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11 *Class Counsel*

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SANTA CLARA

14 MATT WOLTHER, Individually and on) Lead Case No. 18CV329690
15 Behalf of All Others Similarly Situated,) (Consolidated with No. 18CV332463 and
) No. 18CV332644
16 Plaintiff,)
) CLASS ACTION
17 vs.)
)
18 SHUBHAM MAHESHWARI, et al.,) DECLARATION OF GUILLAUME BUELL
) FILED ON BEHALF OF THORNTON LAW
) FIRM LLP IN SUPPORT OF APPLICATION
19 Defendants.) FOR AWARD OF ATTORNEYS' FEES AND
) EXPENSES

20
21 DATE: April 21, 2022
22 TIME: 1:30 p.m.
23 JUDGE: Hon. Sunil R. Kulkarni
24 DEPT: 1

25
26
27
28 Date Action Filed: June 8, 2018

1 I, Guillaume Buell, declare as follows:

2 1. I am a Partner of Thornton Law Firm LLP (the "Firm"). I submit this declaration in
3 support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in
4 connection with services rendered in the above-entitled action (the "Action").

5 2. The Firm is counsel of record for plaintiff Iron Workers District Council of New
6 England Pension Fund and additional counsel to Plaintiffs in the consolidated action.

7 3. The information in this declaration regarding my Firm's time and expenses is taken from
8 time and expense records prepared and maintained by the Firm in the ordinary course of business.
9 These records were reviewed to confirm both their accuracy and reasonableness. During this review,
10 some reductions were made to time and expenses in the exercise of billing judgment. As a result of this
11 review and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation and
12 the expenses for which payment is sought are reasonable in amount and were necessary for the effective
13 and efficient prosecution and resolution of the Action. In addition, I believe that the time and expenses
14 are all of a type that would normally be charged to a fee-paying client in the private legal marketplace,
15 based on my experience, which includes previously representing fee-paying clients while in private
16 practice.

17 4. After the adjustments referred to above, the number of hours spent on the litigation by
18 my Firm is 447.9. A breakdown of the lodestar is provided in Exhibit A. The schedule attached hereto
19 as Exhibit A is a summary indicating the amount of time spent by attorneys and professional support
20 staff members of my Firm who were involved in the prosecution of the Action, and the lodestar
21 calculation based on my firm's current hourly rates. For personnel who are no longer employed by my
22 Firm, the lodestar calculation is based upon the rates for such personnel in his or her final year of
23 employment by my Firm. The schedule was prepared from the timekeeping records for daily activities
24 that were prepared and maintained by my Firm and the relevant timekeepers in the ordinary course of
25 business. These are available at the request of the Court. Time expended in preparing this application
26 for fees and payment of expenses has not been included in this request. The attorneys and professional
27 staff that worked on this Action for my Firm were employees or partners of the Firm at the relevant
28 times.

1 5. The hourly rates for the attorneys and professional support staff of my Firm included in
2 Exhibit A are my Firm’s securities class action rates. These rates were developed by reviewing, *inter*
3 *alia*, the hourly rates for plaintiff securities class actions firms that work on similar cases as this one and
4 others that my Firm’s securities class action practice is currently litigating, as well as other publicly-
5 available information concerning attorney rates. My Firm’s lodestar figures are based upon these rates,
6 which do not include any expense items. Expense items are recorded separately and are not duplicated
7 in my Firm’s hourly rates.

8 6. My Firm seeks reimbursement of \$16,282.77 in expenses and charges in connection with
9 the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

10 7. The following is additional information regarding certain of these expenses:

11 (a) Filing, Witness and Other Fees: \$359.98. These expenses have been paid for
12 filing and *pro hac vice* fees, attorney service firms or individuals who filed and served the complaint,
13 and for court appearance. The vendors who were paid for these services are set forth in Exhibit C.

14 (b) Transportation & Meals: \$142.33. In connection with the prosecution of this
15 case, the Firm has paid for travel expenses (specifically, mileage and meals) in connection with time
16 spent traveling to and from the Plaintiff Iron Workers’ office for client meetings and deposition. *See*
17 Exhibit D.

18 (c) Deposition Transcripts. One vendor, Veritext, LLC, was paid \$1,166.12 for
19 deposition “realtime” services and transcripts in connection with plaintiff depositions. *See* Exhibit E.

20 (d) E-Discovery Consultants: \$8,047.83. Precision Discovery, Inc. (which later
21 became Trustpoint One) was paid this amount to assist in collecting, processing, and producing Plaintiff
22 Iron Workers’ documents in discovery.

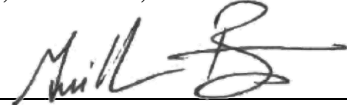
23 (e) Litigation Fund Contribution: My Firm made contributions totaling \$6,325.59 to
24 a Litigation Expense Fund maintained by Robbins Geller Rudman & Dowd LLP to cover shared
25 litigation expenses, including the cost of the mediator that assisted in obtaining the settlement. A
26 detailed breakdown of the expenses paid out of the Litigation Expense Fund is included in Exhibit D to
27

1 the Declaration of James I. Jaconette Filed on Behalf of Robbins Geller Rudman & Dowd LLP in
2 Support of Application for Award of Attorneys' Fees and Expenses.

3 8. The expenses pertaining to this case are reflected in the books and records of this Firm.
4 These books and records are prepared from receipts, expense vouchers, check records and other
5 documents and are an accurate record of the expenses.

6 9. The identification and background of my Firm and its partners is attached hereto as
7 Exhibit F.

8 I declare under penalty of perjury under the laws of the State of California, that the foregoing is
9 true and correct. Executed this 4th day of February, 2022, at Boston, Massachusetts.

