

THE HONORABLE KAREN DONOHUE

SUPERIOR COURT OF WASHINGTON IN AND FOR KING COUNTY

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|--|---|--|
| In re FUNKO, INC. SECURITIES LITIGATION |) | Case No. 17-2-29838-7 SEA |
| |) | (Consol. with Nos. 18-2-01264-3 SEA, 18-2-01582-1 SEA, 18-2-02535-4 SEA, |
| |) | 18-2-08153-0 SEA, 18-2-12229-5 SEA, and |
| This Document Relates To: |) | 18-2-14811-1 SEA) |
| |) | |
| ALL ACTIONS. |) | <u>CLASS ACTION</u> |
| |) | |
| |) | DECLARATION OF THOMAS L. |
| |) | LAUGHLIN, IV FILED ON BEHALF OF |
| |) | SCOTT+SCOTT ATTORNEYS AT LAW |
| |) | LLP IN SUPPORT OF APPLICATION |
| |) | FOR AWARD OF ATTORNEYS' FEES |
| |) | AND EXPENSES |

1 I, Thomas L. Laughlin, IV, declare as follows:

2 1. I am a partner in the firm of Scott+Scott Attorneys at Law LLP (“Scott+Scott”). I
3 am submitting this declaration in support of the application for an award of attorneys’ fees and
4 expenses/charges (“expenses”) in connection with services rendered in prosecuting the securities
5 claims against the Defendants in above-entitled action.

6 2. Scott+Scott is additional counsel of record for Class Representative Carl M.
7 Berkelhammer (“Berkelhammer”).

8 3. The information in this declaration regarding Scott+Scott’s time and expenses is
9 taken from time and expense reports and supporting documentation prepared and/or maintained
10 by Scott+Scott in the ordinary course of business. I am the partner who oversaw and/or conducted
11 the day-to-day activities in the litigation and I reviewed these reports (and backup documentation
12 where necessary or appropriate) in connection with the preparation of this declaration. The
13 purpose of this review was to confirm both the accuracy of the entries as well as the necessity for,
14 and reasonableness of, the time and expenses committed to the litigation. As a result of this review,
15 reductions were made to both time and expenses in the exercise of billing judgment. Based on this
16 review and the adjustments made, I believe that the time reflected in Scott+Scott’s lodestar
17 calculation and the expenses for which payment is sought herein are reasonable and were necessary
18 for the effective and efficient prosecution and resolution of the litigation.

19 4. After the reductions referred to above, the number of hours spent on the litigation
20 by Scott+Scott is 1946.90. A breakdown of the lodestar is provided in Exhibit A. The lodestar
21 amount for attorney/paralegal time based on Scott+Scott’s current rates is \$1,413,012.50. The
22 hourly rates shown in Exhibit A are consistent with hourly rates submitted by Scott+Scott in other
23 securities class actions. Scott+Scott’s rates are set based on periodic analysis of rates charged by
24 firms performing comparable work both on the plaintiff and defense side. For personnel who are
25 no longer employed by Scott+Scott, the “current rate” used for the lodestar calculation is based
26 upon the rate for that person in his or her final year of employment with Scott+Scott.

1
2 5. Scott+Scott seeks an award of \$39,254.46 in expenses and charges in connection
3 with the prosecution of the litigation. Those expenses and charges are summarized by category in
4 Exhibit B.

5 6. The following is additional information regarding these expenses:

6 (a) Filings, Court, & Service of Process: \$3,450.79. These expenses have been
7 paid to the King County Superior Court for filing and *pro hac vice* fees and to Class Action
8 Research, an attorney service firm that handled service of process of the complaints. These
9 expenses also include charges for obtaining copies of court documents.

10 (b) Deposition Reporting & Transcripts: \$2,984.27. These expenses were for
11 court reporting, transcripts, and videographers for Berkelhammer's deposition. The vendor was
12 Veritext Legal Solutions.

13 (c) Litigation Fund Contribution: \$20,000. Scott+Scott contributed to the
14 Litigation Fund maintained by Robbins Geller Rudman & Dowd LLP.

15 (d) Electronic Discovery Platform: \$262.73. Electronic discovery through the
16 Relativity platform used to store, sort, assess, and produce Berkelhammer's documents.

17 (e) Online Legal Research: \$6,816.71. This category includes vendors such as
18 Westlaw and PACER. These resources were used to obtain access to legal research and to cite-
19 check briefs. The charges for these vendors vary depending upon the type of services requested.

20 (f) Photocopies & Printing: \$386.00. Scott+Scott made in-house photocopies,
21 charging \$0.25 per black-and-white page and \$1.00 per color page. Each time an in-house copy
22 machine is used, our billing system requires that a case or administrative billing code be entered
23 and that is how the photocopies were identified as related to this case.

24 (g) Transportation, Hotels, & Meals: \$1,634.09. Scott+Scott paid for travel
25 expenses to prepare Berkelhammer for his deposition and defend him at his deposition.
26

1 (h) Press Releases: \$2,492.00. Scott+Scott issued press releases in connection
2 with advising members of the purported plaintiff class about the pending action.

3 (i) Local Counsel: \$1,227.87. Scott+Scott retained Tousley Brain Stephens
4 PLLC ("Tousley") to serve as local counsel for Scott+Scott and Berkelhammer and assist
5 Scott+Scott, including by performing Washington State-specific legal research, filing pleadings
6 and briefs, and attending court hearings. Tousley's expenses were: (i) photocopies (\$142.20); (ii)
7 Mailing & Messenger (\$381.15); (iii) Legal Research (\$683.88); and (iv) Travel (\$20.64).

8 7. The expenses pertaining to this case are reflected in Scott+Scott's books and
9 records. These books and records are prepared from receipts, expense vouchers, check records,
10 and other documents and are an accurate record of the expenses.

11 8. The identification and background of my firm is attached hereto as Exhibit C.

12 I declare under penalty of perjury under the laws of the State of Washington that the
13 foregoing is true and correct.

14 Executed this 2nd day of May, 2025, at New York, New York.

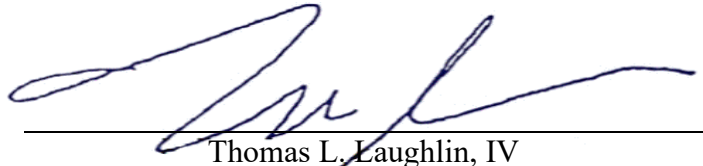
15
16 
17 Thomas L. Laughlin, IV

EXHIBIT A

EXHIBIT A

In re Funko, Inc. Securities Litigation , Case No. 17-2-29838-7 SEA

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Inception through February 12, 2025

| <i>NAME</i> | <i>STATUS</i> | <i>HOURS</i> | <i>RATE</i> | <i>LODSTAR</i> |
|---------------------|---------------|----------------|-------------|-----------------------|
| Thomas Laughlin | P | 161.30 | \$1,150.00 | \$185,495.00 |
| Michael Burnett | P | 35.70 | \$1,400.00 | \$49,980.00 |
| Jeffrey Jacobson | A | 465.10 | \$775.00 | \$360,452.50 |
| Rhiana Swartz | A | 107.70 | \$850.00 | \$91,545.00 |
| Joseph Pettigrew | OC | 31.00 | \$875.00 | \$27,125.00 |
| Darrin Weiss | SA | 209.60 | \$650.00 | \$136,240.00 |
| Julie Lebuticheva | SA | 392.60 | \$675.00 | \$265,005.00 |
| Stephen Balding | SA | 100.00 | \$525.00 | \$52,500.00 |
| J. Alex Vargas | I | 155.00 | \$675.00 | \$104,625.00 |
| Sinai Megibow | I | 154.50 | \$550.00 | \$84,975.00 |
| Dylan Gatzke | LA | 20.80 | \$435.00 | \$9,048.00 |
| Amy Weas | PL | 27.80 | \$395.00 | \$10,981.00 |
| Kelly Hogan | PL | 16.00 | \$415.00 | \$6,640.00 |
| Kaitlin Steinberger | PL | 40.30 | \$395.00 | \$15,918.50 |
| Kim Jager | PL | 12.00 | \$435.00 | \$5,220.00 |
| Matthew Molloy | PL | 17.50 | \$415.00 | \$7,262.50 |
| TOTAL | | 1946.90 | | \$1,413,012.50 |

