led to successful settlement of claims which frequently have altered entire industries for the good of the public while redressing our clients' specific needs. Occasionally, defendants have elected to bet the company against our trial teams and when they have, time and time again, they have lost.

For example, in *Jaffee v. Household Int'l, Inc.*, No. 1:02-cv-05893 (N.D. Ill.), Robbins Geller represented a class of defrauded investors against Household International, Inc. At trial, the jury returned a verdict in plaintiffs' favor. Defendants appealed to the Seventh Circuit, which reversed and remanded on a limited issue. On the eve of the second trial, Robbins Geller achieved a **\$1.575 billion** settlement.

The Team specializes in prosecuting and settling complex cases against well-funded defendants represented by the most zealous defense firms. In this case, the Team's experience working opposite one of the defendants' lead attorneys may be of particular assistance. On November 17, 2017, Purdue Pharma, LP announced that it had hired Ms. Sheila Birnbaum of Quinn Emanuel Urquhart & Sullivan, LLP to lead its defense in opioid litigation, signaling that it may be in a settlement posture. The LC/RG Team has a long history of working opposite Ms. Birnbaum in resolving actions, including in *Pfizer*, which settled on the eve of trial for \$400 million, tobacco litigation brought on behalf of various California cities and counties, which settled for \$12.5 billion, as well as in *Neurontin* and *Breast Implants* litigation.

The LC/RG Team, and Elizabeth Cabraser and Paul Geller in particular, also have unparalleled experience serving in a leadership capacity in Multidistrict Litigation. Included in **Exhibit 1**, is a list of cases in which attorneys from Lief Cabraser and/or Robbins Geller were appointed by the MDL courts to serve in a leadership capacity. These cases include some of the

most substantial and impactful civil litigation in the last half century and represent some of the largest and most substantial successes ever achieved, both monetarily and in terms of the relief obtained for the public. To the extent the City decides to file in federal court, and has its litigation transferred as part of an MDL, the Team will draw upon its vast MDL experience to advance the litigation and aggressively pursue discovery needed to defeat dispositive motions.

The following are some examples of Team members' extensive experience suing pharmaceutical and other healthcare companies:

Neurontin Marketing and Sales Practices Litigation, MDL No. 1629 (D. Mass.)

Lieff Cabraser served on the Plaintiffs' Steering Committee in an MDL arising out of the off-label sale and marketing of the prescription drug Neurontin, manufactured by Parke-Davis, a division of Warner-Lambert Company, which was later acquired by Pfizer, Inc. Lieff Cabraser served as co-counsel to Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals ("Kaiser") in Kaiser's trial against Pfizer in the litigation. On March 25, 2010, a federal court jury determined that Pfizer violated a federal anti-racketeering law by promoting its drug Neurontin for unapproved uses and found Pfizer must pay Kaiser damages up to \$142 million.

At trial, Kaiser presented evidence that Pfizer knowingly marketed Neurontin for unapproved uses without proof that it was effective. Kaiser said it was misled into believing neuropathic pain, migraines and bipolar disorder were among the conditions that could be treated effectively with Neurontin, which was approved by the Federal Drug Administration ("FDA") as an adjunctive therapy to treat epilepsy and later for post-herpetic neuralgia, a specific type of neuropathic pain.

In November 2010, the court issued Findings of Fact and Conclusions of Law on Kaiser's claims arising under the California Unfair Competition Law, finding Pfizer liable and ordering that it pay restitution to Kaiser of approximately \$95 million. In April 2013, the First Circuit Court of Appeals affirmed both the jury's and the district court's verdicts. In November 2014, the court approved a \$325 million settlement on behalf of a nationwide class of third party payors.

Yaz[®]/Yasmin[®]/Ocella[®] Products Liability Litigation, MDL No. 2100 (S.D. Ill.)

Lieff Cabraser played a central role in the Yaz[®] litigation, representing numerous individual women, and working extensively to the common benefit of all of the Yaz[®] cases. The Yaz[®] cases involved combined oral contraceptive pills manufactured by Bayer Corporation. For these birth control pills, Bayer sought unique and narrow indications from the FDA for moderate to severe acne and pre-menstrual dysphoric disorder. Plaintiffs alleged that Bayer improperly promoted these drugs for off-label use in individuals with mild acne and pre-menstrual syndrome, for which Bayer was repeatedly cited by the FDA and failed to warn of the products' higher risk of blood clots than other birth control pills in the same class.

Lieff Cabraser partners Wendy Fleishman and Paulina do Amaral were trial counsel in *Moore v. Bayer*, one of two cases that were set for trial in January 2012. Just weeks before trial was set to commence, defendants entered into a settlement program that resulted in resolution of the entire litigation. Because the *Bayer* case was stayed just prior to trial, Lieff Cabraser had

already engaged in extensive trial preparation, including detailed analysis of the available evidence, creation of exhibit lists out of more than 80 million pages of document productions, as well as deposition cuts, and extensive motion practice.

In addition to bringing this case to the eve of trial, Lieff Cabraser also played a pivotal role in the MDL for the common benefit of all of the plaintiffs nationwide. Working closely with Dr. David Kessler, the former head of the FDA, and other experts, Lieff Cabraser played a central role in the development of the entire off-label liability case against Bayer. Lieff Cabraser also played a central role in presenting that evidence to the Advisory Committee to the FDA, which resulted in changes to the labeling of products including important additional warnings. Ultimately, Bayer paid over \$2.2 billion in settlements resulting from the *Yaz*[®] and *Yasmin*[®] litigation.

Jones v. Pfizer Inc., No. 1:10-cv-03864-AKH (S.D.N.Y.)

After a full year of research and analysis, Robbins Geller, serving as sole lead counsel, commenced this action in May 2010 on behalf of lead plaintiff, Stichting Philips Pensioenfonds. The complaint alleged that Pfizer executives defrauded investors by deliberately concealing the risks to Pfizer stemming from the company's illegal off-label promotion of its drugs Lyrica, Geodon, Zyvox and Bextra, as well as violations of anti-kickback laws with respect to several other drugs. In January 2015, after discovery procedures, including the review of more than 25 million pages of documents and taking 45 depositions of fact witnesses, and just days before trial was scheduled to begin, Pfizer announced that it had agreed to pay \$400 million to resolve the action. Robbins Geller had moved 17 attorneys and staff to New York, and was fully prepared to begin trial at the time the settlement was reached.

B. Financial Wherewithal

This Team provides unsurpassed financial strength giving us the heft to confront any group of the multinational corporations in the opioid chain of distribution, no matter how large or well-funded, without requiring any third-party financing. Our Team has combined over \$20 million in cash reserves as well as access to over \$50 million in untouched credit lines. In addition, we have over \$85 million in E&O Insurance coverage.

Lieff Cabraser's financial wherewithal is demonstrated by its ability to prosecute many massive complex cases against the world's largest, multinational corporations at the same time. In just the last two to three years, Lieff Cabraser has litigated against Google, Facebook, Volkswagen, General Motors, Takata, Bank of New York, Goldman Sachs, British Petroleum and the Tobacco industry, among many others, contemporaneously. The firm regularly takes on cases that require significant outlays of capital over extended periods of time and does not shy away from cases simply because the case will be long, expensive or hard fought.

Similarly, Robbins Geller has a proven track record of successfully litigating the most complex, expensive and protracted cases without the need for co-counsel or external funding. The firm has demonstrated success in funding long-lasting, high-cost litigation throughout trial and appeals. One example of Robbins Geller's ability and willingness to finance and manage complex and costly actions is the *Household* case, which Robbins Geller filed in 2002, invested

\$34 million in cash over 14 years, and settled in 2016 for \$1.575 billion. The firm's ability and willingness to continue financing the *Household* case through trial, appeal and remand – all the way up to the night before a second trial – resulted in a recovery for the class that was hundreds of millions of dollars, or even a billion dollars, more than it would have been had the firm balked at incurring tens of millions of dollars of financial exposure to one lawsuit. The firm's conservative management of its finances, coupled with its willingness to advance costly litigation expenses in the pursuit of meritorious cases, allows the firm to obtain the maximum recovery possible for its clients.