10 

11 _____
12 GUILLAUME BUELL

EXHIBIT A

EXHIBIT A

Wolther v. Maheshwari, et al., No. 18CV329690

Thornton Law Firm LLP

Inception through January 31, 2022

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Garrett Bradley	(P)	49.4	\$910	\$44,954.00
Guillaume Buell	(P)	275	\$825	\$226,875.00
Jasmine Howard	(A)	59.3	\$455	\$26,981.50
Madeline Korber	(A)	8.3	\$425	\$3,527.50
Elizabeth McLaughlin	(PL)	55.9	\$225	\$12,577.50
<i>TOTAL</i>		<i>447.9</i>		<i>\$314,915.50</i>

(P) Partner

(A) Associate

(PL) Paralegal

EXHIBIT B

EXHIBIT B

Wolther v. Maheshwari, et al., No. 18CV329690
Thornton Law Firm LLP
Inception through January 31, 2022

<i>CATEGORY</i>		<i>AMOUNT</i>
Filing, Witness and Other Fees		\$359.98
Meals and Transportation		\$142.33
Telephone		\$56.69
Postage		\$99.23
Messenger		\$85.00
Deposition Transcripts		\$1,166.12
Consultants		\$8,047.83
Precision Discovery, Inc.	\$3,695.39	
Trustpoint One	\$4,352.44	
Litigation Fund Contribution		\$6,325.59
<i>TOTAL</i>		<i>\$16,282.77</i>

EXHIBIT C

EXHIBIT C

Wolther v. Maheshwari, et al., No. 18CV329690
Thornton Law Firm LLP
Inception through January 31, 2022

Filing, Witness and Other Fees: \$359.98

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
9/26/2018	Class Action Research & Litigation Support Services, Inc.	Filing and service of Complaint
9/17/2018	State Bar of California	<i>Pro Hac Vice</i> filing fee
3/31/2021	First Legal Network, LLC	Electronic Filing Fee for Notice of Change of Address
3/24/2021	CourtCall, LLC	Appearance for March 25, 2021 Hearing

EXHIBIT D

EXHIBIT D

Wolther v. Maheshwari, et al., No. 18CV329690

Thornton Law Firm LLP

Inception through January 31, 2022

Transportation & Meals: \$142.33

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Guillaume Buell	12/4/2020	Dorchester, MA	Deposition of Client (Iron Workers District Council of N.E. Pension Fund)
Guillaume Buell	12/15/2020	Dorchester, MA	Deposition of Client (Iron Workers District Council of N.E. Pension Fund)

EXHIBIT E

EXHIBIT E

Wolther v. Maheshwari, et al., No. 18CV329690
Thornton Law Firm LLP
Inception through January 31, 2022

Deposition Transcripts: \$1,166.12

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
12/30/2020	Veritext, LLC	Realtime and Transcript of Client Deposition
1/28/2021	Veritext, LLC	Realtime and Transcript of Client Deposition

EXHIBIT F



FIRM RESUMÉ

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Toll Free: 888-491-9726 ♦ Fax: 617-720-2445

9430 W. Olympic Blvd ♦ Suite 400 ♦ Beverly Hills, CA 90212
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www.tenlaw.com

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David C. Strouss	11
Andrew S. Wainwright	12
Marilyn T. McGoldrick.....	13
Brad J. Mitchell	14
Andrea Marino Landry	15
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Leah M. McMorris	17
Brian J. Freer.....	17
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ABOUT THE FIRM

Thornton Law Firm was founded in 1978. It is a leading law firm in Massachusetts, with attorneys representing thousands of clients in a wide variety of plaintiff-side work. The firm's attorneys practice, among other things, in the areas of securities litigation, consumer class actions, False Claims Act suits, toxic torts, and personal injury law.

The Thornton Law Firm's securities litigation attorneys have significant experience bringing lawsuits against public companies on behalf of investors. Thornton's securities litigators have extensive experience litigating under the Securities Act of 1933 and the Securities Exchange Act of 1934. Congress passed both these laws to protect investors from securities fraud. The basic purpose of the 1934 and 1933 regulatory statutes is to protect investor confidence in the securities markets.

For further information about Thornton Law Firm LLP, visit our website, www.tenlaw.com.

Lead Counsel or Class Counsel Appointments In Settled Litigation:

- ◆ *Tung v. Dycom Industries, Inc., et al.*, No. 18-cv-81448 (S.D. Fl.)
- ◆ *In re BrightView Holdings, Inc. Securities Litigation*, No. 2019-07222 (Montgomery County, Penn. Court of Common Pleas)

Lead Counsel or Class Counsel Appointments In Ongoing Litigation:

- ◆ *In re Adient plc Securities Litigation*, No. 18-cv-9116 (S.D.N.Y.)
- ◆ *In re Conduent Inc. Securities Litigation*, No. 19-cv-8237 (D.N.J.)
- ◆ *Wayne County Employees' Retirement System, et al. v. Mavenir, Inc., et al.*, Case No. 18-cv-1229-CFC (D. Del.)

Executive Committee Appointments in Ongoing Litigation:

- ◆ *In re Cloudera, Inc., Securities Litigation*, Lead Case No. 19CV348674 (California Superior Court, County of Santa Clara)
- ◆ *In re Livent Corp. Securities Litigation*, Civil Action No. 190501229 (Court of Common Pleas, Philadelphia County)

Plaintiffs' Counsel In Ongoing Litigation

- ◆ *City of Warwick Municipal Employees Pension Fund v. Restaurant Brands International Inc. et al*, No. 655686/2020 (Supreme Court of New York, County of New York)
- ◆ *Hook v. Casa Systems, Inc., et al.*, No. 654548/2019 (Supreme Court of New York, County of New York)

- ◆ ***Iron Workers Dist. C. of N.E. Pension Fund v. Veeco Instr., et al.***, Case No. 18CV332644 (California Superior Court, County of Santa Clara) (consolidated into *Wolther v. Maheshwari, et al.*, Case No. 18CV329690 (Lead Case))