(P) Partner

(A) Associate

(SA) Staff Attorney

(I) Investigator

(LA) Legal Assistant

(PL) Paralegal

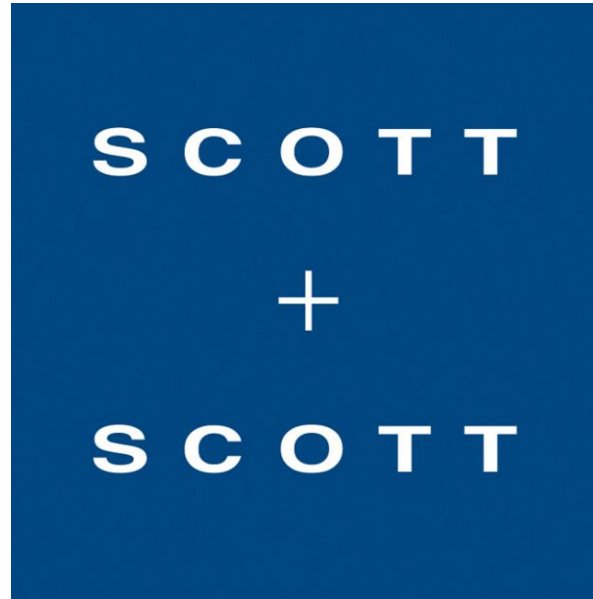
EXHIBIT B

EXHIBIT B

In re Funko, Inc. Securities Litigation , Case No. 17-2-29838-7 SEA
SCOTT+SCOTT ATTORNEYS AT LAW LLP
Inception through February 12, 2025

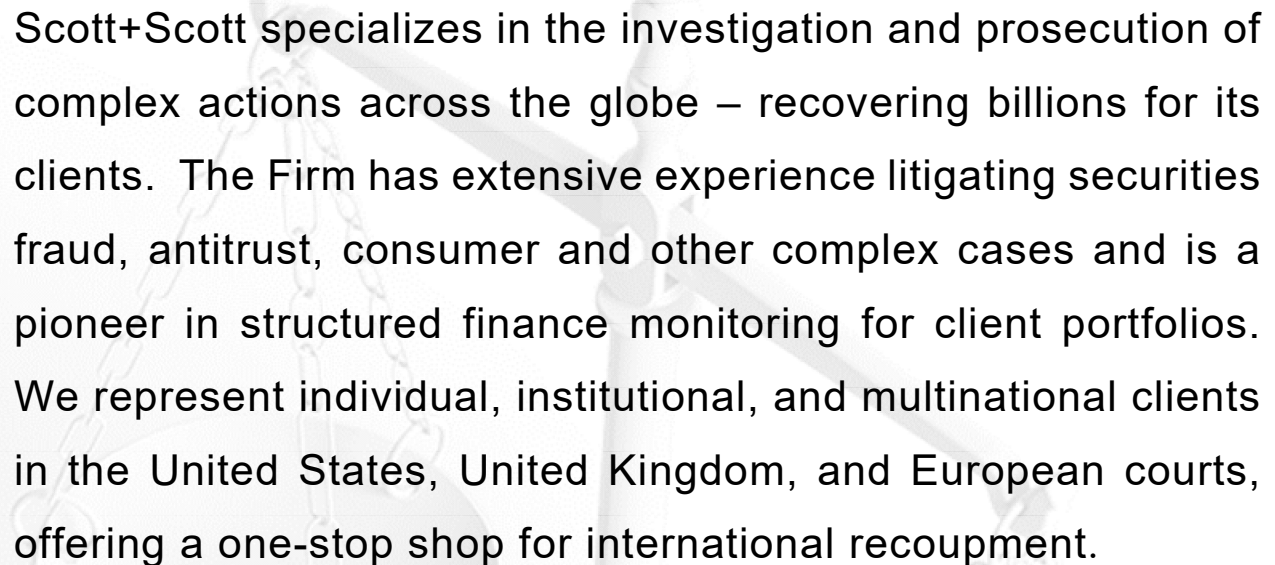
| EXPENSE | AMOUNT |
|--------------------------------------|--------------------|
| Filings, Court, & Service of Process | \$3,450.79 |
| Deposition Reporting & Transcripts | \$2,984.27 |
| Litigation Fund Contribution | \$20,000.00 |
| Electronic Discovery Platform | \$262.73 |
| Online Legal Research | \$6,816.71 |
| Photocopies & Printing | \$386.00 |
| Transportation, Hotels, & Meals | \$1,634.09 |
| Press Releases | \$2,492.00 |
| Local Counsel | \$1,227.87 |
| TOTAL | \$39,254.46 |

EXHIBIT C



FIRM RESUME

www.scott-scott.com

A faint, light gray background image of a pair of scales of justice, symbolizing law and equity.

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



THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust and other commercial actions in both the United States and Europe. Today, the Firm is comprised of more than 135 team members, including more than 100 attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators.

Scott+Scott's largest offices are in New York, N.Y. and San Diego, C.A., with additional U.S. offices located in Connecticut, Arizona, Delaware, Nebraska, Ohio, Texas, and Virginia. The Firm's European offices are currently located in London, Amsterdam, and Berlin.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, having served as court-appointed lead or co-lead counsel in numerous securities, antitrust, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents large investors and numerous corporations in commercial and other litigation in courts within the European Union (EU) and the United Kingdom.

Scott+Scott's attorneys are recognized experts and leaders in complex litigation and corporate governance. They have been regular speakers on CLE panels as well as at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives. The Firm's vast experience in structured debt financial litigation has also enabled us to provide clients with in-depth monitoring of their structured finance products, which often come with substantial undisclosed risks due to investors' limited ability to assess what they are acquiring. The Firm also has experience evaluating and monitoring for our clients' debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives.



SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott has extensive experience litigating claims for violations of the federal securities laws on behalf of our municipal, institutional, and individual investor clients, serving as lead counsel in numerous securities class actions brought under the Securities Act of 1933, the Securities Exchange Act of 1934, and other statutes.

Scott+Scott recognizes that, particularly since the passage of the Private Securities Litigation Reform Act of 1995, bringing successful claims for violations of the federal securities laws requires not only significant litigation experience, but also the ability to bring to bear the skills of its in-house investigators and financial analysts (and often outside consultants) to build a case that can survive both early-stage motions to dismiss and later stage motions for summary judgment. Our philosophy is also based on our view that efforts to negotiate a successful settlement are typically built on the quality of pre-filing investigation diligence, and our willingness to litigate deep into discovery and, if necessary, through summary judgment and trial.

Our securities litigators have experience practicing in state and federal courts across the country. The Firm's attorneys have regularly retained and worked with leading accounting experts, damages experts, and relevant industry experts to build their clients' cases against defendants involved in virtually every type of industry, from pharmaceuticals to dot.coms, from retailers to manufacturers, and from investment banks to accounting firms. The Firm has also submitted *amicus curiae* briefs to the United States Supreme Court on behalf of its clients on important securities laws issues, including in support of the plaintiffs in *California Public Emps.' Ret. Sys. ANZ Securities, Inc.*, 137 S. Ct. 2042 (2017) and *Cyan Inc. v. Beaver County Emp. Ret. Fund*, 138 S. Ct. 1061 (2018).

When appropriate, Scott+Scott prosecutes actions on a class or individual basis. Through our commitment to the best interests of those the Firm represents, Scott+Scott has successfully obtained exceptional monetary results and precedent-setting corporate governance reforms on behalf of investors.

SECURITIES CASE EXAMPLES

Securities class actions where Scott+Scott currently serves as lead or co-lead counsel include:

- *Severt v. UiPath, Inc.*, No. 1:23-cv-07908 (S.D.N.Y.);
- *City of Omaha Police and Firefighters Ret. Sys. v. Cognyte Software Ltd.*, No. 1:23-cv-01769 (S.D.N.Y.);
- *In re Yatsen Holding Limited Sec. Litig.*, No. 1:22-cv-08165 (S.D.N.Y.);
- *Gupta v. Athenex, Inc.*, No. 1:21-cv-337 (W.D.N.Y.);
- *City of Southfield Fire and Police Retirement System v. Hayward Holdings, Inc.*, No. 2:23-cv-04146 (D.N.J.);
- *White v. Brooge Energy Limited*, No. 2:24-cv-00959 (C.D. Cal.);
- *Marselis v. Fox Factory Holding Corp.*, No. 1:24-cv-00747 (N.D. Ga)
- *In re SentinelOne, Inc. Sec. Litig.*, No. 4:23-CV-02786 (N.D. Cal.);
- *Sundaram v. Freshworks, Inc.*, No. 3:22-cv-06750 (N.D. Cal.);
- *Strezsak v. Ardelyx Inc.*, No. 4:21-cv-05868 (N.D. Cal.);
- *Golubowski v. Robinhood Mkts.*, No. 3:21-cv-09767 (N.D. Cal.);
- *In re Vaxart, Inc. Sec. Litig.*, No. 3:20-cv-05949 (N.D. Cal.);
- *City of Birmingham Relief and Ret. Sys. v. Acadia Pharms. Inc.*, No. 3:21-cv-00762 (S.D. Cal.);
- *Frouws v. Edgio, Inc.*, et al., No. 2:23-CV-00691 & No. 2:23-CV-01170 (D. Az.);
- *In re Infinity Q Divers. Alpha Fund Sec. Lit.*, No. 651295/2021 (N.Y. Supr. Ct. N.Y. Cnty.);
- *Patel v. Viatris, Inc.*, No. GD-21-13314 (Pa. Ct. Com. Pl.)
- *In re Cloudera, Inc. Secs. Litig.*, No. 19CV348674 (Cal. Super. Ct. Santa Clara Cnty.);
- *In re Slack Techs., Inc. S'holder Litig.*, No. 19CIV05370 (Cal. Super. San Mateo Cnty.);
- *Mancour v. SmileDirectClub, Inc.*, No.: 19-1169-IV (Tenn. Chancery Ct, Davidson Cnty.).