In sum, the Team is not only able, but also willing, to litigate this case as far as necessary to ensure the best net recovery for the City and is committed to undertaking the financial responsibility to support the full costs of litigation throughout trial and any potential appellate processes.

C. Current Opioid Litigation.

As noted, our team leaders are playing critical roles in the current national opiate litigation. Both Elizabeth Cabraser and Paul Geller were appointed to the 17-member **Plaintiffs Executive Committee** by Judge Dan Aaron Polster in *In re National Prescription Opiate Litigation*, MDL No. 2804. Moreover, both Ms. Cabraser and Mr. Geller were among only 7 plaintiffs' attorneys appointed by Judge Polster to a national **Settlement Committee** tasked with negotiating a global resolution to the more than 400 federal cases currently pending in the MDL. Further, Ms. Cabraser is chair of the Law and Briefing Committee on which Paul Geller, Paulina do Amaral, Mark Dearman, and Aelish Baig are serving. In addition, Paulina do Amaral is serving on the State-Federal Liaison Committee, monitoring and tracking the pending litigation in state courts across the country.

Beyond our significant role in the MDL, we are also currently retained by the following cities, counties, Native American tribes, and third party payors to represent their interests in the opioid litigation. Thus far, Lief Cabraser and/or Robbins Geller have filed the 8 cases listed below and, in addition, have been hired to investigate opiate litigation by Broward County and the City of Ft. Lauderdale, Florida; the City of Phoenix, Arizona; Montgomery and Baltimore Counties, Maryland; the City of Concord, New Hampshire; several other cities and counties in Tennessee, Michigan, Maryland and California as well as by several Native American Tribes in California and Washington State. Lief Cabraser and Robbins Geller have also been short-listed for retention by Palm Beach County, Florida.

1. *City of Delray Beach v. Purdue Pharma L.P., et al.*, No. 9:17-cv-81384 (S.D. Fla. December 21, 2017): Robbins Geller filed suit on behalf of the City of Delray Beach in Palm Beach County. Robbins Geller is leading all aspects of the litigation.

2. *County of Wayne, et al. v. Purdue Pharma L.P., et al.*, No. 4:17-cv-13334 (E.D. Mich. Oct. 12, 2017): Robbins Geller filed suit on behalf of the Counties of Wayne and Oakland, Michigan. Robbins Geller is leading all aspects of the litigation.

3. *Metropolitan Government of Nashville and Davidson County, Tennessee v. Purdue Pharma, L.P.*, No. 3:17-cv-01605 (M.D. Tenn. Dec. 22, 2017): Lief Cabraser

filed suit on behalf of the City of Nashville, Tennessee and is leading all aspects of the litigation.

4. *Smith County, Tennessee v. Purdue Pharma, L.P., et al.*, No. 2:17-cv-00078 (M.D. Tenn. Dec. 19, 2017): Lief Cabraser filed suit on behalf of Smith County, Tennessee and the firm is leading all aspects of the litigation.

5. *American Federation of State, County and Municipal Employees (AFSCME) Dist. Council 37 v. Purdue Pharma L.P., et al.*, No. 17-cv-02585 (N.D. Ohio Dec. 12, 2017): Lief Cabraser filed suit and is leading all aspects of the litigation.

6. *Cleveland Teachers Union Local 279 v. Purdue Pharma L.P.*; No. 1:18-OP-45135-DAP (M.D. Tenn. Jan. 30, 2018): Lief Cabraser filed suit and is leading all aspects of the litigation.

7. *Rutherford County, Tennessee v. Purdue Pharma, L.P., et al.*, No. 3:18-MC-0999 (M.D. Tenn. Feb. 26, 2018): Lief Cabraser filed suit and is leading all aspects of the litigation.

D. Team Qualifications

Lief Cabraser Team Members:

Elizabeth J. Cabraser. Ms. Cabraser is one of the most highly regarded and experienced complex litigation attorneys in the country. She has had an individual AV-rating for over 20 years and has been repeatedly acknowledged as one of the country's most prominent mass tort lawyers with decades of experience in consumer protection and pharmaceutical litigation. She represents both governmental entities under the deceptive practice and consumer protection statutes of all states and personal injury victims under state tort laws. She has been repeatedly recognized by *The National Law Journal* as one of the 100 most influential lawyers in the United States. Ms. Cabraser brings a level of intellectual sophistication unparalleled in the legal community. Her legal acumen honed in an academic setting as a professor of complex litigation at both Columbia University Law School and Boalt Hall, University of California at Berkeley, is a product of both her day to day practical experience serving as lead counsel in MDLs and class actions across the country, her passion for the law and her compunction to advance justice on behalf of the community.

Ms. Cabraser has been in the leadership of many of the most significant cases of the past several decades, including, most recently, *BP, Takata*, and *VW Clean Diesel*. Ms. Cabraser was recently appointed by MDL Judge Dan Aaron Polster to the Plaintiffs' Executive Committee of *In re National Prescription Opiate Litigation*, MDL No. 2804 (N.D. Ohio). In *VW Clean Diesel*, after nine months of intensive negotiation and extraordinary coordination led on the class plaintiffs' side by Ms. Cabraser as sole lead counsel and chair of a 22-member Plaintiffs' Steering Committee, a set of interrelated 2.0-liter vehicle settlements totaling \$14.7 billion were given final approval in 2016. In May 2017, a further settlement valued at \$1.2 billion-\$4.04 billion for 3.0-liter engine vehicles received final approval. "[T]he total cost of penalties, buybacks and fixes in North America [could exceed] \$23 billion as Volkswagen tries to overcome the biggest scandal in modern automotive history." Kartikay Mehrotra, "VW Reaches

\$1.2 Billion Settlement Over Audi, Porsche Diesels,” *Bloomberg News*, Feb. 1, 2017. Ms. Cabraser was also appointed to the Plaintiff’s Steering Committee in the *Neurontin* litigation and was in the leadership in the *Breast Implants* litigation, in both cases of which, she worked opposite defense counsel Sheila Birnbaum to successfully resolve those cases.² These settlements, unprecedented for their scope and complexity, comprise one of the largest payments in American litigation and the largest known consumer class settlement.