Thornton Law Firm Lawyers Experience In Resolved Litigation

- ◆ ***Medoff v. CVS Caremark Corporation, et al.***, Case No. 09-cv-554-JNL-PAS (United States District Court, District of Rhode Island) (\$48 million settlement reached against the nation's largest pharmacy retail chain)
- ◆ ***In re Vocera Communications, Inc. Securities Litigation***, Master File No. 3:13-cv-03567 EMC (United States District Court, Northern District of California) (\$9 million recovery secured for investors against a leading provider of mobile communication solutions)
- ◆ ***In re Nu Skin Enterprises, Inc. Securities Litigation***, Case No. 2:14-cv-00033-JNP-BCW (United States District Court, District of Utah) (\$47 million settlement reached in securities class action involving Nu Skin's business conduct in China)
- ◆ ***In re Genworth Financial, Inc. Securities Litigation***, Case No. 14-cv-2392 (AKH) (United States District Court, Southern District of New York) (\$20 million settlement reached with provider of insurance and wealth management services)
- ◆ ***In re Castlight Health, Inc. Shareholder Litigation***, Lead Case No. CIV533203 (Superior Court of the State of California, County of San Mateo) (\$9.5 million settlement with Castlight Inc, in a case alleging that the company's IPO offering documents were false and misleading because they omitted material information, including significant obstacles and delays faced by customers during the implementation of Castlight's technology, resulting in low customer renewal rates and negatively impacting the company's gross margins)
- ◆ ***Noppen v. Innerworkings, Inc., et al.***, Case No. 14-cv-1416 (United States District Court, Northern District of Illinois, Eastern Division) (\$6.025 million settlement in case alleging misleading statements and omissions regarding accounting improprieties)
- ◆ ***Hall v. Rent-A-Center, Inc., et al.***, No. 16-cv-0978 (United States District Court, Eastern District of Texas) (\$11 million settlement in securities class action against Rent-A-Center, Inc., its former CEO Robert D. Davis, and former CFO Guy J. Constant alleging defendants made material misstatements and omissions in violation of the federal securities laws concerning, among other things, the risks and benefits of a new point-of-sale (POS) system that Rent-A-Center began implementing in early 2015)
- ◆ ***In re Biogen Inc. Securities Litigation***, No. 1:15-cv-13189-FDS (United States District Court, District of Massachusetts) (securities class action against Biogen and certain current or former executives relating to misstatements and omissions about its leading MS drug, Tecfidera)

Guillaume Buell

Guillaume Buell is a Partner of Thornton Law Firm. His practice focuses on representing investors and consumers in securities and consumer lawsuits pending in state and federal courts across the country. Guillaume's clients include a diverse array of institutional investors and high-net worth individual investors in both the United States and throughout the world. During his lengthy career, Guillaume has also provided legal counsel to a wide range of Fortune 500 and other corporate clients in the aviation, construction, energy, financial, consumer, pharmaceutical, and insurance sectors in state and federal litigations, government investigations, and internal investigations.

Guillaume has been recognized as a "Super Lawyer" for Securities Litigation by Super Lawyers®, a renowned rating service of outstanding lawyers from more than 70 practice areas who have attained a high degree of peer recognition and professional achievement. He had earlier been selected as a "Rising Star" by the same organization.

In addition to his active litigation practice, Guillaume advises leading pension funds, endowments, and institutional investors on issues related to their investments and corporate governance issues. Guillaume is an active member of the National Association of Public Pension Attorneys, the Canadian Pension & Benefits Institute, the Michigan Association of Public Employee Retirement Systems, the National Association of Shareholder and Consumer Attorneys, and the Georgia Association of Public Pension Trustees.

He is admitted to practice in Massachusetts, New York, and Texas, as well as the Supreme Court of the United States, the United States Courts of Appeals for the First, Second, and Ninth Circuits, and numerous federal district courts across the country.

Guillaume is presently litigating a number of important securities and consumer class actions, including cases on behalf of consumers against Amazon.com and class actions on behalf of the shareholders of Adient PLC, Conduent Inc., Cloudera, Inc., Restaurant Brands, and Veeco, Inc.

Prior to joining Thornton Law Firm, Mr. Buell was a senior associate at Labaton Sucharow in New York, where he handled a wide range of securities class actions. Mr. Buell was also previously an attorney with Hicks Davis Wynn, P.C. in Houston and Cahill Gordon & Reindel LLP in New York.

Mr. Buell received his J.D. from Boston College Law School and was the recipient of the Boston College Law School Award for outstanding contributions to the law school community. He was also a member of the National Environmental Law Moot Court Team, which advanced to the national quarterfinals and received best oralists recognition. While in law school, Mr. Buell was a judicial intern with the Honorable Loretta A. Preska, United States District Court for the Southern District of New York. He spent his third year of law school as an intern with the Government Bureau of the Attorney General of Massachusetts. He received his B.A., cum laude with departmental honors, from Brandeis University.

Guillaume is an Eagle Scout and is fluent in French. He is an active member of his local community, including serving in various roles within his church and as a board member of the Boston chapter of the National Eagle Scout Association.

Mr. Buell is admitted in the following jurisdictions:

- ◆ Commonwealth of Massachusetts
- ◆ State of New York
- ◆ State of Texas
- ◆ Supreme Court of the United States

United States Courts of Appeal:

- ◆ First Circuit
- ◆ Second Circuit

United States District Courts:

- ◆ Colorado
- ◆ Massachusetts
- ◆ Southern District of New York
- ◆ Eastern District of New York
- ◆ Eastern District of Texas
- ◆ Northern District of Texas
- ◆ Southern District of Texas
- ◆ Western District of Texas

Garrett J. Bradley

Garrett Bradley has years of experience helping institutional investors, public pension funds, and individual investors recover losses attributable to corporate fraud. A former state prosecutor, Garrett has been involved in hundreds of securities fraud class action lawsuits that have, in aggregate, recouped hundreds of millions of dollars for investors. Garrett's past and present clients include some of the country's largest public pension funds and institutional investors. Garrett also serves as the Managing Partner of the Thornton Law Firm.

Garrett is a graduate of Boston College High School, Boston College and Boston College Law School. Prior to joining Thornton Law Firm, Garrett worked as an Assistant District Attorney in the Plymouth County District Attorney's office. He also served in the Massachusetts House of Representatives, representing the Third Plymouth District, for 16 years. Garrett is a member of the Massachusetts and the New York Bars.

