

1 THE HONORABLE KAREN DONOHUE

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8 **SUPERIOR COURT OF WASHINGTON IN AND FOR KING COUNTY**

9 IN RE FUNKO, INC. SECURITIES
10 LITIGATION,

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 18-2-14811-1 SEA)

13 CLASS ACTION

14 **DECLARATION OF JULI E. FARRIS**
15 **FILED ON BEHALF OF KELLER**
16 **ROHRBACK L.L.P. IN SUPPORT OF**
17 **APPLICATION FOR AWARD OF**
18 **ATTORNEY'S FEES AND**
19 **EXPENSES**

20 I, Juli E. Farris, declare as follows:

21 1. I am over the age of 21, have personal knowledge of the matters set forth herein,
22 and am competent to testify.

23 2. I am a partner with the firm of Keller Rohrbach L.L.P. ("Keller Rohrbach" or the
24 "Firm"). I am submitting this declaration in support of the application for an award of attorneys'
25 fees and expenses in connection with services rendered in the above-entitled action.

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DECL. OF JULI E. FARRIS ON BEHALF OF KELLER
ROHRBACK L.L.P. IN SUPP. OF APP. FOR AWARD OF
ATTYS. FEES AND EXPENSES- 1

KELLER ROHRBACK L.L.P.

1201 Third Avenue, Suite 3400
Seattle, WA 98101-3052
TELEPHONE: (206) 623-1900
FACSIMILE: (206) 623-3384

1 3. Keller Rohrback is the Court-appointed Liaison Counsel for the Court-appointed
2 Class Representatives Robert Lowinger, The Ronald and Maxine Linde Foundation, Carl
3 Berkelhammer, and the certified Class in the above-captioned securities class action.

4 4. The information in this declaration regarding the Firm's time and expenses is
5 taken from time and expense reports and supporting documentation prepared and/or maintained
6 by the Firm in the ordinary course of business. I am the partner who oversaw and/or conducted
7 the day-to-day activities in the litigation and I reviewed these reports (and backup documentation
8 where necessary or appropriate) in connection with the preparation of this declaration. The
9 purpose of this review was to confirm both the accuracy of the entries as well as the necessity
10 for, and reasonableness of, the time and expenses committed to the litigation. As a result of this
11 review, reductions were made to both time and expenses in the exercise of billing judgment. In
12 addition, the time submitted does not include time of attorneys or personnel expended since
13 preliminary approval, or time that will be expended on an on-going basis to assist with settlement
14 administration, communications with claimants, or other activities before and after the settlement
15 is approved and disbursed. Based on this review and the adjustments made, I believe that the
16 time reflected in the Firm's lodestar calculation and the expenses for which payment is sought
17 are reasonable and were necessary for the effective and efficient prosecution and resolution of
18 the litigation.

19 5. After the reductions referenced above, the number of hours spent on the litigation
20 by my Firm, through February 12, 2025, the date the Court entered its Order Preliminarily
21 Approving Settlement, is 5,066.9. A breakdown of the lodestar is provided in Exhibit A. The
22 lodestar amount for attorney/paraprofessional time based on the Firm's current rates is
23 \$3,114,820.50. The hourly rates shown in Exhibit A are consistent with hourly rates submitted
24 by the Firm in other securities class action litigation. The Firm's rates are set based on periodic
25 analysis of rates charged by firms performing comparable work both on the plaintiff and defense
26 side. Different timekeepers within the same employment category (e.g., partners, associates,

1 paralegals, etc.) may have different rates based on a variety of factors, including years of practice,
2 years at the Firm, years in the current position (*e.g.*, years as a partner), relevant experience,
3 relative expertise, and the rates of similarly experienced peers at this Firm or other firms. For
4 personnel who are no longer employed by the Firm, the “current rate” used for the lodestar
5 calculation is based upon the rate for that person in his or her final year of employment with the
6 Firm.

7 6. My Firm seeks an award of \$49,956.74 in expenses and charges in connection
8 with the prosecution of the litigation. Those expenses and charges are summarized by category
9 in Exhibit B.

10 7. The following provides additional information regarding certain of the expenses
11 reflected in Exhibit B:

12 a) Contribution to Common Litigation Fund: \$36,000. Keller Rohrback
13 contributed to the common litigation fund maintained by Robbins Geller Rudman & Dowd LLP.

14 b) Filing and Other Fees: \$5,982.95. These expenses have been paid to the
15 Court for filing fees and to attorney service firms or individuals who either (i) served process of
16 subpoenas, or (ii) obtained copies of court documents for plaintiffs. The vendors who were paid
17 for these services are King County Superior Court, the Washington State Bar Association,
18 CourtTrax, and Pacer.

19 c) Court Hearing and Deposition Reporting, and Transcripts: \$533.98. The
20 vendors who were paid for these services are Ballard Transcription and Katherine Caldwell.