Richard M. Heimann. Mr. Heimann is nationally recognized as one of the foremost trial attorneys and skilled negotiators in the country. Beyond his list of \$100 million plus verdicts and settlements, Mr. Heimann’s experience is particularly notable in this context having served as lead trial counsel against McKesson Corporation in a case that settled weeks before trial, and as lead counsel in Lief Cabraser’s landmark litigation against the tobacco industry. The chair of Lief Cabraser’s financial fraud and securities practice group, Mr. Heimann spends as much time and resources as necessary to build a plaintiff case to hold our nation’s most powerful corporations accountable for their misconduct. As a result, *Benchmark Litigation* named Mr. Heimann one of the Top 100 Trial Lawyers in America in 2017, and *California Lawyer* magazine has twice recognized him with its prestigious California Lawyer of the Year award. Mr. Heimann supervised the firm’s landmark litigation against the tobacco industry on behalf of Massachusetts, California and several other states. Resolved in 1998, the litigation led to a record \$206 billion master settlement agreement with state Attorneys General. Mr. Heimann has successfully tried over 50 civil jury cases, highlighted by the *FPI/Agretech* and *Edsaco* securities class action trials (\$170.7 million), the *Wells Fargo Bank* overdraft fees consumer protection class action trial (\$203 million), and the *LCDs* antitrust class action (settlements over \$470 million). He continues to hold the tobacco industry accountable for its 50-year conspiracy of misrepresenting the dangers of smoking cigarettes, most recently representing individual smokers and families of loved ones who died as part of the *Engle* litigation in federal court in Florida. In May 2014, Mr. Heimann was lead trial counsel in an action against R.J. Reynolds Tobacco Company, Philip Morris USA, Inc. and Lorillard Tobacco Company for causing plaintiff Pauline Burkhart to develop Chronic Obstructive Pulmonary Disease (COPD). The jury returned a verdict of \$7.5 million (\$5 million in compensatory damages and \$2.5 million in punitive damages). In the firm’s high profile litigation against Apple, Google and other tech giants for suppressing the wages of their technical, creative and other salaried employees, *In re HighTech Employee Antitrust Litig.*, Mr. Heimann was deeply involved in the fact discovery portion of the litigation, taking the depositions of many of the defendants’ top executives, including Google’s Eric Schmidt, Larry Page and Sergey Brin. In 2010, the *Daily Journal* selected Mr. Heimann as one of the Top 100 Attorneys in California, commenting that he possessed “a level of doggedness that is making him a feared litigator,” and in its 2015 inaugural review of the nation’s top lawyers, *Law360* named him one of its 50 “Trial Aces,” the only awardee practicing at a firm that represents only plaintiffs.

Steven E. Fineman. Mr. Fineman is Lief Cabraser’s Managing Partner and a senior member of the firm’s Torts and Securities and Financial Fraud practice group. He has more than 25 years of experience in prosecuting complex civil litigation, including class and individual consumer protection, personal injury and mass torts actions, and securities fraud actions.

² Ms. Birnbaum was recently hired by Purdue Pharma PC as its lead counsel.

Mr. Fineman represents institutional and classes of investors in securities and financial fraud cases; whistleblowers and public entities in False Claims Act matters; classes and groups of individuals in mass tort litigation; and classes of consumers in false marketing and deceptive business practice cases. Mr. Fineman has been recognized for his success as a litigator by *Best Lawyers in America* (2016 New York City Mass Tort Litigation/Class Actions, Plaintiffs' Lawyer of the Year); *Super Lawyers* (Securities Litigation); and *Benchmark Plaintiffs* (Litigation Star; National Practice, Mass Tort/Product Liability and Local Litigation Star; New York, Securities and Mass Torts). He previously served as the co-chair of the Securities Litigation Group of the American Association for Justice. Mr. Fineman is also a member of the bar of the District of Columbia.

Mark P. Chalos. Mr. Chalos is a top litigator who works on complex civil cases in federal courts in Tennessee and across the United States representing consumers in product defect cases and individuals who have suffered catastrophic personal injuries and families whose loved ones died because of the negligence or misconduct of others, as well as whistleblowers and public entities in False Claims Act cases. Mr. Chalos serves on the Plaintiffs' Steering Committee on behalf of Tennessee patients killed or left permanently injured following epidural steroid injections administered from contaminated medication manufactured by the New England Compounding Center in 2012. He also serves as the Federal/State Litigation Liaison for the plaintiffs in the case. Mr. Chalos has been appointed to additional leadership roles in *In re Whirlpool Front Loading Washer Products Liability Litigation* (Co-Lead MDL Counsel); *In re Navistar Diesel Engine Product Liability Litigation* (Plaintiffs' Steering Committee and Co-Chair Plaintiffs Expert Committee); and *In re Ford Switch Fire Litigation* (Plaintiffs' Steering Committee). Mr. Chalos also works on product defect cases against numerous U.S. and foreign corporations making and selling allegedly defective or dangerous consumer products. Some cases involve products causing unfair economic loss while others involve products causing serious injuries or fatalities. In July 2017, Mr. Chalos filed a consumer fraud class action against Ford Motor Company in the Western District of Kentucky on behalf of business owners and lessees of 2015-2017 Ford Transit vans alleging the vans are equipped with defective parts, resulting in expensive damages to the vehicles and presenting a significant safety risk to passengers.

Lexi J. Hazam. An emerging leader within the plaintiffs' bar, Lexi Hazam is co-chair of Lief Cabraser's mass torts practice group, and is an expert in *qui tam* and complex class actions. She has been appointed by the court overseeing the nationwide Abilify gambling injuries MDL to the Plaintiffs' Executive Committee and the Science and Expert Sub-Committee for the case, and was also appointed by the court overseeing the nationwide *Benicar* MDL to the Plaintiffs' Steering Committee therein and serves as Co-Chair of the *Benicar* MDL Plaintiffs' Science and Experts Committee. Ms. Hazam has also spoken at several conferences on *Benicar* injuries and *Benicar* lawsuits. A settlement valued at \$300 million in the case was announced in August 2017. Ms. Hazam's *qui tam* cases include the *Office Depot* litigation, a lawsuit alleging that Office Depot knowingly overcharged California cities, counties, and school districts on office and school supplies purchased under U.S. Communities contracts, that settled in 2015 for \$68.5 million. She has also worked on several additional *qui tam* cases alleging Medicare fraud. In 2016, she was elected as Chair Elect of the American Association for Justice's Section on Toxic, Environmental, and Pharmaceutical Torts (STEP), having previously served in 2015 as Vice-

Chair of the section. Ms. Hazam was also selected in 2016 as Co-Secretary of the *Qui Tam* Litigation Group.

Paulina do Amaral. Ms. do Amaral has been litigating pharmaceutical cases for over 18 years and is currently the primary Lieff Cabraser attorney handling the Talc consumer protection litigation against Johnson & Johnson on behalf of the Mississippi Attorney General. Ms. do Amaral carefully crafted the *Talc* complaint and successfully avoided removal of the action to federal court. She has also successfully beaten back three motions to dismiss from which interlocutory appeals were taken. Over the course of her career, Ms. do Amaral has represented thousands of individual plaintiffs in complex multidistrict pharmaceutical and environmental litigation, most of which raised issues of off-label marketing. She was on the trial team for one of two bellwether *Yaz* cases when the entire litigation settled within weeks of trial, and served on the Discovery and Science Committees in the *Yaz* MDL. Ms. do Amaral also gained significant experience litigating on behalf of cities and counties across the country as part of the Gun Litigation.

Kenneth S. Byrd. A lifelong Nashvillian, Mr. Byrd is an experienced trial attorney at Lieff Cabraser, obtaining several large jury trial verdicts against Big Tobacco over the past several years. His trial verdicts directly led to a rare mass settlement with Big Tobacco in a settlement resolving more than 400 cases and totaling \$100 million for injured smokers and their families. He received the Tennessee Association for Justice's 2015 Paladin Award for his successful litigation against cigarette manufacturers R.J. Reynolds Tobacco Company, Philip Morris USA Inc., and Lorillard Tobacco Company in Florida federal courts. The Paladin Award is TAJ's highest honor and is given to the state's top trial lawyer of the year. Mr. Byrd represents Lieff Cabraser clients in mass tort cases, defective product cases and consumer fraud litigation. He also has represented the interests of the United States government in *qui tam* actions against the pharmaceutical industry in cases involving the off-label promotion of prescription drugs. Mr. Byrd is currently helping Lieff Cabraser's team of lawyers overseeing the nationwide Abilify gambling injuries MDL in federal court in Florida.