Garrett is a Fellow of the Litigation Counsel of America, an invitation-only society of trial lawyers comprised of less than 1/2 of 1% of American lawyers. He is a member of the Public Justice Foundation and has been named a Super Lawyer for Litigation - Securities by Super Lawyers from 2017 to present as well as being named a Rising Star, Massachusetts in 2010. He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™. He has been named one of the Top 100 Trial Lawyers in Massachusetts by the American Trial Lawyers Association and is a member of Million Dollar Advocates Forum. Garrett was named a Top Lawyer for 2016 by the Global Directory of Who's Who. The Massachusetts Academy of Trial Attorneys gave him their Legislator of the Year Award in 2007 and the Massachusetts Bar Association named him Legislator of the Year in 2014. He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1995, Massachusetts
- ◆ 2005, New York
- ◆ 1999, U.S. District Court, District of Massachusetts
- ◆ 1999, U.S. Court of Appeals, First Circuit

Education

- ◆ Boston College High School (1988)
- ◆ Boston College (B.A. 1992)
- ◆ Boston College Law (J.D. 1995)

Memberships

- ◆ Massachusetts Bar Association
- ◆ Massachusetts Academy of Trial Attorneys
- ◆ The American Association for Justice
- ◆ Public Justice Foundation
- ◆ Million Dollar Advocates Forum

Lane T. Dubreuil

Lane T. Dubreuil is an associate at Thornton Law Firm. He is a 2014 graduate of Suffolk University with a bachelor of science. He received his Juris Doctor degree from Northeastern University School of Law in 2020.

He concentrates his practice in the firm's securities litigation area, as well as in mesothelioma and asbestos cases. He clerked for the firm while at Northeastern University School of Law.

Admissions

- ◆ 2021, Massachusetts

Education

- ◆ Suffolk University (B.S., Political Science, 2014)
- ◆ Northeastern University (J.D., 2020)

Michael A. Lesser

Mike joined Thornton Law Firm as an associate in 1995 after previously clerking at the firm. He heads the firm's False Claims Act / Whistleblower litigation section, representing individuals that report fraud on the Federal and State governments. While practicing in traditional areas of False Claims litigation, including Medicare and Medicaid fraud, Mike also handles False Claims Act litigation involving finance and bank fraud.

During his time at Thornton Law Firm, Mike has represented clients in all of the firm's practice areas, including victims of exposure to asbestos, glycol ethers, and lead. Mr. Lesser was also part of the firm's litigation team that represented the Commonwealth of Massachusetts in its claims against the tobacco industry. Mike was appointed Special Assistant Attorney General representing the Commonwealth from 1996 through 1999 for this purpose.

Mr. Lesser was named an Up-and-Coming Lawyer by Massachusetts Lawyers' Weekly in 2002. He has also been selected as a Massachusetts Super Lawyers Rising Star for 2010. He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1995, Massachusetts
- ◆ 1997, U.S. District Court, District of Massachusetts
- ◆ 2006, U.S. Court of Appeals, First Circuit

Education

- ◆ Brandeis University (B.A., cum laude, 1992)
- ◆ Boston University (J.D., 1995)

Member

- ◆ American Bar Association

- ◆ The American Association for Justice
- ◆ Taxpayers Against Fraud

Reported Cases

- ◆ *Spirito v. Hyster New Eng., Inc., et al.*, 70 Mass. App. Ct 902, 827 N.E.2d 1160 (2007)

Michael P. Thornton

Michael P. Thornton is founder and chairman of Thornton Law Firm LLP. A nationally recognized expert on toxic tort litigation, Mike graduated from Dartmouth College and Vanderbilt Law School. In the 1970's he successfully undertook the representation of a number of shipyard and construction workers who had developed asbestos-related diseases. Over the years, the firm has grown to become the largest firm in the Northeast representing victims of asbestos and other toxic materials.

The firm has brought justice to workers who contracted cancer and other health issues from exposure to chemicals, defective drugs, and defective products, and to children who have suffered brain damage from lead poisoning and birth defects from chemicals and pesticides to which their parents were exposed.

The Commonwealth of Massachusetts and other states and local government have sought the firm's expertise to address damage from threats to the public health. Multi-million dollar recovery from tobacco companies resulted from the firm's work in these areas.

Mike has lead the firm to support many charitable causes; the most visible and important project involves cancer research. Mr. Thornton was approached by clinicians and researchers at Brigham and Women's Hospital who were interested in studying mesothelioma, a then untreatable and invariably fatal form of asbestos related cancer. After making a multiyear commitment from his own firm, Mr. Thornton helped to recruit several other donors. The program, begun in 2002, has made groundbreaking strides in cancer research generally, and has helped to revolutionize the treatment of mesothelioma, leading to longer survival and better quality of life for victims of this disease.

Mr. Thornton also responded to a call to help establish a place for the families of mesothelioma victims to stay, as the financial impact of staying in hotels can be devastating. The Thornton House was opened in 2008 and houses up to nine families at a time.

Mr. Thornton is a member of the Massachusetts, New Hampshire, and Maine bars. He has published a number of articles on legal subjects and has lectured at the Harvard School of Public Health, Harvard Medical School, and Yale Law School. He is the 2016 recipient of the American Association for Justice's Howard Twigg's award. The Howard Twigg's Award recognizes an AAJ

member of at least 10 years standing whose passion, civility, cordiality, and professionalism reflect the high standards set by Howard Twiggs; and whose courtroom advocacy and distinguished service to AAJ have brought honor to the trial bar and the legal profession. He has been named a Massachusetts Super Lawyer for Class Actions & Mass Torts from 2007 to present. Best Lawyers has named him a Best Lawyer for Mass Torts / Class Actions - Plaintiffs from 2006 to present. In 2016 and 2019 Mike's peers voted him Boston's Best Lawyers Lawyer of the Year for Mass Torts / Class Actions – Plaintiffs. He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1975, New Hampshire
- ◆ 1975, U.S. District Court, District of New Hampshire
- ◆ 1979, Maine
- ◆ 1979, U.S. District Court, District of Maine
- ◆ 1982, Massachusetts
- ◆ 1984, U.S. District Court, District of Massachusetts

Education

- ◆ Vanderbilt University, J.D., 1975
- ◆ Dartmouth College, A.B., 1972

Memberships

- ◆ Massachusetts Bar Association
- ◆ American Bar Association
- ◆ The American Association for Justice

David J. McMorris

Mr. McMorris is a trial lawyer and directs Thornton Law Firm's health care subrogation and workplace injury practice. He is a member of the Massachusetts and New York bars and the American Association for Justice. Mr. McMorris' trial experience has included several jury verdicts in excess of \$1 million dollars in cases involving products liability, construction accidents, toxic exposures, lead paint poisoning, and asbestos exposure. Mr. McMorris was appointed by the federal district court to serve as plaintiff's liaison counsel in asbestos litigation for the United States District Court for the District of Massachusetts and has served in that position since 1993; he was the plaintiff's liaison counsel for the Massachusetts Superior Court's Massachusetts Asbestos Cases Consolidated Docket from 1993 -2017. He is a graduate of the State University of New York and of

Suffolk University Law School. He has been a guest lecturer on latent occupational disease and complex litigation at Tufts University and Boston University Law School.