Securities class actions which have been resolved where Scott+Scott served as lead or co-lead counsel include:

- *Alaska Elec. Pension Fund v. Pharmacia Corp.*, No. 03-cv-01519 (D.N.J.) (\$164 million settlement);
- *Thurber v. Mattel, Inc.*, No. 2:99-cv-10368 (C.D. Cal.) (\$122 million);
- *In re LendingClub Corp. S'holder Litig.*, No. CIV 537300 (Cal. Super. Ct, San Mateo Cnty.) (part of \$125 global settlement);
- *In re Micro Focus Int'l plc Sec. Litig.*, Lead Case No. 18CIV01549 (CA Super. Ct. San Mateo Cnty.) (\$107.5 million settlement);
- *Okla. Firefighters Pens. vs. Newell Brands Inc.*, No. L-003492-18 (N.J. Sup. Ct. Hudson Cnty.) (\$102.5 million settlement);
- *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn.) (\$80 million settlement);
- *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y.) (\$75 million settlement);
- *Cornwell v. Credit Suisse Grp.*, No. 08-cv-03758 (S.D.N.Y.) (\$70 million settlement);
- *Policemen's Annuity & Benefit Fund of Chi. v. Bank of Am., N.A.*, No. 12-cv-02865 (S.D.N.Y.) (\$69 million settlement);
- *In re Nw. Corp. Sec. Litig.*, No. 4:03-cv-04049 (D.S.D.) (\$61 million);
- *In re SanDisk LLC Sec. Litig.*, No. 15-cv-01455 (N.D. Cal.) (\$50 million settlement);
- *In re Sprint Sec. Litig.*, No. 00-230077 (Mo. Cir. Ct., Jackson Cnty.) (\$50 million);
- *In re Emulex Corp. Sec. Litig.*, No. 8:01-cv-00219 (C.D. Cal.) (\$39 million);
- *Weston v. RCS Cap. Corp.*, No. 14-cv-10136 (S.D.N.Y.) (\$31 million settlement);
- *In re Greensky Sec. Litig.*, No. 1:18 Civ. 11071 (S.D.N.Y.) (\$27.5M settlement);
- *Schnall v. Annuity & Life Re (Holdings) Ltd.*, No. 3:02-cv-02133 (D. Conn.) (\$27 million);
- *In re Wash. Mut. Mortg.-Backed Sec. Lit.*, No. 2:09-cv-00037 (W.D. Wash.) (\$26 million recovery);
- *ATRS v Insulet Corp.*, No. 15-12345 (D. Mass.) (\$19.5 million settlement);
- *In re King Digit. Ent. PLC S'holder Litig.*, No. CGC-15-544770 (Cal. Sup. Ct. San Francisco Cnty.) (\$18.5 million settlement);



- *In re Evoqua Water Corp. Sec. Litig.*, No. 1:18-cv-10320 (S.D.N.Y.) (\$16.65 million settlement);
 - *In re Conn's, Inc. Secs. Litig.*, No. 4:14-cv-00548 (S.D. Tex.) (\$22.5 million settlement);
 - *In re DouYu Int'l Hold'gs Ltd. Sec. Litig.*, No. 651703/2020 (N.Y. Supr. Ct. N.Y. Cnty.) (\$15 million settlement);
 - *Abadilla v. Precigen, Inc.*, No. 5:20-cv-06936 (N.D. Cal.) (\$13 million settlement);
 - *Collins v. Oilsands Quest Inc.*, No. 11 Civ. 1288 (S.D.N.Y.) (\$10.235 million settlement);
 - *Kaplan v. S.A.C. Cap. Advisors, L.P.*, No. 1:12cv-9350 (S.D.N.Y.) (\$10 million settlement);
 - *Rosenberg v. Cliffs Natural Res. Inc.*, No. CV 14 828140 (Ct. Common Pleas Cuyahoga Cnty. Ohio) (\$10 million settlement);
 - *Erie Cnty. Empl. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Supr. Ct. N.Y. Cnty.) (\$9.5 million settlement);
 - *In re Endochoice Holdings, Inc., Sec. Litig.*, No. 2016 CV 277772 (Ga. Sup. Ct. Fulton Cnty) (\$8.5 million settlement);
 - *Okla. Police Pension Fund & Ret. Sys. v. Jagged Peak Energy, Inc.*, No. 2017 CV 31757 (Colo. Dist. Ct., Denver Cnty.) (\$8.25 million settlement);
 - *In re Netshoes Secs. Litig.*, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) (\$8 million settlement);
 - *City of Omaha Police & Fire Ret. Sys. v. LHC Grp, Inc.*, No. 6:12-CV-01609 (W.D. La.) (\$7.85 million settlement);
 - *In re Pac. Coast Oil Trust Secs. Litig.*, No. BC550418 (Cal. Sup. Ct. Los Angeles Cnty.) (\$7.6 million settlement);
 - *In re Pacific Biosci. of C.A., Inc. Sec. Litig.* (Cal. Sup. Ct. San Mateo Cnty.) (\$7.6 million recovery);
 - *Plymouth Cnty. Contributory Ret. Sys. v. Adamas Pharms., Inc.*, No. RG19018715 (Cal. Sup. Ct. Alameda Cnty.) (\$7.5M settlement);
 - *St. Lucie Cnty. Fire Dist. Firefighters' Pens. Trust v. Southwestern Energy Co.*, No. 2016-70651 (Tex. Dist. Ct. Harris Cnty.) (\$7 million settlement);
 - *Jochims v. Oatly Group AB*, No. 1:21-cv-06360 (S.D.N.Y.);
 - *Pompano Beach Police and Firefighters Ret. Sys. v. Olo Inc.*, No. 1:22-cv-08228 (S.D.N.Y.);
- and



- *Mo-Kan Iron Workers Pension Fund v. Teligent, Inc.*, No. 1:19-cv-03354 (S.D.N.Y.) (\$6 million settlement).

SHAREHOLDER DERIVATIVE CASE EXAMPLES

Shareholder derivative actions where Scott+Scott currently serves in a sole or leadership role include:

- *In re Facebook Derivative Litig.*, Consol. No. 2018-0307 (Del. Ch.);
- *Evergreen Capital Mgmt. LLC v. Pacific Coast Energy Co. LP*, No. 20STCV26290 (Cal. Sup. Ct.);
- *In re Alphabet, Inc., S'holder Derivative Litig.*, No. 3:21-cv-09388-RS (N.D. Cal.);
- *Lindsey v. Immelt*, Index No. 2020/19718 (N.Y. Sup. Ct.);
- *Okla. Firefighters Pension and Ret. Sys. v. Calhoun*, No. 1:24-cv-01200 (E.D. Va.);
- *In re Exelon Corp. Derivative Litig.*, No. 1:21-cv-03611 (N.D. Ill.);
- *Presura v. Casey*, (Del. Ch.);
- *Trimm v. Schultz*, (Wash. Sup. Ct., Kings County); and
- *In re Abbott Lab's Infant Formula S'holder Derivative Litig.*, No. 1:22-cv-05513 (N.D. Ill.).