John Spragens. A lifelong Nashvillian, Mr. Spragens has represented plaintiffs in whistleblower, consumer protection, mass tort, and antitrust litigation. A member of the firm's defective products and personal injury practice groups, he has represented families of deceased smokers in trials in Florida federal court against the tobacco companies for their 50-year conspiracy of misrepresenting the dangers of smoking cigarettes and for intentionally engineering the design of cigarettes to make them more addictive. In 2014, he participated in a tobacco industry trial in which a jury awarded his gravely injured client \$27 million in compensatory and punitive damages. He was named to the *National Trial Lawyers* "Top 100" Tennessee and a *Mid-South Super Lawyers* "Rising Star" in 2016 and 2017. He previously served as communications director to U.S. Congressman Jim Cooper; law clerk to the Hon. Kevin H. Sharp, Former Chief Judge of the United States District Court for the Middle District of Tennessee; and a healthcare fraud attorney at Bass, Berry & Sims PLC. He is active in the Nashville community, where he serves on the Nashville Bar Foundation Leadership Forum Steering Committee.

Kelly McNabb. Ms. McNabb is an experienced lawyer specializing in personal injury, mass tort litigation, and False Claims Act litigation. She has been involved with the *Benicar*

MDL, including assisting in the Daubert briefing, which recently led to an aggregate settlement in the amount of \$300 million. Since 2015, Ms. McNabb has played an integral role in a declined qui tam lawsuit involving the off-label promotion of several pharmaceutical products, which resulted in a confidential settlement earlier this year. Recently, Ms. McNabb played a vital role in the *Abilify* MDL to develop expert reports, defend and take expert depositions, and prepare experts to testify at the Daubert hearing. Prior to joining Lieff Cabraser, Ms. McNabb worked closely with the firm in a joint effort to prosecute claims involving premature infant injuries and death allegedly caused by a product used to thicken baby formula. Because of her role in the litigation, Ms. McNabb received the Minnesota “Attorney of the Year” award as a member of her former firm’s litigation team.

Robbins Geller Team Members:

Paul J. Geller. Mr. Geller, who would serve as the lead attorney in matters relating to the County, manages Robbins Geller’s Boca Raton office and is a member of the firm’s Executive and Management Committees. Mr. Geller also serves as head of the Firm’s Consumer Practice Group. In January of this year, Mr. Geller was selected to serve in a leadership position on behalf of governmental entities and other plaintiffs in the sprawling litigation concerning the nationwide prescription opioid epidemic. In reporting on the selection of the attorneys to lead the case, *The National Law Journal* claimed, “The team reads like a ‘Who’s Who’ in mass torts.” In January 2016, Mr. Geller was selected by Judge Breyer of the United States District Court for the Northern District of California to serve on the Plaintiffs’ Steering Committee for the massive consolidated class action concerning Volkswagen’s illegal emissions cheating scandal. Currently, Mr. Geller serves as a member of Plaintiffs’ Steering Committee in *In re Liquid Aluminum Sulfate Antitrust Litig.*, a case regarding a conspiracy to fix prices for a water treatment chemical, liquid aluminum sulfate, and as co-lead counsel in a nationwide class action that alleges that pharmaceutical company Mylan N.V. and others engaged in anticompetitive and unfair business conduct in its sale and marketing of the EpiPen Auto-Injector device. Mr. Geller was one of the lead counsel in the *Sony Gaming Networks Data Breach* litigation, which resulted in significant monetary recovery and other benefits to consumers. Mr. Geller was also instrumental in resolving a case against Dannon for falsely advertising the health benefits of yogurt products. In addition, Mr. Geller has extensive experience litigating securities fraud actions. Notably, before devoting his practice to the representation of shareholders and consumers, Mr. Geller defended companies in class action litigation, providing him with an invaluable perspective on the prosecution of cases. Mr. Geller has tried bench and jury trials on both the plaintiffs’ and defendants’ sides and has argued before numerous state, federal and appellate courts throughout the country.

Mr. Geller graduated from the University of Florida with a B.S. degree. He earned his J.D. degree from Emory University School of Law, where he was an Editor of the *Emory Law Journal* and a member of the Order of the Coif. Mr. Geller has been named one of “Florida’s Top Lawyers” by *Law & Politics*, one of the “Nation’s Top 40 Under 40” by *The National Law Journal*, one of Florida’s “Legal Elite” by *Florida Trend* magazine, and one of “Florida’s Most Effective Lawyers” by American Law Media’s *Daily Business Review*. In 2017, Mr. Geller was named “Best Lawyer in America” by *Best Lawyers*[®].

Mr. Geller is admitted to practice in the following jurisdictions: the State of Florida (1993); the United States Supreme Court (2007); the United States Courts of Appeals for the Fifth (2006) and Eleventh (1995) Circuits; the United States District Courts for the Northern (2011), Middle (1994), and Southern (1994) Districts of Florida; the District of Colorado (1999); and the Eastern District of Michigan (2015).

Patrick J. Coughlin. Mr. Coughlin is Of Counsel to the firm and is based in the San Diego office. Mr. Coughlin helped end the Joe Camel ad campaign, which used a cartoon camel to target children, and secured a \$12.5 billion recovery for various cities and counties of California in the landmark 1998 state settlement with the tobacco companies. He has been lead counsel for several major securities matters, including one of the earliest and largest class action securities cases to go to trial, *In re Apple Computer Sec. Litig.* Additional prominent securities class actions prosecuted by Mr. Coughlin include the *Enron* litigation, in which \$7.2 billion was recovered, the *Qwest* litigation, in which a \$445 million recovery was obtained, and the *HealthSouth* litigation, in which a \$671 million recovery was obtained. Mr. Coughlin argued before the United States Supreme Court on behalf of shareholders in *Dura Pharms., Inc. v. Broudo*, 544 U.S. 336 (2005), an important decision concerning loss causation in securities cases. In addition to numerous securities cases, Mr. Coughlin has handled a number of large antitrust cases, including the *Currency Conversion* cases in which \$360 million was recovered for consumers, and the *Private Equity* litigation (*Dahl v. Bain Capital Partners, LLC*), in which \$590.5 million was recovered for investors. Mr. Coughlin has broad experience in the prosecution and trial of securities litigation and other cases possessed by few others in the country, as evidenced by the more than 50 jury and non-jury trials he has handled. Mr. Coughlin was formerly an Assistant U.S. Attorney in the District of Columbia and the Southern District of California, handling complex white-collar fraud matters. During this time, he helped try one of the largest criminal RICO matters ever prosecuted by the United States, *United States v. Brown*, No. 86-3056-SWR (D.D.C.).

Mr. Coughlin graduated from Santa Clara University with a B.S. degree. He earned his J.D. degree from Golden Gate University School of Law. In 2015, Mr. Coughlin was recognized by *The National Law Journal* as an “Antitrust Trailblazer.” From 2014 through 2017, Mr. Coughlin was named “Senior Statesman” by *Chambers USA*. From 2006 through 2017, *U.S. News* recognized Mr. Coughlin in its review of America’s “Best Lawyers.”

Mr. Coughlin is admitted to practice in the following jurisdictions: the State of California (1983); the District of Columbia (1987); the State of New York (2006); the United States Courts of Appeals for the Second (2010), Fifth (2006), Sixth (1999), Seventh (2014), Ninth (1981), Eleventh (1999) and District of Columbia (2008) Circuits; the Northern (1991), Eastern (2006), Central (1989) and Southern (1987) Districts of California; the Southern (2008) and Eastern (2017) Districts of New York; the Northern District of Illinois (2002); and the United States Supreme Court (2003).