Mr. McMorris has been named in Best Lawyers in America for many years, as well as a Massachusetts Super Lawyer, and as one of the Top 100 Trial Lawyers by the American Trial Lawyers Association. He is a member of Million Dollar Advocates Forum, has been awarded the highest 10 rating by the lawyer evaluation website avvo.com, and is rated “AV,” the highest available rating from Martindale-Hubbell, a highly respected independent legal rating publisher. The American Lawyer selected him as a 2019 Top Rated Lawyer in Mass Tort Law. He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1983, Massachusetts
- ◆ 1984, New York
- ◆ 1984, U.S. District Court, District of Massachusetts
- ◆ 1984, U.S. Court of Appeals, First Circuit
- ◆ 1988, U.S. Supreme Court

Education

- ◆ State University of New York (B.S. 1976)
- ◆ Suffolk University (J.D., cum laude, 1983)

Memberships

- ◆ New York State Bar Association
- ◆ Massachusetts Bar Association
- ◆ American Association for Justice

David C. Strouss

David Strouss, partner, heads Thornton Law Firm's birth defect litigation involving catastrophic birth defects from parental exposure in occupations such as semiconductor manufacturing and agriculture. He has been a member of the Massachusetts Bar since 1985. Mr. Strouss is an honors graduate of Brown University and a graduate of Northeastern University School of Law. He is a member of the Massachusetts and Boston Bar Associations, the American Association for Justice, and the Massachusetts Academy of Trial Lawyers. Mr. Strouss was Special Assistant Attorney General representing the Commonwealth from 1995 through 1999 in the Tobacco Litigation.

Mr. Strouss was named Environmental Litigation (Toxic) Lawyer of the Year in 2017 by Lawyer Monthly magazine. Mr Strouss prosecuted and successfully resolved some of the country's first

cases involving birth defects caused by glycol ethers and other solvent exposures in the semiconductor industry. He currently represents over 150 plaintiffs with birth defects in the United States and South America due to parental occupational and environment exposures. Mr. Strouss has also litigated cases involving cancer arising from exposure to benzene, solvents and other hazardous chemicals, environmental property damage cases and pharmaceutical drug and medical device cases including Fen-Phen and Vioxx. The American Lawyer selected him as a 2019 Top Rated Lawyer in Mass Tort Law. He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1985, Massachusetts
- ◆ 1986, U.S. District Court, District of Massachusetts

Education

- ◆ Brown University (B.A., with honors, 1978)
- ◆ Northeastern University (J.D., 1985)

Memberships

- ◆ Boston Bar Association
- ◆ Massachusetts Bar Associations
- ◆ The American Association for Justice
- ◆ Massachusetts Academy of Trial Lawyers
- ◆ Massachusetts Coalition of Occupational Safety and Health (MassCOSH)(Co-Chair, Legal Committee)

Andrew S. Wainwright

Andrew Wainwright is a Thornton Law Firm partner and trial attorney. Mr. Wainwright manages the Thornton Law Firm asbestos trial practice. He has successfully litigated hundreds of asbestos cases in the Massachusetts Superior Court. He has also successfully argued cases before the Massachusetts Appeals Court and the Massachusetts Supreme Judicial Court. (*Spellman v. Shawmut Woodworking & Supply, Inc., et al*, 445 Mass. 675 (2006)). He has lectured before nationwide continuing legal education seminars on the subjects of asbestos litigation and the admissibility of expert testimony. Mr. Wainwright is admitted to practice in Massachusetts, New York, the United States District Court of Massachusetts, and the United States First Circuit Court of Appeals. He graduated from Hobart College with a BA in Philosophy and received his Juris Doctorate from Suffolk University cum laude in 1991.

In 2017 he tried and won two of the top three jury trial verdicts in the Commonwealth of Massachusetts, a \$7.5 million award in *Sylvestre v. New England Insulation*, and a \$6.8 million award in *Ross v. New England Insulation*. He is AV Martindale-Hubbell Peer Review Rated, and a Massachusetts Super Lawyer (2004, 2009, 2014-2018). He was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1991, Massachusetts
- ◆ 1992, U.S. District Court, District of Massachusetts
- ◆ 1992, First Circuit Court of Appeals
- ◆ 2005, New York

Education

- ◆ Hobart College (B.A., 1985)
- ◆ Suffolk University (J.D., cum laude, 1991)
- ◆ Memberships
- ◆ Boston Bar Association
- ◆ Massachusetts Bar Association
- ◆ Massachusetts Academy of Trial Attorneys
- ◆ American Association for Justice
- ◆ National Disability Law Center
- ◆ Professional Hockey Players Association, Workers' Compensation Panel

Reported Cases

- ◆ *Spellman v. Shawmut Woodworking & Supply, Inc.*, 445 Mass. 675, 839 N.E.2d 47 (2006)

Marilyn T. McGoldrick

Marilyn McGoldrick concentrates her practice in pharmaceutical and medical device litigation and class actions. Ms. McGoldrick is a graduate of the University of Massachusetts at Amherst and a cum laude graduate of Suffolk University Law School. She is a member of the Massachusetts Academy of Trial Attorneys, the Massachusetts Bar Association and Boston Bar Association (Co-Chair, New Lawyers Section 2000-2001; Steering Committee Member, New Lawyers Section; Membership Committee), and the American Association for Justice. Ms. McGoldrick is Pro Bono counsel for the Central Square Theater, Arlington Underground Railway Theater Company, and an Advisory Board Member, WOT Theater Festival.

She holds a BV® Distinguished™ rating from Martindale-Hubbell, and has been named a Massachusetts Super Lawyer. In 2019 she was named to the Best Lawyers in America list for Personal Injury – Plaintiffs.

She represents clients throughout Massachusetts and across the country. She is admitted to the Massachusetts Bar, the U.S. District Court of Appeals, First Circuit and the U.S. District Court for the District of Massachusetts. She was selected as one of New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell™.