Representative shareholder derivative actions litigated by Scott+Scott which have been successfully resolved include:

- *Irving Firemen's Relief & Ret. Fund v. Page*, C.A. No. 2019-0355-Sg (Del. Ch. 2020) (\$310 million in funding for corporate governance reform programs over 10 years);
- *In re DaVita Healthcare Partners Derivative Litig.*, No. 13-cv-01308 (D. Colo.) (corporate governance reforms valued at \$100 million);
- *Buffalo Grove Police Pension Fund v. Diefenderfer*, No. 19-cv-00062 (E.D. Pa.) (claims vs. Navient Corp. officers & directors settled for corporate governance reforms valued at \$139 million);
- *Tharp v. Acacia Commc'ns, Inc.*, No. 1:17-cv-11504 (D. Mass.) (claims vs. company and corporate officers & directors settled for corporate governance reforms valued at \$57-\$71 million);
- *N. Miami Beach Gen. Emps. Ret. Fund v. Parkinson*, No. 10-cv-06514 (N.D. Ill.) (corporate governance reforms valued between \$50 and \$60 million);



- *In re Marvell Tech. Grp. Ltd. Derivative Litig.*, No. 06-cv-03894 (N.D. Cal.) (\$54.9 million settlement and corporate governance reforms);
- *Rudi v. Wexner*, No. 2:20-cv-3068 (S.D. Ohio) (\$90 million in funding for corporate governance reform programs over at least 5 years);
- *In re Universal Health Servs., Inc. Derivative Litig.*, No. 2:17-cv-02187 (E.D. Pa.) (Settled for corporate governance reforms conservatively valued at \$110 million);
- *In re Altria Group, Inc. Deriv. Litig.*, Consol. No. 3:20-cv-00772 (E.D. Va.) (successfully resolved for corporate governance reforms with multi-year funding commitment of \$117 million);
- *In re Symantec Corp. S'holder Deriv. Litig.*, Consol. C.A. No. 2019-0224-JTL (Del. Ch.) (successfully resolved for \$12 million cash payment to company and corporate governance reforms);
- *Bottoni v. Hernandez*, No. 20-cv-01442 (S.D. Tex.) (claims vs. Fluor Corporation officers & directors settled for corporate governance reforms with four years of funding estimated at \$10 million); and
- *In re World Wrestling Ent., Inc. Derivative S'holder Litig.*, Consol. C.A. No. 2023-0039-JTL (Del. Ch.).

ACCOLADES

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

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

American Antitrust Institute

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

Global Competition Review

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

Law 360 Glass Ceiling Report

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

Center for Constitutional Rights

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

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

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

WORLD-CLASS ATTORNEYS

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



ADMISSIONS

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

ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

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

ADMISSIONS

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

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989); St. Lawrence University (B.A., cum laude, 1986)

HIGHLIGHTS

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

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

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

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

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

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

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

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



DARYL F. SCOTT

PRACTICE EMPHASIS

Daryl F. Scott specializes in complex securities litigation.

ADMISSIONS

State of Virginia

EDUCATION

Georgetown University Law Center (Masters in Taxation, 1986); Creighton University School of Law (J.D., 1984); Vanderbilt University (B.A. Economics, 1981)

HIGHLIGHTS

Mr. Scott is a partner across all offices and involved in complex securities litigation at Scott+Scott. In addition to his work with the firm, Mr. Scott has specialized in private foundation and ERISA law. He was also formerly an executive officer of a private equity firm that held a majority interest in a number of significant corporations. Mr. Scott is admitted to the Supreme Court of Virginia and is member of the Virginia and Connecticut Bar Associations.



AMANDA LAWRENCE

PRACTICE EMPHASIS

Amanda F. Lawrence is actively engaged in the Firm's complex securities, corporate governance, consumer, and antitrust litigation.

ADMISSIONS

States of Connecticut and Massachusetts; United States Courts of Appeal: First and Ninth Circuits; United States District Courts: Southern District of New York, Connecticut, and Massachusetts

EDUCATION

Yale Law School (J.D., 2002); Dartmouth College (B.A., *cum laude*, 1998)

HIGHLIGHTS

Ms. Lawrence is a partner in our Connecticut office. In the antitrust realm, Ms. Lawrence served as co-lead counsel in the matter, *In re: GSE Bonds Antitrust Litigation*, No. 1:19-cv-01704-JSR (S.D.N.Y.) which alleged manipulation of the prices in the \$550 billion government sponsored entities bond market by some of the largest banks in the world. The case settled for \$386.5 million as well as requiring injunctive relief. Ms. Lawrence was also intricately involved in the "ISDAFix case" – *Alaska Electrical Pension Fund v. Bank of America*, 1:14-cv-07126-JMF-OTW (S.D.N.Y.). That achieved over \$504.5 million in recovery from large financial institutions for investors. Currently, Ms. Lawrence also works on *In Re Cattle Antitrust Litig.*, 0:22-md-03031-JRT-JFD (D. Minn.) and *In re European Governments Bonds Antitrust Litig.*, 1:19-cv-2601 (S.D.N.Y.), two large international antitrust actions.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements. For example, she served as co-lead counsel in *In re: Micro Focus International PLC Securities Litigation*, No. 18-cv-01549 (Cal. Super. Ct. San Mateo Cnty.), a California 1933 Act that settled for \$107.5 million. Other securities cases Ms. Lawrence has worked on include: *Police and Fire Retirement System of the City of Detroit v. Crane*, No. 13-cv-00945-VC (N.D. Cal.) (\$5.1 million securities class action settlement); *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million); *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.) (\$26 million securities class action settlement); *In re Fireeye, Inc. Securities Litigation*, No. 14-cv-266866 (Cal. Super. Ct. Santa Clara Cnty.); *St. Lucie Cnty. Fire Dist. Firefighters' Pension Trust v. Southwestern Energy Co.*, No. 4:16-cv-569 (S.D. Tex.); *In re LendingClub Corp. Shareholder Litig.*, No. CIV537300 (Cal. Super. Ct San Mateo Cnty.); and *In re TETRA Technologies, Inc. Securities Litig.*, No. 4: 07-cv-00965 (S.D. Tex.) (\$8.25 million securities class action settlement).



In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in the *The United States v. The City of New York*, No. 07-CV-2067 (E.D.N.Y.) that awarded back pay and lost fringe benefits to a class of African American and Hispanic firefighters in New York City, as well as a settlement in *In re Prudential Life Insurance Co. of America SGLI/VGLI Contract Litig.*, No. 11-02208 (D. Mass.) that brought a \$39 million settlement on behalf of families of deceased servicemen and women against Prudential.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events.

A five-time NCAA National Champion cyclist who raced throughout the United States, Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. Ms. Lawrence has competed in dozens of marathons, including the New York Marathon and the Boston Marathon, and in 18 full-distance ironman competitions – five of which were at the Ironman World Championships in Kona, Hawaii.



DONALD A. BROGGI

PRACTICE EMPHASIS

Mr. Broggi is engaged in the Firm's securities, antitrust, mass tort, and consumer litigation practices.

ADMISSIONS

States of New York and Pennsylvania

EDUCATION

Duquesne University School of Law (J.D., 2000); University of Pittsburgh (B.A., 1990)

HIGHLIGHTS

Mr. Broggi is a partner in the Firm's New York office and has represented institutional investors, including public pension funds and Taft-union funds in a variety of complex cases, including: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-07789 (S.D.N.Y.): an antitrust class action alleging the world's largest banks conspired to fix the price of foreign currencies (\$2.3 billion in settlements to date); *Alaska Elec. Pension Fund v. Bank of Am. Corp.*, No. 14-cv-07126 (S.D.N.Y.): an antitrust class action alleging the world's largest banks conspired to manipulate the ISDAfix rate (\$504 million settlement); *Dahl v. Bain Capital Partners*, No. 07-cv-12388 (D. Mass.): an antitrust class action alleging that the nation's largest private equity firms, including KKR, Blackstone, TPG, Carlyle, Bain Capital, and Goldman Sachs, colluded to restrain competition and suppress prices paid to shareholders of public companies in connection with multi-billion dollar leveraged buyouts (\$590.5 million settlement); *In re GSE Bonds Antitrust Litigation*, No. 19-cv-01704 (S.D.N.Y.): an antitrust class action alleging manipulation in the market for bonds issued by Government-Sponsored Entities, e.g., Freddie Mac and Fannie Mae (\$386.5 million settlement pending final approval); *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y.): a securities fraud class action alleging that defendants violated Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 by issuing materially false and misleading statements to the market regarding the cancer drug Erbitux (\$75 million settlement); *In re Wash. Mut. Mortg.-Backed Sec. Litigation*, No. 09-cv-00037 (W.D. Wash.): a securities fraud class action against Washington Mutual Bank alleging violations of §11 of the Securities Act for misleading investors about the quality of their mortgage-backed securities (\$69 million settlement); *In re SanDisk LLC Sec. Litigation*, No. 15-cv-01455 (N.D. Cal.): a securities fraud class action alleging that defendants intentionally inflated the price of the Company's stock by making false and misleading statements and concealing information relating to SanDisk's business, operations, and prospects (\$50 million settlement); and *Arkansas Teacher Retirement System v. Insulet Corp.*, No. 15-cv-12345 (D. Mass.): a securities fraud class action alleging Insulet Corporation intentionally inflated the price of the Company's stock by issuing false and misleading statements concerning Insulet's launch of its new insulin infusion system, branded the OmniPod Eros (\$19.5 million settlement), among others.