Mark J. Dearman. Mr. Dearman is a partner in the firm’s Boca Raton office, where his practice focuses on consumer fraud, securities fraud, mass torts, antitrust, and whistleblower litigation. Mr. Dearman’s recent cases include an action against the NHL involving player concussion injuries, a class action against Sony Gaming Networks concerning a huge data breach of Sony’s PlayStation Network, and the massive consolidated class action concerning

Volkswagen's illegal emissions cheating scandal. Currently, Mr. Dearman is litigating *In re Liquid Aluminum Sulfate Antitrust Litig.*, a case regarding a conspiracy to fix prices for a water treatment chemical, liquid aluminum sulfate, as well as a case against Facebook for using facial recognition software in violation of a state privacy statute. Mr. Dearman is also currently litigating nationwide actions against Walgreens and Rite Aid concerning the pharmacies' practice of overcharging customers who purchase generic prescription drugs using insurance. Prior to joining the firm, Mr. Dearman spent several years defending Fortune 500 companies in all aspects of litigation, with an emphasis in complex commercial litigation, consumer claims, and mass torts (products liability and personal injury). During his 17 years of practice, Mr. Dearman has obtained extensive jury trial experience on the plaintiffs' side, protecting the rights of investors throughout the United States.

Mr. Dearman graduated from the University of Florida with a B.A. degree. He earned his J.D. degree from Nova Southeastern University. Mr. Dearman has been recognized by his peers as being in the top 1.5% of Florida Civil Trial Lawyers as published in *Florida Trend's* Florida Legal Elite.

Mr. Dearman is admitted to practice in the following jurisdictions: the State of Florida (1993); the United States Courts of Appeals for the Eighth (2011), Ninth (2012) and Eleventh (2011) Circuits; the Northern (1996), Middle (1993) and Southern (1993) Districts of Florida; and the Southern District of Texas (2014).

Aelish M. Baig. Ms. Baig is a partner in Robbins Geller's San Francisco office where she specializes in consumer and securities class actions. Ms. Baig has litigated a number of cases through jury trial and has obtained hundreds of millions of dollars in awards and settlements for her clients against corporations such as Wells Fargo, Prudential, and Verizon. Ms. Baig prosecuted an action against Wells Fargo's directors and officers charging the company with robo-signing foreclosure papers so as to mass-process home foreclosures, a practice which contributed significantly to the 2008-2009 financial crisis. The resulting settlement was worth more than \$67 million in cash, corporate preventative measures, and new lending initiatives for residents of cities devastated by Wells Fargo's alleged unlawful foreclosure practices. Ms. Baig also prosecuted an action against Prudential for its failure to pay life insurance benefits to its beneficiaries, obtaining a recovery in excess of \$30 million. She was part of the litigation and trial team in the early termination fee cases against cellphone providers including Sprint and Verizon Wireless and recovered more than \$50 million for consumers. Additionally, she prosecuted an off-label marketing case against Allergan's Board of Directors for the company's illegal promotion of Allergan's flagship drug Botox for uses not approved by the FDA. In a unanimous 46-page decision, a three-judge Ninth Circuit panel upheld the action finding that the complaint's detailed factual allegations painted a vivid picture that Allergan's Board of Directors was "committed to very aggressive off-label promotion of Botox." *Rosenbloom v. Pyott*, 765 F.3d 1137, 1158 (2014).

Ms. Baig graduated from Brown University with a B.A. degree. She earned her J.D. degree from American University. Ms. Baig is admitted to practice in the following jurisdictions: the State of California (1999); the United States Court of Appeals for the Ninth Circuit (1999); the Northern (1999) and Central (2010) Districts of California; and the United States Supreme Court (2011).

Shawn A. Williams. Mr. Williams is the managing partner of the firm's San Francisco office and is also a member of the firm's Management Committee. Mr. Williams, whose practice focuses on securities class actions, has served as lead counsel in dozens of securities actions, including: *In re Krispy Kreme Doughnuts, Inc. Sec. Litig.* (\$75 million recovery); *Cadence Design Systems Inc. Sec. Litig.* (\$38 million recovery); *UT Starcom Inc. Sec. Litig.* (\$35 million recovery); and *City of Sterling Heights v. Prudential Financial Inc.* (\$33 million recovery). As lead counsel, Mr. Williams has also secured tens of millions of dollars in cash recoveries and the implementation of comprehensive corporate governance enhancements in shareholder derivative actions. *See, e.g., In re McAfee, Inc. Derivative Litig., The Home Depot, Inc. Derivative Litig., and KLA-Tencor Shareholder Derivative Litig.* Mr. Williams is currently serving as lead counsel in *In re Medtronic, Inc. Sec. Litig.*, where he is working with the Hawaii Attorney General's Office, *City of Westland Police and Fire v. MetLife Inc.*, and *Buelow v. Alibaba Group Holding Limited*. Prior to joining the firm, Mr. Williams was a prosecutor in the Manhattan District Attorney's Office where he tried more than 20 cases to verdict. Currently, Mr. Williams is a part of the team of attorneys litigating a case against Facebook for using facial recognition software in violation of a state privacy statute.

Mr. Williams earned his B.A. degree from The State University of New York at Albany and his J.D. degree from the University of Illinois. Mr. Williams is admitted to practice in the following jurisdictions: the State of California (2001); the State of New York (1996); the United States Courts of Appeals for the Third (2015) and Ninth (2001) Circuits; the Northern (2001), Eastern (2014) and Central (2007) Districts of California; the District of Colorado (2009); and the Southern (2004) and Eastern (2004) Districts of New York.

Rachel L. Jensen. Ms. Jensen is a partner in Robbins Geller's San Diego office. Her practice focuses on consumer, antitrust and securities fraud class actions. Ms. Jensen has played a key role in recovering billions of dollars for individuals, government entities, and businesses injured by fraudulent schemes, anti-competitive conduct, and hazardous products placed in the stream of commerce. Ms. Jensen was one of the lead attorneys who secured a historic recovery on behalf of Trump University students nationwide. Ms. Jensen has recovered more than \$800 million for clients, and secured comprehensive corporate governance enhancements that are a win-win for shareholders and society alike. *See, e.g., City of Westland Police & Fire Ret. Sys. v. Stumpf*, No. 3:11-cv-02369-SI (N.D. Cal.) (a "robo-signing" relief case where Wells Fargo paid \$67 million in homeowner down-payment assistance and credit counseling for cities hardest hit by the foreclosure crisis among other things).

Ms. Jensen was named a "Top Woman Lawyer" by the *Daily Journal* and was named a "Leading Lawyer in America" by *Lawdragon*. Prior to joining the firm, Ms. Jensen clerked for the Honorable Warren J. Ferguson on the Ninth Circuit Court of Appeals.

Ms. Jensen earned a B.A. degree from Florida State University, where she was a member of Phi Beta Kappa, and graduated *cum laude*. Ms. Jensen received her J.D. degree from Georgetown University Law School, where she served as Inaugural Editor-in-Chief of the First Annual Review of Gender and Sexuality Law, a publication of the Georgetown *Journal of Gender and the Law*. She also taught Street Law at a public high school in Washington, D.C.

Ms. Jensen is admitted to practice in the following jurisdictions: the State of California (2000); the United States Courts of Appeals for the Sixth (2015), Seventh (2015), Eighth (2011) and Ninth (2010) Circuits; the Northern (2004), Eastern (2001), Central (2004) and Southern (2004) Districts of California; and the Northern District of Illinois (2008).

Thomas E. Egler. Tom Egler is a partner in Robbins Geller's San Diego office and focuses his practice on representing clients in major complex, multidistrict litigation, such as *Lehman Brothers*, *Countrywide Mortgage Backed Securities*, *WorldCom*, *AOL-Time Warner* and *Qwest*. From 1995 through 1997, he served as a clerk for Hon. Donald E. Ziegler, then Chief Judge of the Western District of Pennsylvania. He is a member of the Pennsylvania, New York and California state bars. He has represented institutional investors both as plaintiffs in individual actions and as lead plaintiffs in class actions. Mr. Egler also serves as a Lawyer Representative to the Ninth Circuit Judicial Conference from the Southern District of California. Mr. Egler's vast experience involving multidistrict litigation will allow him to provide the Team with strategic insight with regard to multidistrict litigation proceedings, and will help him understand the County's specific needs.