Admissions

- ◆ 1992, Massachusetts
- ◆ 1994, U.S. District Court, District of Massachusetts
- ◆ 1994, U.S. Court of Appeals, First Circuit

Education

- ◆ University of Massachusetts at Amherst (B.A., 1987)
- ◆ Suffolk University (J.D., cum laude, 1992)

Memberships

- ◆ Massachusetts Bar Association
- ◆ Massachusetts Association of Trial Attorneys
- ◆ The American Association for Justice
- ◆ The Women's Bar Association
- ◆ Pro bono Counsel, Central Square Theater, Underground Railroad Theatre Company
- ◆ Advisory Board Member, The Women's Table – June, 2010 – present
- ◆ Advisory Board Member, WOT Theatre Festival
- ◆ Boston Bar Association (Co-Chair, New Lawyers Section; Membership Committee, 1999-2001)

Reported Cases

- ◆ Lawrence v. City of Cambridge, 422 Mass. 396, 664 NE 2d 1 (1996)
- ◆ Town of Middleborough v. Middleborough Gas & Electric, 422 Mass. 583, 664 NE 2d 25

Brad J. Mitchell

Mr. Mitchell is a partner at Thornton Law Firm LLP and joined the firm in 1999. His main practice area is toxic exposure litigation, including cases involving birth defects, cancer, and exposure to

glycol ethers, benzene, solvents, and other hazardous substances. Mr. Mitchell has represented clients who have been exposed to toxic substances working in semiconductor chip manufacturing, printing, parts washing, and other industries and occupations.

Brad J. Mitchell is a graduate of Colby College (B.A., May 1989) and Vermont Law School (J.D. 1998). Mr. Mitchell was a Note Editor for the Vermont Law Review.

Mr. Mitchell is a member of the Massachusetts Bar Association and the Boston Bar Association. He is admitted to the Massachusetts bar, the U.S. District Court for the District of Massachusetts, and the U.S. Court of Appeals for the First Circuit.

Admissions

- ◆ 1998, Massachusetts
- ◆ 2006, U.S. District Court, District of Massachusetts
- ◆ 2006, U.S. Court of Appeals, First Circuit

Education

- ◆ Colby College (B.A., 1989)
- ◆ Vermont Law School (J.D., 1998)

Biography

- ◆ Note Editor, Vermont Law Review

Memberships

- ◆ Boston Bar Association
- ◆ Massachusetts Bar Association
- ◆ The American Association for Justice

Andrea Marino Landry

Andrea Marino Landry is a partner at Thornton Law Firm LLP. She joined the firm as an associate in 2005 after previously clerking at the firm.

During her time at Thornton Law Firm, Ms. Landry has successfully represented clients in a variety of the firm's practice areas, including personal injury litigation, products liability litigation, victims of exposure to asbestos, victims of toxic exposures, including children of workers born with birth defects, and consumer class actions. She represents clients throughout Massachusetts and nationally. She was co-counsel for *Lydon v. Turner & Newall*, a \$9.3 million verdict for a pipefitter who developed peritoneal mesothelioma after exposure to asbestos.

Ms. Landry is a graduate of the College of the Holy Cross (B.A., summa cum laude, 2002) and Boston College Law School (J.D., cum laude, 2005). She was admitted to the Massachusetts bar in 2005 and the United States District Court for the District of Massachusetts in 2006.

Ms. Landry is a member of the Massachusetts Bar Association and American Association for Justice, and she is a member of the board of the Holy Cross Lawyers Association. Ms. Landry has been named a Massachusetts Super Lawyer Rising Star for the years 2013-2019. She was an associate adjunct professor at New England Law | Boston 2013-2014, teaching public health law.

Admissions

- ◆ 2005, Massachusetts
- ◆ 2006, U.S. District Court, District of Massachusetts

Education

- ◆ College of the Holy Cross, (B.A., summa cum laude. 2002)
- ◆ Boston College (J.D., cum laude, 2005)

Memberships

- ◆ Massachusetts Bar Association
- ◆ American Association for Justice
- ◆ Women's Bar Association

Evan R. Hoffman

Evan Hoffman concentrates his practice areas in complex financial fraud class actions, qui tam, and False Claims Act cases. He has successfully represented private whistleblowers and public pension funds in groundbreaking state and federal multi-district litigation against global custodial banks for foreign exchange fraud. In addition to his class action work, Mr. Hoffman represents and has helped obtain substantial settlements for plaintiffs who have contracted mesothelioma as a result of exposure to asbestos. He is involved in the firm's birth defects and farmworker pesticide litigation practice, working for clients exposed to dangerous and unsafe chemicals.

Mr. Hoffman is a graduate of American University in Washington, D.C. (2007) and Suffolk University Law School in Boston, MA (2010). In 2019 he was named a "Rising Star" for Class Action and Mass Torts by Super Lawyers, a rating service of outstanding lawyers from more than 70 practice areas who have attained a high-degree of peer recognition and professional achievement. The National Trial Lawyers named Mr. Hoffman one of the top 39 Trial Lawyers Under the Age of 39 in Massachusetts from 2012 to 2016. He is a member of the American Association for Justice, the Massachusetts Bar Association, and the Boston Bar Association.

Admissions

- ◆ 2010, Massachusetts
- ◆ 2011, U.S. District Court, District of Massachusetts

Memberships

- ◆ American Association for Justice
- ◆ Massachusetts Bar Association

Leah M. McMorris

Leah McMorris is a partner at the Thornton Law Firm LLP in Boston. She has been with the firm since 2005 as a clerk and joined full time as an associate in 2011. Her practice focuses on mesothelioma, toxic exposures, products liability, and catastrophic injury litigation. She has tried several cases in Massachusetts, obtaining significant verdicts and settlements for her clients. In addition to representing victims of mesothelioma exposed to asbestos in the workplace, Ms. McMorris represents mesothelioma clients exposed to asbestos-contaminated cosmetic talc.

Ms. McMorris earned her Bachelor's degree from Fairfield University and her Juris Doctor degree from New England School of Law in 2011. She was admitted to the Massachusetts bar in 2011 and the U.S. District Court for the District of Massachusetts in 2013.

Ms. McMorris is a member of the Massachusetts Bar Association and the American Association for Justice. She teaches yoga sculpt in Boston, enjoys practicing yoga, and is two-time Boston marathon runner.