Currently, Mr. Broggi is also representing cities, counties, and other municipalities from Massachusetts, Pennsylvania, New Jersey, and Florida in both state and federal litigation against the manufacturers and distributors of opioid medications.

Mr. Broggi also works with the Firm's institutional investor clients, including hundreds of public pension systems and Taft-Hartley funds throughout the United States, to confirm their funds have proper safeguards in place to ensure against corporate malfeasance, and regularly consults with institutional investors in the United States on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation.

Mr. Broggi has lectured at institutional investor conferences throughout the United States on the value of shareholder activism as a necessary component of preventing corporate fraud abuses, including the Texas Association of Public Employee Retirement Systems, Georgia Association of Public Pension Trustees, Michigan Association of Public Retirement Systems, Illinois Public Pension Fund Association, and the Pennsylvania Association of County Controllers, among others.

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JOHN T. JASNOCH

PRACTICE EMPHASIS

John Jasnoch's practice areas include securities and antitrust class actions, shareholder derivative actions, consumer protection, commercial contracts, intellectual property, and other complex, high stakes litigation.

ADMISSIONS

State Supreme Courts: California; United States District Courts: Southern, Central, and Northern Districts of California; United States Court of Appeal: Ninth Circuit

EDUCATION

University of Nebraska, College of Law (J.D., 2011); Creighton University (B.A., Political Science and International Relations, *cum laude*, 2007)

HIGHLIGHTS

John Jasnoch is a partner in the San Diego office. He represents clients in complex litigations in state and federal courts across the country. John has been counsel of record in numerous successful cases where Scott+Scott served in a leadership capacity, including: *In re LendingClub Corp. Shareholder Litigation*, No. CIV537300 (Cal. Super. Ct. San Mateo Cty) (\$125 million federal and state joint settlement); *In re King Digital Entertainment plc Shareholder Litigation*, No. CGC-15-544770, (Cal. Super. Ct. San Francisco Cty.) (\$18.5 million settlement); *In re FireEye, Inc. Securities Litigation*, No. 1:14-cv-266866 (Cal. Super. Ct. Santa Clara Cty.) (\$10.3 million settlement); *In re Pacific Coast Oil Trust Securities Litigation*, No. BC550418 (Cal. Super. Ct. Los Angeles Cty.) (\$7.6 million settlement); and *In re MobileIron, Inc., Shareholder Litigation*, No. 1-15-284001 (Cal. Super. Ct. Santa Clara Cty) (\$7.5 million settlement). John currently represents plaintiffs in a number of high profile cases, including *In re Lyft, Inc. Securities Litigation*, No. CGC 19-575293 (Cal. Super Ct. San Francisco Cty); *In re Uber Technologies Inc. Securities Litigation*, No. CGC 19-579544 (Cal. Super Ct. San Francisco Cty); *In re Slack Technologies, Inc. Shareholder Litigation*, No. 19-cv-5370 (Cal. Super Ct. San Mateo Cty); and *In re Google Assistant Privacy Litigation*, No. 19-cv-04286 (N.D. Cal.).

In 2015, Mr. Jasnoch was a member of the trial team in *Scorpio Music S.A. v. Victor Willis*, a landmark copyright jury trial concerning the copyright ownership of hit songs by The Village People. In that suit, Scott+Scott client and Village People lyricist Victor Willis obtained a declaratory judgment confirming his copyright termination and giving him a 50% copyright interest in "YMCA" and other classic Village People compositions. No. 11-cv-1557 (S.D. Cal.).



In 2020, Mr. Jasnoch was named as one of SuperLawyers' "Rising Stars" for Securities Litigation in the San Diego Area.

In his free time, John enjoys attending sporting events, trivia contests, fun runs, and other adventures with his wife Jennifer, sons James and Julius, and dog Jack.



JONATHAN ZIMMERMAN

PRACTICE EMPHASIS

Jonathan Zimmerman's practice primarily focuses on identifying, investigating and initiating complex federal securities class actions on behalf of individual and institutional shareholders. He is also involved in multiple shareholder derivative actions and other complex commercial matters.

ADMISSIONS

States of New Jersey and Pennsylvania; United States District Courts: District of New Jersey and Eastern District of Pennsylvania

EDUCATION

Temple University, Beasley School of Law (J.D., 2016); McGill University, Desautels School of Management (Bachelor of Commerce, 2009)

REPRESENTATIVE CASES

- *In re SanDisk LLC Securities Litigation*, No. 3:15-CV-01455-VC (N.D. Cal.) (part of the team that recovered \$50 million in class action alleging violations of the Securities Exchange Act of 1934)
- *City of Birmingham Relief and Retirement System v. Hastings*, No. 5:18-cv-02107-BL (N.D. Cal.)

HIGHLIGHTS

Mr. Zimmerman is an associate in the New York office where he focuses on federal securities and shareholder derivative litigation. He is the Former Staff Editor of Temple's *International and Comparative Law Journal* and Recipient of Best Paper Award in Advanced Financial Regulations for his work entitled *Corporate Diversions: Short-Term Tax Savings at the Expense of Shareholder Rights* (Spring 2015).

Mr. Zimmerman is a former two-time All-Canadian collegiate lacrosse player and co-captain of McGill University's men's varsity team.



MAX SCHWARTZ

PRACTICE EMPHASIS

Max Schwartz's practice focuses on complex civil litigation, often involving financial products and services. He also counsels investment firms and institutional investors on strategies to enhance returns, or recoup losses, through a variety of legal actions.

ADMISSIONS

State of New York; United States District Courts: Southern District of New York

EDUCATION

New York University School of Law (J.D.); Columbia University (B.A., *cum laude*)

HIGHLIGHTS

Max Schwartz is a Partner in the Firm's New York office, focusing on securities matters and complex litigation. He has served as lead counsel in numerous high-stakes cases, recovering hundreds of millions of dollars for institutional investors, hedge funds and other clients. He also advises clients on strategies for using legal rights and remedies to enhance returns or recoup losses on investments.

Mr. Schwartz has expertise in matters involving a wide variety of industries, ranging from financial products to data storage and AI, and has successfully brought novel claims to obtain recoveries for clients. Following the financial crisis, Mr. Schwartz set important precedent involving mortgage-backed securities ("MBS"), arguing the first cases to find that trustees had an obligation to enforce investors' rights and have deficient mortgages repurchased from MBS trusts. In addition to fraud and other securities claims, Mr. Schwartz has significant experience litigating antitrust and shareholder cases as well.

Super Lawyers named Mr. Schwartz a Rising Star and the Legal Aid Society also recognized him with a Pro Bono Service Award for work before the New York Court of Appeals.

REPRESENTATIVE CASES

- ***Okla. Firefighters Pens. vs. Newell Brands Inc.***, No. L-003492-18 (N.J. Sup. Ct. Hudson Cnty.)
- ***Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA***, No. 1:12-cv-2865 (S.D.N.Y.)
- ***In re SanDisk LLC Sec. Litig.***, No. 15-cv-01455 (N.D. Cal.)
- ***Weston v. RCS Capital Corp.***, No. 1:14-cv-10136 (S.D.N.Y.)
- ***Dahl v. Bain Capital Partners, LLC***, No. 1:07-cv-12388 (D. Mass.)

PATRICK MCGAHAN

PRACTICE EMPHASIS

Mr. McGahan specializes in antitrust and commodities litigation before United States and English courts.

ADMISSIONS

State of New York; United States District Court for the Southern District of New York; District of Colorado; England and Wales (with Higher Rights of Audience); Queensland, Australia

EDUCATION

King's College London (Postgraduate Diploma in Competition Law, 2015); University of Queensland (Bachelor of Laws, First Class Honours, and Bachelor of Arts, 2010)

CLERKSHIPS

Mr. McGahan clerked for the Honorable Justice Greenwood in the Australia Federal Court in 2011.