Mr. Egler graduated from Northwestern University with a B.A. degree in 1989, and earned his J.D. degree from the Catholic University Columbus School of Law in Washington D.C. in 1995, serving as Associate Editor of the *Catholic University Law Review*.

Mr. Egler is admitted to practice in the following jurisdictions: the State of Pennsylvania (1996); the State of California (1997); the State of New York (2010); the Western District of Pennsylvania (1996); the United States Courts of Appeals for the Second (2015), Third (1997), Ninth (2014) and Eleventh (2000) Circuits; the Northern (1998), Central (2001) and Southern (1997) Districts of California; the District of Columbia (2003); the Southern District of New York (2013); and the United States Supreme Court (2017).

Matthew S. Melamed. Mr. Melamed is a partner in Robbins Geller's San Francisco office, where he focuses on complex securities litigation and whistleblower representation. Since joining the firm, he has been a member of litigation teams responsible for substantial investor recoveries, including *Jones v. Pfizer* (S.D.N.Y.), *In re St. Jude Medical, Inc. Sec. Litig.* (D. Minn.), and *Oklahoma Police Pension & Retirement System v. Sientra, Inc.* (Cal. Super. Ct., San Mateo Cty.). In *Pfizer*, Mr. Melamed was a member of the initial case team that drafted the complaint, which alleged that the company had deceived investors regarding its off-label marketing scheme related to the branded drugs Bextra, Geodon, Zyvox, and Lyrica. He was also part of the team that briefed, argued, and defeated the company's motion to dismiss, successfully moved for class certification, and engaged in discovery, including the review and analysis of some of the 30 million documents produced, and deposing a former manager. This experience has prepared Mr. Melamed to vigorously represent the County in litigation against the manufacturers and distributors of opioid pharmaceuticals. Mr. Melamed has also contributed to the firm's appellate work, including in *Mineworkers' Pension Scheme, British Coal Staff Superannuation v. First Solar, Inc.* (9th Cir.) and *China Development Industrial Bank v. Morgan Stanley & Co. Incorporated* (N.Y. App. Div.).

Mr. Melamed is admitted to practice in the following jurisdictions: the State of California (2008); the United States Courts of Appeals for the Third (2010) and Tenth (2009) Circuits; and the Northern (2010) and Central (2012) Districts of California.

Dory P. Antullis. Ms. Antullis is an associate in Robbins Geller's Boca Raton office. Her practice focuses on complex class actions, including securities, corporate governance, and consumer fraud litigation. Ms. Antullis' recent cases include *In re National Hockey League Players' Concussion Injury Litig.*, *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, and *In re Ford Fusion and C-MAX Fuel Economy Litig.*, an action against Ford Motor Company for engaging in a deceptive marketing campaign regarding the fuel economy of its hybrid vehicles. As a result of her experience litigating cases involving deceptive marketing practices utilized by defendants in order to drive profits, Ms. Antullis will be able to provide insight regarding the deceptive conduct of the manufacturers and distributors of opioid pharmaceuticals. Ms. Antullis has been admitted to practice in the State of Florida since 2004.

Lea M. Bays. Ms. Bays is Of Counsel in the firm's San Diego office. Ms. Bays will serve as E-Discovery Counsel to the County. Ms. Bays focuses on e-discovery issues, from preservation through production, and provides counsel to the Firm's multi-disciplinary, e-discovery team consisting of attorneys, forensic analysts and database professionals. Ms. Bays is an active member of The Sedona Conference and is a frequent panelist at various e-discovery conferences, speaking on topics such as the 2015 Amendments to the Federal Rules of Civil Procedure, technology-assisted review and attorney competence in electronic discovery. Through her role as counsel to the e-discovery team, Ms. Bays is very familiar with the various stages of e-discovery, including identification of relevant electronically stored information, data culling, predictive coding protocols, privilege and responsiveness reviews, as well as having experience in post-production discovery through trial preparation. Through speaking at various events, she is also a leader in shaping the broader dialogue on e-discovery issues. Ms. Bays was recently part of the litigation team that earned the approval of a \$131 million settlement in favor of plaintiffs in *Bennett v. Sprint Nextel Corp.* The settlement, which resolved claims arising from Sprint Corporation's ill-fated merger with Nextel Communications in 2005, represents a significant recovery for the plaintiff class, achieved after five years of tireless effort by the Firm. As a result of Ms. Bays' experience, she would serve as invaluable resource as counsel regarding e-discovery issues such as client document collection, e-discovery protocols, search methodologies and discovery rules and case law. Ms. Bays is admitted to practice in the States of California and New York.

Christine N. Milliron. Ms. Milliron is Robbins Geller's Director of E-Discovery and Litigation Support. She has spent over 15 years at the firm and has overseen the e-discovery process in some of the firm's most complex cases. She was an early adopter of analytics, has spoken on best practices throughout the EDRM, holds multiple Relativity certifications, is a member of Women in eDiscovery and is on the Steering Committee for the San Diego Chapter of the Relativity User Group. Ms. Milliron's experience has given her the insight to provide litigation support and technical consulting to counsel on all phases of the e-discovery process.

If you have any questions or require any additional information, please do not hesitate to contact us. Thank you for your consideration.

DATED: March 12, 2018

EXHIBIT 1

A. Lead Positions in MDLs

Lieff Cabraser

1. *In re Volkswagen ‘Clean Diesel’ Marketing, Sales Practices, and Products Liability Litig.*, MDL No. 2672 (N.D. Cal.) – Lieff Cabraser Founding Partner **Elizabeth J. Cabraser** was appointed³ Lead Counsel and Chair of the 22-member Plaintiff Steering Committee (“PSC”). Robbins Geller Founding Partner **Paul Geller** was also appointed to the PSC.
2. *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Prods. Liab. Litig.*, MDL No. 2777 (N.D. Cal.) - **Elizabeth J. Cabraser** was appointed sole Lead Counsel and chair of the Plaintiffs’ Steering Committee;
3. *In re General Motors Ignition Switch Defect Injury Lawsuits*, MDL No. 2543 (S.D.N.Y.) – **Elizabeth J. Cabraser** appointed Co-Lead Plaintiffs’ Counsel;
4. *In re Stryker Metal Hip Implant Litig.*, MDL No. 2441 (D. Minn.) – Wendy R. Fleishman appointed Co-Lead Counsel;
5. *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Prods. Liab. Litig.*, MDL No. 2151 (C.D. Cal.) – **Elizabeth J. Cabraser** was appointed Co-Lead Counsel for Plaintiffs that were physically injured;
6. *In re Imprelis Herbicide Marketing, Sales Practices and Prods. Liab. Litig.*, MDL No. 2284 (E.D. Pa.) - Lieff Cabraser served as Co-Lead Counsel;
7. *In re Whirlpool Front Loading Washer Prods. Liab. Litig.*, MDL 2001 (N.D. Ohio) – Lieff Cabraser Partners Jonathan Selbin and **Mark P. Chalos** were appointed Co-Lead Counsel;
8. *In Re Yamaha Motor Corp. Rhino ATV Prods. Liab. Litig.*, MDL No. 2016 (W.D. Ky.) - **Elizabeth J. Cabraser** was appointed Plaintiffs’ Lead Counsel;
9. *In re ConAgra Prods. Liab. Litig.*, MDL No. 1845 (N.D. Ga.) - **Elizabeth J. Cabraser** was appointed Plaintiffs’ Lead Counsel;

³ Where the entry indicates individual was appointed to the position, the appointment was made by the MDL Court.