Admissions

- ◆ 2011, Massachusetts
- ◆ 2013, U.S. District Court, District of Massachusetts

Brian J. Freer

Brian Freer is a partner at Thornton Law Firm and was previously employed as a law clerk with the Firm. He graduated from Villanova University (B.S. Finance, 2008, cum laude) and New York Law School (J.D. 2011). Mr. Freer is admitted to the Massachusetts and New York bars. He concentrates his practice in the Firm's personal injury, products liability, financial and insurance fraud areas, as well as asbestos and mesothelioma claims. Mr. Freer is a member of the Massachusetts Bar Association and the American Association for Justice.

John T. Barrett

Mr. Barrett is a graduate of the University of Maine and the Boston University School of Law. He practiced in New Hampshire until 1982, when he joined Thornton Law Firm. He manages the firm's asbestos and personal injury practice in New Hampshire and Maine.

Admissions

- ◆ 1969, New Hampshire
- ◆ 1997, Massachusetts

Memberships

- ◆ American Association for Justice
- ◆ Massachusetts Bar Association

David Bricker

David Bricker is of counsel to Thornton Law Firm LLP. He manages the firm's California office where his practice focuses on birth injury and asbestos litigation. Mr. Bricker is a graduate of Pitzer College in Claremont, California, where he earned a Bachelor's Degree in Political Science. He received his law degree from Tulane University School of Law in New Orleans, Louisiana. Mr. Bricker is admitted to practice law in the states of California, Illinois, and Massachusetts. In addition, he is admitted to practice before the First Circuit Court of Appeals, the Ninth Circuit Court of Appeals and the United States District Courts for the Northern District of California, the Southern District of California, the Eastern District of California, the Central District of California, the Northern District of Illinois, and the District of Massachusetts.

As a trial lawyer, Mr. Bricker brings to his clients more than twenty-five years of state and federal trial experience in complex civil matters, including toxic exposure litigation, birth injury litigation, asbestos litigation, product liability litigation, medical and professional malpractice litigation, railroad litigation and elder and dependent adult abuse litigation. He has devoted a significant portion of his career to representing catastrophically injured individuals with an emphasis on representing injured children. Mr. Bricker has obtained numerous notable verdicts on behalf of his clients including a \$17 million verdict in favor of a man left paralyzed by the negligence of a hospital's neurosurgeon and a \$32 million verdict in favor of a child severely injured by the negligence of a hospital's delivery room staff. He has also served as class-counsel in national products liability cases, most recently on behalf of nearly 4000 plaintiffs in the Caldera mesh litigation in the United States District Court for the Central District of California.

Bar Admissions

- ◆ State of California, 1992
- ◆ State of Illinois, 2014

- ◆ State of Massachusetts, 2016
- ◆ United States Court of Appeals for the First Circuit
- ◆ United States Court of Appeals for the Ninth Circuit
- ◆ United States District Court, Northern District of California
- ◆ United States District Court, Central District of California
- ◆ United States District Court, Southern District of California
- ◆ United States District Court, Eastern District of California
- ◆ United States District Court, Northern District of Illinois
- ◆ United States District Court, District of Massachusetts

Professional Associations

- ◆ California Bar Association
- ◆ Beverly Hills Bar Association
- ◆ Los Angeles County Bar Association
- ◆ American Association for Justice
- ◆ Professional Negligence Section
- ◆ Railroad Law Section
- ◆ Consumer Attorneys of California
- ◆ Consumer Attorneys Association of Los Angeles

Pro Bono & Community Service

- ◆ Physicians for Peace
- ◆ Bet Tzedek, The House of Justice
- ◆ Pro Bono Representation Panel for the United States District Court for the Central District of California

Patricia M. Flannery

Patricia Flannery is a graduate of Boston College (1979. magna cum laude) and the Northeastern University School of Law (1988). She is admitted to the Massachusetts Bar and the United States District Court for Massachusetts, as well as to the United States Court of Appeals for the First Circuit. Ms. Flannery worked for the firm before attending law school and joined the firm as a partner in 1996. She has worked in the firm's asbestos practice and tried cases in a number of other areas. She was lead trial counsel in *Ortiz del-Valle v. NBA*, winning a \$7.85 million award for sex discrimination in favor of a female referee passed over for hiring by the National Basketball Association.

She is a member of the American Association for Justice and the Massachusetts Bar Association.

Reported cases: Ortiz-Del Valle v. National Basketball Ass'n, 42 F. Supp. 2d 334

Christian Uehlein

Christian Uehlein is of counsel to Thornton Law Firm LLP. He joined the firm as an associate in 2006. Mr. Uehlein is a graduate of Colorado College (B.A. 2002) and New England School of Law (J.D. 2006). He was admitted to the Massachusetts Bar in 2006 and the United States District Court for the District of Massachusetts in 2007. Mr. Uehlein focuses his practice on representing victims of toxic exposures as well as employers and business in insurance premium disputes. Since he joined Thornton Law Firm Mr. Uehlein has represented victims of exposure to asbestos and other toxic chemicals in personal injury lawsuits, including representing families across the country in cases involving catastrophic birth defects suffered by children due to their parents' exposures in occupations such as semiconductor manufacturing and agriculture. He also represents numerous businesses in Massachusetts and other states in class action litigation against insurers for premium overcharges. He has previously litigated cases involving environmental property damage.

Mr. Uehlein a member of the American Association for Justice, Public Justice, and has been selected to The National Trial Lawyers "Top 39 under 39" from 2012 to present.

Admissions

- ◆ 2006, Massachusetts
- ◆ 2007, U.S. District Court, District of Massachusetts
- ◆ 2016, Montana

Education

- ◆ Colorado College (B.A., Political Science, 2002)
- ◆ New England School of Law (J.D. 2006)

Memberships

- ◆ American Association for Justice
- ◆ Public Justice

Jasmine M. Howard

Jasmine Howard is an associate at Thornton Law Firm. She is a 2011 graduate of Boston College with a bachelor of arts in political science. She received her Juris Doctor degree from Northeastern University School of Law in 2017, as well as a Masters in Public Health from Tufts University School of Medicine. She concentrates her practice in the firm's birth defect area, as well as in mesothelioma and asbestos cases. She is a member of the American Association for Justice and the Massachusetts Bar Association.