HIGHLIGHTS

Mr. McGahan is a partner in Scott+Scott's Connecticut and London offices and works closely with other members of the firm's Antitrust and Competition Practice in counseling corporate and institutional clients, evaluating potential claims, and developing strategies to recover losses caused by anticompetitive conduct. He has also acted for clients in a variety of securities litigation, arbitrations (both investment treaty and commercial), and pieces of general commercial litigation.

In the United States, Mr. McGahan has a strong agricultural focus. He presently leads the Scott+Scott team acting as co-lead counsel on behalf of cattle ranchers and futures traders alleging a conspiracy among the nation's meatpackers to suppress fed cattle prices. ***In re Cattle Antitrust Litigation***, No. 22-md-03031 (D. Minn.). Mr. McGahan also serves as Court-appointed liaison counsel on behalf of the rancher plaintiffs. He separately acts on behalf of dairy-farmers accusing Dairy Farmers of America of anticompetitive conduct in the South-West. ***Othart Dairy Farms, LLC. v. Dairy Farmers of America, Inc.***, No. 22-cv-00251-MIS-DLM (D. N.M.).

Outside of agriculture, Mr. McGahan is active in the intersection between antitrust and tech. He is currently part of the Scott+Scott leadership teams acting as Court-appointed co-lead counsel in:

- ***In re RealPage, Inc., Rental Software Antitrust Litigation***, No. 3:23-md-03071 (M.D. Tenn.) (alleging price-fixing amongst developer of AI/algorithmic pricing software and property managers in the multifamily rental housing markets); and

- ***Klein, et al. v. Meta Platforms, Inc.***, No. 5:20-cv-08570-LHK (N.D. Cal.) (alleging that Facebook monopolized the social advertising market).

Mr. McGahan has significant experience in the payments space, having litigated numerous suits in England on behalf of retailers (including Vodafone, Hermès, GrandVision, Michelin, Dunelm, Soho House, Grange Hotels) in their claims against Visa and Mastercard in relation to anti-competitive interchange fees. He is also acting for U.S. merchants in their claim that Apple's agreement with Visa and Mastercard to lock-out competing payment schemes from ApplePay was anticompetitive. ***Mirage Wine + Spirits, Inc. v. Apple Inc. et al.***, No. 3:23-cv-3942 (RJD) (S.D. Ill.).

Outside of antitrust, Mr. McGahan is active in commodities and securities manipulation cases, including ***Two Roads Shared Trust v. John Does***, No. 20-cv-00831 (N.D. Ill.) (alleging manipulative trading of SPX Options in breach of the Commodities Exchange Act on behalf of a publicly traded investment vehicle in relation to losses exceeding \$600 million), ***In re Netshoes Sec. Litig.***, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) (\$8 million settlement on behalf of Netshoes' investors), and ***Robinson v. Diana Containerships***, No. 17-cv-6160 (E.D.N.Y.) (alleging conspiracy between funder and various Greek shipping companies), among other matters. Mr. McGahan also presently serves as lead counsel in pieces of general commercial litigation, including breach of contract. ***Two Roads Shared Trust v. Wells Fargo Securities*** (N.Y. Sup. Ct.) (alleging breach of Futures Clearing Merchant (FCM) contract); and ***Two Roads Shared Trust v. Wedbush Securities, Inc.***, Case No. 2023L009473 (Cook Cnty. Super. Ct. Ill.) (alleging breach of commodities give-up agreement).

Prior to joining Scott+Scott, Mr. McGahan spent four years in the London office of Freshfields Bruckhaus Deringer LLP. During this time, he acted in many of the leading English competition damages cases, including ***National Grid Electricity Transmission Plc v. ABB Ltd.*** He also acted for numerous clients in competition law investigations, both internal investigations and those brought by the Competition and Markets Authority, the European Commission, and other regulators.

HOBBIES

When not at work, Mr. McGahan enjoys cycling, hiking, and, skiing with his three children.

ARTICLES

Mr. McGahan co-authored with Belinda Hollway, David Howe, and Devina Shah, *Cartel Damages Settlements and the Damages Directive: The End of the Road for Contribution Claims*, Global Competition Review (2017), Volume 10.

He also co-authored with David Howe and Cian Mansfield, *Intel on Jurisdiction: An Intelligent Approach to Treating Anticompetitive Conduct across Global Supply Chains*, Global Competition Review (2018), Volume 1.



SEAN T. MASSON

PRACTICE EMPHASIS

Focusing his litigation efforts on class actions involving cryptocurrency and digital assets, mass torts, and complex commercial cases, Mr. Masson represents retail and institutional investors, government entities, and consumers around the globe. Currently, he is a partner in the firm prosecuting pharmaceutical companies and distributors for their role in the marketing and overprescribing of highly addictive opioid painkillers.

ADMISSIONS

State of New York; United States District Courts: Southern, Eastern, and Northern Districts of New York, Eastern District of Wisconsin

EDUCATION

Hofstra University School of Law (J.D., *cum laude*, 2009); Queens College (B.A., *summa cum laude*, 2006)

HIGHLIGHTS

Super Lawyers has named Mr. Masson a Rising Star for five consecutive years (2015-2019) for his work as a class action litigator.

Prior to entering the private sector, Mr. Masson served as an Assistant District Attorney in the Manhattan DA's Office, successfully arguing over 40 appeals in state and federal courts and gaining extensive experience with large-scale government and regulatory investigations. Notable cases include: *People v. McKelvey* (upheld 75-year sentence for serial rapist preying on homeless women); *People v. Chance* (creating precedential law on issue of first impression regarding the disposal of stolen property under N.Y. Penal Law); and *People v. Espinal* (affirming murder-for-hire and conspiracy convictions for high ranking member of a large-scale cocaine trafficking operation).

During law school, Mr. Masson served as the Senior Notes and Comments Editor of the Hofstra Law Review and won the 1L Excellence in Torts award.

Mr. Masson's publications include: *The Presidential Right of Publicity*, 2010 BOSTON COLLEGE INTELLECTUAL PROPERTY & TECHNOLOGY FORUM 012001 and Note, *Cracking Open the Golden Door: Revisiting U.S. Asylum Law's Response To China's One-Child Policy*, 37 HOFSTRA LAW REVIEW 1135 (2009).



THOMAS LAUGHLIN

PRACTICE EMPHASIS

Thomas Laughlin's practice focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: Second, Third, Ninth, and Eleventh Circuits; United States District Courts: Southern and Eastern Districts of New York, Northern District of Florida, District of Columbia, and Eastern District of Michigan

EDUCATION

New York University School of Law (J.D., *cum laude*, 2005); Yale University (B.A. History, *cum laude*, 2001)

HIGHLIGHTS

Mr. Laughlin is a partner in the New York office and focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation. After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including *Cornwell v. Credit Suisse*, No. 08-3758 (S.D.N.Y.) (securities settlement of \$70 million), *In re SanDisk LLC Securities Litigation*, No. 3:15-CV-01455-VC (N.D. Cal.) (securities settlement of \$50 million); *Weston v. RCS Capital Corp.*, No. 1:14-cv-10136-GBD (S.D.N.Y.) (securities settlement of \$31 million); *In re King Digital Entertainment plc Shareholder Litigation*, No. CGC-15-544770 (Cal. Super. Ct. San Francisco Cnty.) (securities settlement of \$18.5 million); and *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million).

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013); *Westmoreland County Employee Ret. Sys. v. Parkinson*, 727 F.3d 719 (7th Cir. 2013); *Pfeil v. State Street Bank and Trust Co.*, 671 F.3d 585 (6th Cir. 2012); and *King v. VeriFone Holdings, Inc.*, 12 A.3d 1140 (Del. Sup. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in *Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC*, No. 12-cv-00127 (D. Me.). He represented a consortium of 10 community banks asserting negligence and professional malpractice claims against the former officers and



directors of a bank and its auditor in connection with an \$18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

Mr. Laughlin has also been named a Super Lawyer for 2021.



WILLIAM C. FREDERICKS

PRACTICE EMPHASIS

William Fredericks' practice focuses primarily on litigating securities and other complex commercial class actions.

ADMISSIONS

New York state; United States Supreme Court; United States District Courts for the Southern and Eastern Districts of New York, and the District of Colorado; United States Courts of Appeal for the First, Second, Third, Sixth, and Tenth Circuits

EDUCATION

Columbia University Law School, (J.D., 1988); University of Oxford (M. Litt. in International Relations, 1985); Swarthmore College (B.A. in Political Science, high honors, 1983)

HIGHLIGHTS

Mr. Fredericks is a partner in the firm's New York office. In addition to serving as lead counsel on behalf of investors in several pending securities fraud actions (including cases against Uber, Evoqua Water Technologies and EndoChoice Holdings). Mr. Fredericks also represents investors in the pending FX antitrust litigation brought against over a dozen leading banks based on their involvement in manipulating foreign exchange ("FX") rates and spreads, and in pending proceedings relating to data security breaches at FaceBook, Inc.