10. *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (N.D. Cal.) - Lief Cabraser served as Court-appointed Co-Lead Counsel for direct purchasers;
11. *In re Ameriquest Mortgage Co. Mortgage Lending Practices Litig.*, MDL No. 1715 (N.D. Ill.) - Lief Cabraser served as Co-Lead Counsel for borrowers
12. *In re Tri-State Crematory Litig.*, MDL No. 1467 (N.D. Ga.) -**Elizabeth J. Cabraser** was appointed Plaintiffs' Lead Counsel/Class Counsel;
13. *In re Buspirone Antitrust Litig.*, MDL No. 1413 (S.D. N.Y.) - Lief Cabraser served as Plaintiffs' Co-Lead Counsel;
14. *In re Providian Financial Corp. Credit Card Terms Litig.*, MDL No. 1301 (E.D. Pa.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Co-Lead Counsel;
15. *In re American Family Bus. Prac. Litig.*, MDL No. 1235 (D. N.J.) - **Elizabeth J. Cabraser** served as Co-Lead Counsel for a nationwide class of persons;
16. *In re Compact Disc Antitrust Litig.*, MDL No. 1216 (C.D. Cal.) - Lief Cabraser served as Co-Lead Counsel for the direct purchasers;
17. *In re Toys 'R' Us Antitrust Litig.*, MDL No. 1211 (E.D. N.Y.) - Lief Cabraser served as Co-Lead Counsel representing a class of direct purchasers (consumers);
18. *In re Synthroid Marketing Litig.*, MDL No. 1182 (N.D. Ill.) - Lief Cabraser served as Co-Lead Counsel;
19. *In re Travel Agency Commission Antitrust Litig.*, MDL No. 1058 (D. Minn.) - Lief Cabraser served as Co-Lead Counsel for a certified class of U.S. travel agents;
20. *In re Felbatol Products Liability Litig.*, MDL No. 1048 (N.D. Cal.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Liaison Counsel and served as Plaintiffs' Lead Class Counsel;
21. *Blood Factor VIII And Factor IX Litig.*, MDL No. 986 (D. Ill.) – Lief Cabraser was appointed Plaintiffs' Lead Counsel of the “second generation” Blood Factor MDL Litigation
22. *In re General Motors Corp. Pick-Up Fuel Tank Prods. Liab. Litig.*, MDL No. 961 (E.D. Pa.) - Lief Cabraser served as Court-appointed Co-Lead Counsel representing a class of 4.7 million plaintiffs (consumer protection);

23. *In re Precious Metals Securities Litig.*, MDL No. 904 (C.D. Cal.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Lead Counsel;
24. *In re First Capital Holdings Corp. Financial Products Securities Litig.*, MDL No. 901 (C.D. Cal.) - **Elizabeth J. Cabraser** served as Co-Lead Counsel;
25. *In re First American Center Partnerships Securities Litig.*, MDL No. 868 (S.D.N.Y.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Lead Counsel;
26. *In re Cordis Pacemaker Product Liability Litig.*, MDL No. 850 (S.D. Ohio) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Co-Lead Counsel;
27. *In re Granada Partnerships Securities Litig.*, MDL No. 837 (S.D. Tex.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Co-Lead Counsel;
28. *In re FPI/Agretech Securities Litig.*, MDL No. 763 (D. Hawai'i) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Co-Lead Counsel and served as Lead Class Counsel;
29. *In re United Energy Corporation Solar Energy Module Securities Litig.*, MDL No. 726 (C.D. Cal.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Lead Counsel; and
30. *In re Cable/Tel. Corp. and Entities Securities Litig.*, MDL No. 619 (E.D. Pa.) - **Elizabeth J. Cabraser** was appointed Plaintiffs' Co-Lead Counsel.

Robbins Geller

1. *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices & Antitrust Litig.*, MDL No. 2785 (D. Kan.) – **Paul Geller** was appointed Co-Lead Counsel;
2. *In re National Hockey League Players' Concussion Injury Litig.*, MDL No. 2551 (D. Minn.) – Robbins Geller was appointed Co-Lead Counsel;
3. *In re Aluminum Warehousing Antitrust Litig.*, MDL No. 2481 (S.D.N.Y.) – Robbins Geller was appointed Co-Lead Counsel;
4. *In re Ford Fusion and C-Max Fuel Economy Litig.*, MDL No. 2450 (S.D.N.Y.) – Robbins Geller was appointed Co-Lead Counsel;
5. *In re Apple iPhone 4 Products Liability Litig.*, MDL No. 2188 (N.D. Cal.) – Robbins Geller was appointed Co-Lead Counsel
6. *In re Aftermarket Automotive Lighting Products Antitrust Litig.*, MDL No.

- 2007 (C.D. Cal.) – Robbins Geller was appointed Co-Lead Counsel;
7. *In re Aqua Dots Products Liability Litig.*, MDL No. 1940 (N.D. Ill.) – Robbins Geller was appointed Co-Lead Counsel.
 8. *In re Webloyalty.com, Inc. Marketing & Sales Practices Litig.*, No. No. MDL 1820 (D. Mass.) – Robbins Geller was appointed Co-Lead Counsel;
 9. *In re Mattel, Inc., Toy Lead Paint Prods. Liab. Litig.*, MDL, 1897 (C.D. Cal.) – Robbins Geller was appointed Co-Lead Counsel;
 10. *In re Pet Food Prods. Liability Litig.*, MDL 1850, No. 07-cv-02867 (D.N.J.) – Robbins Geller was appointed Co-Lead Counsel;
 11. *In re Digital Music Antitrust Litig.*, MDL No. 1780 (S.D.N.Y.) – Robbins Geller was appointed Co-Lead Counsel; and
 12. *In re Foreign Currency Conversion Fee Antitrust Litig.*, MDL No. 1409 (S.D.N.Y.) - Robbins Geller was appointed Co-Lead Counsel.

B. Plaintiff Steering/Executive Committees

Lieff Cabraser

1. *In Re Abilify (Aripiprazole) Prods. Liab. Litig.*, MDL No. 2734 (N.D. Fla.) – Lieff Cabraser partner **Lexi J. Hazam** was appointed to the Plaintiffs’ Executive Committee (“PEC”) and Co-Chairs the Science and Expert Sub-Committee;
2. *In Re Generic Pharmaceuticals Pricing Antitrust Litig.*, MDL No. 2724 (E.D. Pa.) – **Elizabeth Cabraser** was appointed to the End-Payer PSC;
3. *In re Bard IVC Filters Prods. Liab. Litig.*, MDL No. 2641 (D. Ariz.) - Wendy R. Fleishman serves on the PEC;
4. *In Re Zofran (Ondansetron) Prods. Liab. Litig.*, MDL No. 2657 (D.Mass.) - Lieff Cabraser partners Wendy R. Fleishman and Sarah R. London were both appointed to the PSC;
5. *In re Benicar (Olmesartan) Prods. Liab. Litig.*, MDL No. 2606 (D. N.J.) - **Lexi J. Hazam** was appointed to the PSC and serves as the Co-Chair Plaintiffs’ Science and Experts Committee.
6. *In re Takata Airbag Litig.*, MDL No. 2599 (S.D. Fl.) - **Elizabeth J. Cabraser** was appointed to the PSC;
7. *In re New England Compounding Pharmacy Inc. Prods. Liab. Litig.*, MDL No. 2419 (D. Mass.) – **Mark P. Chalos** was appointed the Federal-State

Liaison Counsel and to the PSC.