Admissions:

- ◆ 2017, Massachusetts
- ◆ 2018, United States District Court for the District of Massachusetts
- ◆ Pending, New York

Memberships:

- ◆ American Association for Justice
- ◆ Massachusetts Bar Association

Ginger A. Gibbs

Ginger A. Gibbs is an associate attorney at Thornton Law Firm, LLP. She is a 2007 graduate of the University of New Orleans with Bachelors of Science in both Finance and Business Administration. She earned her Master of Arts in Government from Regent University in 2010.

She graduated from Florida Coastal School of Law in 2014 with a Juris Doctor awarded with pro bono honor distinction for completing over 1,000 hours of pro bono work during law school. Much of this work involved helping combat wounded veterans and gold star families, women in crisis, and human trafficking survivors. She currently volunteers with the Women's Bar Foundation Family Law Project representing survivors of domestic abuse and intimate partner violence.

She concentrates her practice in the firm's drugs and medical devices litigation practice, as well as personal injury cases.

Admissions:

- ◆ 2016, Commonwealth of Massachusetts
- ◆ 2017, United States District Court for the District of Massachusetts

Education:

- ◆ 2007, University of New Orleans, B.S. in Finance and B.S. in Business Administration

- ◆ 2010, Regent University, M.A. in Government
- ◆ 2014, Florida Coastal School of Law, J.D. with pro bono honor distinction

Memberships:

- ◆ American Association for Justice
- ◆ Massachusetts Bar Association
- ◆ Women's Bar Association

AWARDS AND ACCOLADES

US News & World Report / Best Law Firms

US News began ranking firms through Best Lawyers in 2010. Thornton Law Firm has been ranked a national Tier 1 Best Law Firm in Mass Torts & Class Actions since the first edition, in addition to a Tier 1 Boston ranking for Mass Tort Litigation / Class Action and a Tier 1 Boston ranking for Personal Injury Litigation - Plaintiffs.

US News & World Report / Best Lawyers

Michael P. Thornton

David J. McMorris

Marilyn T. McGoldrick

Super Lawyers

Michael P. Thornton

Boston Lawyer of the Year for Mass Torts / Class Actions – Plaintiffs (2016)

Boston Lawyer of the Year for Mass Torts / Class Actions – Plaintiffs (2019)

David J. McMorris

Andrew S. Wainwright

Garrett Bradley

Michael A. Lesser

Marilyn T. McGoldrick

Andrea Marino Landry

Massachusetts Super Lawyers Rising Stars

Andrea M. Landry

Evan Hoffman

Guillaume Buell

Fellow, Litigation Counsel of America

Garrett J. Bradley

New England's 2020 Top Rated Lawyers by ALM Media and Martindale-Hubbell

Marilyn T. McGoldrick

Andrew S. Wainwright

Michael P. Thornton

David C. Strouss

David J. McMorris

Michael A. Lesser

Garrett J. Bradley

Martindale-Hubbell AV Rated

Michael P. Thornton

David J. McMorris

David C. Strouss

Andrew S. Wainwright

Martindale-Hubbell Peer-Review Rated

Michael P. Thornton

David J. McMorris

David C. Strouss

Garrett J. Bradley

Andrew S. Wainwright

Michael A. Lesser

Marilyn T. McGoldrick

Brad J. Mitchell

Christian F. Uehlein

American Association for Justice

Michael P. Thornton, Howard Twiggs Award, 2016

American Trial Lawyers Association

Garrett J. Bradley, Top 100 Trial Lawyers in Massachusetts

Lawyer Monthly Magazine

David C. Strouss, Environmental Litigation (Toxic) Lawyer of the Year (2017)

Million Dollar Advocates Forum

David J. McMorris

Garrett J. Bradley

The National Trial Lawyers Top 40 Trial Lawyers Under Age 40

Evan R. Hoffman

Christian F. Uehlein

1 **DECLARATION OF SERVICE BY EMAIL**

2 I, Marianne Maloney, am and was, at all times herein mentioned, a citizen of the United States
3 and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested
4 party in the within action, and have a business address of 655 West Broadway, Suite 1900, San Diego,
5 California 92101.

6 I hereby declare that on February 7, 2022, I served the attached DECLARATION OF
7 GUILLAUME BUELL FILED ON BEHALF OF THORNTON LAW FIRM LLP IN SUPPORT OF
8 APPLICATION FOR AWARD OF ATTORNEYS’ FEES AND EXPENSES on the parties in the
9 within action by emailing a copy to the addresses below:

10 **COUNSEL FOR PLAINTIFFS:**

NAME	FIRM	EMAIL
James I. Jaconette Ellen Gusikoff Stewart	ROBBINS GELLER RUDMAN & DOWD LLP 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax) <i>Co-Lead Counsel for Plaintiffs</i>	jamesj@rgrdlaw.com elleng@rgrdlaw.com
Francis A. Bottini, Jr. Yury A. Kolesnikov	BOTTINI & BOTTINI, INC. 7817 Ivanhoe Avenue, Suite 102 La Jolla, CA 92037 Telephone: 858/914-2001 858/914-2002 (fax) <i>Co-Lead Counsel for Plaintiffs</i>	fbottini@bottinilaw.com ykolesnikov@bottinilaw.com
David W. Hall	HEDIN HALL LLP Four Embarcadero Center, Suite 1400 San Francisco, CA 94104 Telephone: 415/766-3534 415/402-0058 (fax) <i>Additional Counsel for Plaintiffs</i>	dhall@hedinhall.com
Guillaume Buell	THORNTON LAW FIRM LLP 1 Lincoln Street Boston, MA 02111 Telephone: 617/720-1333 <i>Additional Counsel for Plaintiffs</i>	gbuell@tenlaw.com

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1 **COUNSEL FOR DEFENDANTS:**

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NAME	FIRM	EMAIL
Matthew W. Close Jonathan B. Waxman	O'MELVENY & MYERS LLP 400 South Hope Street, 18th Floor Los Angeles, CA 90071 Telephone: 213/430-6000 213/430-6407 (fax) <i>Attorneys for Defendants</i>	mclose@omm.com jwaxman@omm.com

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7 I declare under penalty of perjury that the foregoing is true and correct. Executed on February
8 7, 2022, at San Diego, California.

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10 _____
11 MARIANNE MALONEY
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