Mr. Fredericks has represented investors as a lead or co-lead counsel for plaintiffs in dozens of securities class actions, including *In re Wachovia Preferred Securities and Bond/Notes Litigation* (S.D.N.Y.) (total settlements of \$627 million, reflecting the largest recovery ever in a pure Securities Act case not involving any parallel government fraud claims); *In re Rite Aid Securities Litigation* (E.D. Pa.) (total settlements of \$323 million, including the then-second largest securities fraud settlement ever against a Big Four accounting firm); *In re Sears Roebuck & Co. Sec. Litigation* (N.D. Ill.) (\$215 million settlement, representing the then-largest §10(b) class action recovery in an action that did not involve either a financial restatement or parallel government fraud claims); *In re State Street Bank and Trust Co. ERISA Litigation* (S.D.N.Y.) (one of the largest ERISA class settlements to date); *In re King Digital Sec. Enter. PLC Shareholder Litigation* (Super. Ct. San Fran. Cty.) (\$18.5 million settlement, representing one of the largest state court §11 class action recoveries to date); *Irvine v. ImClone Systems, Inc.* (S.D.N.Y.) (\$75 million §10b settlement); *In re Insulet Sec. Litigation* (D. Mass) (\$19.75 million §10b settlement), and *In re LendingClub Sec. Litigation* (\$125 million §10b and §11 settlement). A consortium of plaintiffs' counsel also chose Mr. Fredericks to present the



(successful) oral argument in opposition to defendants' efforts to dismiss (on grounds of standing) over fifteen separate securities fraud cases before a three judge panel in *In re Mutual Fund Investing Litigation* (see 519 F. Supp. 2d 580 (D. Md. 2007)), which later settled for a combined total of several hundred million dollars. Mr. Fredericks also played a leading role on the team that obtained a rare 9-0 decision for securities fraud plaintiffs in the U.S. Supreme Court in *Merck & Co., Inc. v. Reynolds* (which later settled for \$1.052 billion), and he has also co-authored amicus briefs on behalf of clients in a number of other Supreme Court cases (including *Halliburton*, *Amgen*, *ANZ Securities* and *Cyan*) involving various significant securities law issues.

Mr. Fredericks has also represented clients in litigating claims in federal bankruptcy court proceedings, and obtained substantial recoveries from a bankrupt corporation's officers, law firm and outside auditors on behalf of a court-appointed Trustee of a creditor's trust. See *In re Friedman's, Inc.*, 394 B.R. 623 (S.D. Ga. 2008). He also currently represents a class of large commercial customers of a bankrupt utility in breach of contract proceedings in *In re FirstEnergy Corp.*, pending before the U.S. Bankruptcy Court for the Northern District of Ohio.

At Columbia Law School, Mr. Fredericks was a three-time Harlan Fiske Stone Scholar, a Columbia University International Fellow, Articles Editor of *The Columbia Journal of Transnational Law*, and winner of Columbia's Beck Prize (property law), Toppan Prize (advanced constitutional law) and Greenbaum Prize (written advocacy). A three-judge panel chaired by the late Justice Antonin Scalia also awarded Mr. Fredericks the Thomas E. Dewey Prize for best oral argument in the final round of Columbia's Stone Moot Court Honor Competition. After clerking for the Hon. Robert S. Gawthrop III (E.D. Pa.) in Philadelphia, Mr. Fredericks spent seven years practicing securities and complex commercial litigation at Simpson Thacher & Bartlett LLP and Willkie Farr & Gallagher LLP in New York before moving to the plaintiffs' side of the bar in 1996.

Mr. Fredericks has been recognized in the 2012-21 editions of "America's Best Lawyers" in the field of commercial litigation, in "Who's Who in American Law" (Marquis), and in the New York City "Super Lawyers" listings for securities litigation (2013-21). In 2020 (inaugural) and 2021 he was named to the LawDragon 500 Lead Plaintiff Attorney list. He has been a frequent panelist on various securities litigation programs sponsored by the Practising Law Institute (PLI) – including ten years as a panelist on civil liabilities under the federal Securities Act – and has lectured overseas on American class action litigation on behalf of the American Law Institute/American Bar Association (ALI/ABA). He is also the former chairman of the New York City Bar Association's Committee on Military Affairs and Justice, and a member of the Federal Bar Council.



ANNA HUNANYAN

PRACTICE EMPHASIS

Anna Hunanyan focuses on complex antitrust litigation and class actions.

ADMISSIONS

State of California; State of Massachusetts

EDUCATION

University of California, Los Angeles (Bachelor of Arts, Honors, Business Economics, 2013); Boston College School of Law (Juris Doctor, 2017); Columbia University (Master of International Affairs, 2023)

HIGHLIGHTS

Ms. Hunanyan works primarily in Scott+Scott's Antitrust and Competition Practice. She is presently part of the team that acts as Co-Lead Counsel for the ranchers and exchange classes in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-md-03031 (D. Minn.) She is also active in the Scott+Scott team dedicated to counseling corporates on the private enforcement of competition laws globally. Ms. Hunanyan also serves on the executive committee for *Dennis v. The Andersons, Inc.*, No. 1:20-cv-04090 (N.D. Ill.).

Prior to joining the Firm, Ms. Hunanyan was an associate at Milbank LLP. Her practice there consisted of representing financial institutions and international companies in domestic and cross-border complex transactions and regulatory matters.



CORNELIA GORDON

PRACTICE EMPHASIS

Cornelia Gordon focuses on securities litigation.

ADMISSIONS

State of California; State of New York

EDUCATION

Duke University School of Law (J.D., 2014); Centre College (B.A., 2010, Summa Cum Laude)

HIGHLIGHTS

Cornelia Gordon is an attorney in Scott+Scott's San Diego office.

Prior to joining Scott+Scott, Ms. Gordon worked at a boutique litigation firm where she represented individuals, corporations, and court-appointed receivers and monitors in a variety of white collar civil and criminal matters. Her practice there consisted primarily of complex civil litigation on both the plaintiff and defense side. Before that, Cornelia worked as an associate at Sullivan & Cromwell LLP, where her practice focused on government investigations.



JEFFREY P. JACOBSON

PRACTICE EMPHASIS

Jeffrey P. Jacobson specializes in complex securities and commodities litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: Second Circuit; United States District Courts: Southern, Eastern, and Western Districts of New York

EDUCATION

George Washington University Law School (J.D., High Honors, Order of the Coif, 2017); The George Washington University (B.A., Journalism & Political Science, *summa cum laude*, Distinguished Scholar, 2013)

HIGHLIGHTS

Jeff is a litigation associate in our New York office where he specializes in securities litigation in both federal and state court. Jeff represents pension funds and individuals in their civil suits prosecuting publicly traded companies and their principals for securities fraud and malfeasance. Jeff also represents institutional and individual investors in commodities fraud cases against corporate traders that manipulate the commodities markets.

Jeff was named a Super Lawyers Rising Star by Thompson Reuters in 2021, 2022, 2023, and 2024.

Several of Jeff's recent settlements include:

In re Micro Focus Int'l PLC Secs. Litig., No. 18CIV01549 (Cal. Super. San Mateo Cnty.) (\$107.5M settlement); *In re JPMorgan Precious Metals Spoofing Litig.*, No. 1:18-cv-10356 (S.D.N.Y.) (\$60M settlement); *In re Greensky Sec. Litig.*, No. 1:18 Civ. 11071 (S.D.N.Y.) (\$27.5M settlement); *Abadilla v. Precigen, Inc.*, No. 5:20-cv-06936 (N.D. Cal.) (\$13M settlement); *In re Vaxart, Inc. Sec. Litig.*, No. 3:20-cv-05949 (N.D. Cal.) (\$12.015M partial settlement); *Erie County Emps. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Sup. Ct.) (\$9.5M settlement); *Steamship Trade Ass'n of Baltimore – Int'l Longshoremen's Ass'n Pension Fund v. Olo Inc.*, No. 1:22-cv-08228 (S.D.N.Y. \$9 million settlement); *In re Netshoes Secs. Litig.*, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) (\$8 million settlement); *Plymouth Cnty. Contributory Ret. Sys. v. Adamas Pharms., Inc.*, No. RG19018715 (Cal. Sup. Ct. Alameda Cnty.) (\$7.5M settlement); and *Mo-Kan Iron Workers Pension Fund v. Teligent, Inc.*, No. 1:19-cv-03354 (S.D.N.Y.) (\$6M settlement).
