8. *In re Bank of New York Mellon Corp. Foreign Exchange Trans. Litig.*, MDL 2335 (S.D. N.Y.) - **Elizabeth J. Cabraser** was appointed to the three-member Executive Committee;
9. *In re Actos (Pioglitazone) Prods. Liab. Litig.*, MDL No. 2299 (W.D. La.) – Donald C. Arbitblit was appointed to the PSC. He also served on the trial team in the bellwether case *Allen v. Takeda* in which the awarded **\$9 billion** in punitive damages;
10. *In re DePuy Metal Hip Implants Litig.*, MDL No. 2244 (N.D. Tex.) – Wendy R. Fleishman was appointed to the PSC. Robert J. Nelson was appointed to serve on the PSC in the California state court coordinated proceeding.
11. *In re Navistar Diesel Engine Prods. Liab. Litig.*, MDL No. 2223 (N.D. Ill) – **Mark P. Chalos** was a court appointed member of PSC, and Co-Chair of the Plaintiffs’ Expert Committee
12. *In re Oil Spill by the Oil Rig “Deepwater Horizon” in the Gulf of Mexico*, MDL No. 2179 (E.D. La.) – **Elizabeth J. Cabraser** serves on the Court-appointed PSC;
13. *In re Checking Account Overdraft Litig.*, MDL No. 2036 (S.D. Fl.) - Loeff Cabraser serves on the PEC;
14. *In re Chase Bank USA, N.A. “Check Loan” Contract Litig.*, MDL No. 2032 (N.D. Cal.) - Loeff Cabraser served as Plaintiffs’ Liaison Counsel and on the PEC;
15. *Vytorin/Zetia Marketing, Sales Practices & Prods. Liab. Litig.*, MDL No. 1938 (D. N.J.) - **Elizabeth J. Cabraser** was appointed to the Executive Committee of the PSC;
16. *In re ReNu With MoistureLoc Contact Lens Solution Prods. Liab. Litig.*, MDL No. 1785 (D. S.C.) - Wendy R. Fleishman served on the PEC;
17. *In re Guidant Implantable Defibrillators Prods. Liab. Litig.*, MDL No. 1708 (D. Minn.) - **Elizabeth J. Cabraser** was appointed to the Plaintiffs’ Lead Counsel Committee;
18. *In re Bextra/Celebrex Marketing Sales Practices and Prods. Liab. Litig.*, MDL No. 1699 (N.D. Cal.) - **Elizabeth J. Cabraser** was appointed Plaintiffs’ Liaison Counsel and the PSC which she chaired;
19. *In re Vioxx Prods. Liab. Litig.*, MDL No. 1657 (E.D. La.) – **Elizabeth J. Cabraser** was appointed to the Plaintiffs’ Steering Committee. Donald C.

Arbitblit and Jennifer Gross were also on the trial team the bellwether case, *Barnett v. Merck*;

20. *In re Neurontin Marketing and Sales Practices Litig.*, MDL No. 1629 (D. Mass.) – **Elizabeth J. Cabraser** served on the Plaintiffs’ Steering Committee;
21. *In re Baycol Prods. Litig.*, MDL No. 1431 (D. Minn.) – **Elizabeth J. Cabraser** appointed member of the PSC and served on the Executive Committee of the PSC;
22. *In re Domestic Airline Travel Antitrust Litig.*, MDL No. 1404 D.D.C.) – **Elizabeth Cabraser** was appointed to the three-member Plaintiffs’ Executive Committee overseeing this multidistrict airline price-fixing litigation;
23. *In re Bridgestone/Firestone Tires Prods. Liab. Litig.*, MDL No. 1371 (S.D. Ind.) – **Elizabeth Cabraser** was appointed to the Class PEC and served as Class Counsel;
24. *In re Diet Drugs (Phentermine / Fenfluramine / Dexfenfluramine) Prods. Liab. Litig.*, MDL No. 1203 (E.D. Pa.) – **Elizabeth J. Cabraser** was a member of the Court-appointed Plaintiffs’ Management Committee;
25. *In re Ford Ignition Prods. Liab. Litig.*, MDL No. 1112 (D.N.J.) – **Elizabeth J. Cabraser** was appointed to the PEC;
26. *In re Teletronics Pacing Systems Inc., Accufix Atrial “J” Leads Prods. Liab. Litig.*, MDL No. 1057 (S.D. Ohio) – **Elizabeth J. Cabraser** was appointed to the PSC;
27. *In re Copley Pharmaceutical, Inc., “Albuterol” Prods. Liab. Litig.*, MDL No. 1013 (D. Wyo.) – **Elizabeth J. Cabraser** was appointed to the PSC;
28. *In re Silicone Gel Breast Implants Prods. Liab. Litig.*, MDL No. 926 (N.D. Ala.) – **Elizabeth J. Cabraser** was appointed to the PSC, and served as one of five members of the negotiating committee;
29. *In re ACC/Lincoln Savings Securities Litig.*, MDL No. 834 (D. Ariz.) – **Elizabeth J. Cabraser** was appointed to the PSC;
30. *In re Air Disaster Near Honolulu, Hawaii on February 24, 1989*, MDL No. 807 (N.D. Cal.) - **Elizabeth J. Cabraser** was appointed Plaintiffs’ Liaison Counsel
31. *Castano v. American Tobacco*, No. 94-1044 (N.D. La.) - **Elizabeth J. Cabraser** served on the PEC; Chair, Law Committee; and

32. *In re First Commodity Corp. of Boston Customer Accounts Litig.*, MDL No. 713 (D. Mass.) - **Elizabeth J. Cabraser** was appointed to the PSC
33. *In re Holocaust Victims Assets Litig.*, (S.D.N.Y.) – Lief Cabraser was appointed to the Plaintiffs’ Executive Committee; and
34. *In re the Exxon Valdez*, Case No. A89-095 Civil (Consolidated) (D. Alaska) - Lief Cabraser was appointed Plaintiffs’ Class Counsel.

Robbins Geller

1. *In re Fieldturf Artificial Turf Marketing & Sales Practices Litig.*, MDL No. 2779 (D.N.J.) – **Mark Dearman** was appointed to the Plaintiff Steering Committee (“PSC”);
2. *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices & Products Liability Litig.* MDL No. 2777 (N.D. Cal.) – **Rachel Jensen** was appointed to the PSC;
3. *In re Yahoo! Customer Data Sec. Breach Litig.*, MDL No. 2752 (N.D. Cal.) - Robbins Geller was appointed PSC
4. *In re Liquid Aluminum Sulfate Antitrust Litig.*, MDL No. 2687 (D.N.J.) - Robbins Geller was appointed to the PSC;
5. *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, & Prods. Liab. Litig.*, MDL No. 2672 (N.D. Cal.) – **Paul Geller** was appointed to the PSC;
6. *In re Treasuries Sec. Auction Antitrust Litig.*, MDL No. 2673 (S.D.N.Y.) – Robbins Geller was appointed to the PSC;
7. *In re Lidoderm Antitrust Litig.*, MDL No. 2521 (N.D. Cal.) – Robbins Geller was appointed to the PSC;
8. *In re Aggrenox Antitrust Litig.*, MDL No. 2516 (D. Conn.) – Robbins Geller was appointed to the PSC;
9. *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.*, MDL No. 2258 (S.D. Cal.) – **Paul Geller** was appointed to the PSC;
10. *In re Pom Wonderful LLC Marketing & Sales Practices Litig.*, MDL No. 2199 (C.D. Cal.) – Robbins Geller was appointed to the PSC; and
11. *In re NASDAQ Market-Makers Antitrust Litig.*, MDL No. 1023 (S.D.N.Y.) - Robbins Geller was appointed to the PSC.