Prior to joining Scott+Scott, Jeff was a litigation associate at a major international law firm where he represented clients in securities cases, bankruptcy proceedings, and antitrust matters, and advised clients on employment matters.

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MANDEEP S. MINHAS

PRACTICE EMPHASIS

Mr. Minhas is an associate in the Firm's New York office. He specializes in federal and state securities litigation on behalf of individual and institutional shareholders. Before joining Scott+Scott, Mr. Minhas was an associate at a trial firm in New York. He has represented plaintiffs on complex international matters including unfair competition, racketeering, and human trafficking.

ADMISSIONS

State of New York; U.S. District Courts for the Southern, Eastern, and Northern Districts of New York

EDUCATION

Boston College Law School (J.D., 2020); Columbia University (M.A., 2016); University of Texas (B.A., 2013)



MARC J. GRECO

PRACTICE EMPHASIS

Mr. Greco is an associate in the Firm's New York office, where he primarily represents clients in securities litigation matters.

ADMISSIONS

United States District Courts: Southern District of New York and the Eastern District of New York

EDUCATION

William & Mary Law School (J.D., 2018); Boston University (B.A., 2015)

HIGHLIGHTS

Prior to joining the Firm, Mr. Greco spent over four years as an associate at two leading defense firms, where he represented clients in all manner of complex civil litigation and arbitration, as well as criminal investigations and regulatory enforcement actions. The practice areas in which he worked ranged from antitrust, unfair competition, and securities to consumer protection, intellectual property, and contracts.

During law school, Mr. Greco served as the Senior Articles Editor of the William & Mary Law Review, and also as a judicial intern to the Honorable Paul E. Davison of the U.S. District Court for the Southern District of New York.



MATTHEW PELLER

PRACTICE EMPHASIS

Matthew Peller focuses on securities class actions and other complex shareholder litigation.

ADMISSIONS

States of New York and New Jersey; United States District Courts: Southern District of New York, Eastern District of New York, Southern District of Texas, Western District of Pennsylvania, Western District of Wisconsin, District of Colorado; United States Courts of Appeals: United States Court of Appeals for the Second Circuit, United States Court of Appeals for the Fifth Circuit; United States Supreme Court

EDUCATION

Cornell Law School (J.D., 2006); Cornell University (B.S., Industrial and Labor Relations, 2003)

HIGHLIGHTS

Matthew Peller is an attorney in Scott+Scott's New York office.

Mr. Peller has more than 15 years of experience litigating all aspects of complex shareholder actions in federal and state courts, including both prosecuting and defending class and individual securities fraud actions. Mr. Peller is well-versed in litigating novel procedural, liability, and damages issues, class certification issues, contested fee applications, and settlement objections. He also has extensive experience working on complex litigation involving non-U.S. issuers, including addressing Australian, Brazilian, Canadian, Dutch, English, Israeli, and Mexican law issues.

Following law school, Mr. Peller clerked for the Honorable Roger L. Gregory, United States Circuit Court Judge for the U.S. Court of Appeals for the Fourth Circuit.

Prior to joining Scott+Scott, Mr. Peller defended complex securities and other shareholder actions for more than 10 years at Sullivan & Cromwell LLP and prosecuted individual securities and shareholder actions at Rolnick Kramer Sadighi LLP.

REPRESENTATIVE CASES

- *Amici* brief concerning treatment of Pershing Square Tontine SPAC under the Investment Company Act of 1940



MOLLIE CHADWICK

PRACTICE EMPHASIS

Mollie Chadwick is a litigation associate in Scott+Scott's San Diego office specializing in securities litigation in both federal and state court. Currently, she is working on cryptocurrency class actions.

ADMISSIONS

State of California

EDUCATION

Whittier Law School (J.D., 2017); University of California, Santa Cruz (B.A., Politics & Legal Studies, 2011, Women's Water Polo 2007-2011, Captain 2009-2011)

HIGHLIGHTS

Mollie is an associate in our San Diego office where she focuses on federal securities litigation.

Prior to joining Scott+Scott, Mollie was an associate at a California plaintiff's employment law firm where she represented clients in wrongful termination, discrimination, and wage and hour cases.

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Journal of International Business and Law

1. 本報告係根據本公司及子公司之會計帳簿及相關資料，並參考獨立會計師事務所之查核報告而編製。

2. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

3. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

4. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

5. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

6. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

7. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

8. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

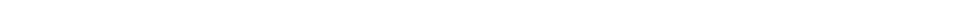
9. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

10. 本公司及子公司之會計帳簿及相關資料，業經本公司及子公司之會計人員及會計師查核，並由會計師出具查核報告。

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- 2019年，中国科学院南京地质古生物研究所的科学家在贵州纳雍县发现了距今约2.5亿年的三叶虫化石，这是目前在中国发现的最早的三叶虫化石之一。
- 2020年，中国科学院南京地质古生物研究所的科学家在贵州纳雍县发现了距今约2.5亿年的三叶虫化石，这是目前在中国发现的最早的三叶虫化石之一。
- 2021年，中国科学院南京地质古生物研究所的科学家在贵州纳雍县发现了距今约2.5亿年的三叶虫化石，这是目前在中国发现的最早的三叶虫化石之一。

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Severt v. UiPath, Inc.



RHIANA SWARTZ

PRACTICE EMPHASIS

Rhiana Swartz's practice primarily focuses on case development including identifying, investigating, and initiating complex federal and state securities class actions on behalf of institutional and individual investors. She also litigates these matters, with a focus on leadership issues. Ms. Swartz is also involved in shareholder derivative actions and other complex commercial matters.

ADMISSIONS

State of New York; United States Courts of Appeal: Second Circuit; United States District Courts: Southern and Eastern Districts of New York, District of Colorado

EDUCATION

Brooklyn Law School (J.D., *magna cum laude*); Swarthmore College (B.A.)

HIGHLIGHTS

Prior to joining Scott+Scott, Ms. Swartz was Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, Office of the Corporation Counsel, where she defended federal civil rights cases from initial receipt of complaint through trial verdict.

Ms. Swartz also spent more than four years as an associate at Sullivan & Cromwell LLP in New York, representing major financial institutions in civil and regulatory matters involving securities, antitrust, corporate governance, and employment law issues.

Ms. Swartz clerked for the Honorable Joan M. Azrack in the Eastern District of New York.

REPRESENTATIVE CASES

Ms. Swartz has helped secure Scott+Scott's leadership in many federal and state class actions, including: *Corwin v. ViewRay, Inc.*, No. 1:19-cv-02115 (N.D. Ohio); *In re Weight Watchers Int'l, Inc. Sec. Litigation*, No. 1:19-cv-02005 (S.D.N.Y.); *Mustafin v. GreenSky, Inc.*, No. 1:18-cv-11071 (S.D.N.Y.); *In re Evoqua Water Techs. Corp. Sec. Litigation*, No. 1:18-cv-10320 (S.D.N.Y.); *Kanugonda v. Funko, Inc.*, No. 2:18-cv-00812 (W.D. Wash.); *Silverberg v. DryShips Inc.*, No. 2:17-cv-04547 (E.D.N.Y.); *Robinson v. Diana Containerships Inc.*, No. 2:17-cv-06160 (E.D.N.Y.); and *In re Altice USA, Inc. Sec. Litigation*, Index No. 711788/2018 (NY Sup. Ct. Queens Cty.).



SUSAN HU

PRACTICE EMPHASIS

Susan Hu is an associate in the Firm's New York office where she represents clients in securities litigation matters.

Ms. Hu served as a Notes Editor on the NYU Law Review and clerked for Chief Judge Jerome B. Simandle in the District of New Jersey. Prior to clerking, she worked for the Center for Constitutional Rights, where she litigated national security and international human rights cases. She previously practiced at Arnold & Porter LLP and Dontzin Nagy and Fleissig, LLP, where she focused on complex commercial litigation and product liability cases.

ADMISSIONS

United States District Court for the Southern and Eastern Districts of New York; United States District Court for the District of Columbia; United States Court of Appeals for the First Circuit; United States Supreme Court

EDUCATION

New York University School of Law (J.D.); Columbia University (B.A.)

HIGHLIGHTS

- Clerked for the Honorable Jerome B. Simandle, District of New Jersey