21 d) Photocopies: \$1,441.40. In connection with this case, the Firm made
22 2,932 in-house black-and-white photocopies, charging \$0.20 per copy for a total of \$586.40, and
23 900 in-house color photocopies, charging \$0.95 per copy for a total of \$855.00. Each time an in-
24 house copy machine is used, our billing system requires that a case or administrative billing code
25 be entered and that is how the 2,932 black-and-white copies and 900 color copies were identified
26 as related to this case.


1 e) Online Legal Research: \$5,686.26. This category includes vendors such
2 as LexisNexis and Westlaw. These resources were used to obtain access to legal research and
3 for cite-checking of briefs. This expense represents the expense incurred by Keller Rohrbach for
4 use of these services in connection with this litigation. The charges for these vendors vary
5 depending upon the type of services requested.

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

9 9. An abbreviated Firm resume, which provides additional information and
10 background regarding Keller Rohrbach, and biographies of each attorney who devoted
11 significant time to this litigation is attached as Exhibit C. A more complete description of the
12 firm and the 70 attorneys in our seven offices, is contained in our complete resume, available
13 upon request, or on the firm's website, www.kellerrohrbach.com.

14
15 I declare under penalty of perjury under the laws of the State of Washington that the
16 foregoing is true and correct. Executed this 28th day of April 2025 at Seattle, Washington.

17
18 s/



Juli E. Farris, WSBA #17593
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3400
Seattle, WA 98101
Phone: (206) 623-1900
jffarris@kellerrohrbach.com

EXHIBIT A

EXHIBIT A

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

KELLER ROHRBACK L.L.P.

Inception through February 12, 2025

NAME		HOURS	RATE	LODESTAR
Juli Farris	(P)	646.0	\$1,190	\$768,740.00
Eric Laliberte	(P)	513.7	\$525	\$269,692.50
Keil Mueller	(P)	322.0	\$990	\$318,780.00
Eric Fierro	(P)	40.8	\$910	\$37,128.00
Beth Leland	(P)	18.6	\$735	\$13,671.00
Norjmoo Battulga	(A)	182.8	\$545	\$99,626.00
Chris Ryder	(A)	140.6	\$545	\$76,627.00
Robert Bard	(DA)	48.0	\$480	\$23,040.00
Quiana Cash	(DA)	95.5	\$480	\$45,840.00
Charles Kish	(DA)	2,464.3	\$480	\$1,182,864.00
Deborah Mack	(DA)	264.8	\$480	\$127,104.00
Paralegals		329.8	\$460	\$151,708.00
TOTAL		5,066.9		\$3,114,820.50

(P) Partner

(A) Associate

(DA) Discovery Associate

EXHIBIT B

EXHIBIT B

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

KELLER ROHRBACK L.L.P.

Inception through February 12, 2025

CATEGORY		AMOUNT
Common Litigation Fund		\$36,000.00
Filing and Other Fees		\$5,982.95
Postage		\$31.62
Messenger, Overnight Delivery		\$280.53
Court Hearing and Deposition Reporting, and Transcripts		\$533.98
Photocopies		\$1,441.40
In-House black-and white: (2,932 copies at \$0.20 per page)	\$586.40	
In-House color: (900 copies at \$0.95 per page)	\$855.00	
Online Legal Research		\$5,686.26
TOTAL		\$49,956.74

EXHIBIT C

EXHIBIT C

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

KELLER ROHRBACK L.L.P. ABBREVIATED FIRM RESUME

COMPLEX LITIGATION

Devoted to Justice

"[Keller Rohrback] has performed an important public service in this action and has done so efficiently and with integrity . . . [Keller Rohrback] has also worked creatively and diligently to obtain a settlement from WorldCom in the context of complex and difficult legal questions."

In re WorldCom, Inc. ERISA Litig., No. 02-4816, 2004 WL 2338151, at *10 (S.D.N.Y. Oct. 18, 2004) (Cote, J.)

Keller Rohrback's lawyers excel by being prepared and persuasive. It's a simple formula that combines our strengths: outstanding writing and courtroom skill, together with unparalleled passion and integrity. We have recovered billions of dollars for our clients and have served as lead counsel in many prominent cases, including numerous financial crisis cases against Wall Street banks and mortgage originators. Our lawyers are recognized as leaders in their fields who have dedicated their careers to combating corporate fraud and misconduct. We have the talent as well as the financial resources to litigate against Fortune 500 companies—and do so every day.



Who We Are



Keller Rohrback's Complex Litigation Group has a national reputation as the go-to plaintiffs' firm for large-scale, complex individual and class action cases. We represent public and private investors, businesses, governments and individuals in a wide range of actions, including securities fraud, fiduciary breach, antitrust, insurance coverage, whistleblower, environmental, and product liability cases. Our approach is straightforward—we represent clients who have been harmed by conduct that is wrong, and we litigate with passion and integrity to obtain the best results possible. Every case is different, but we win for the same reason: we are persuasive. When you hire us, you hire smart, creative lawyers who are skilled in court and in negotiations.

Founded in 1919, Keller Rohrback's over 60 attorneys and more than 100 staff members are based in eight offices across the country in Seattle, Denver, Missoula, New York, Oakland, Phoenix, Portland, and Santa Barbara. Over the past century, our firm has built a distinguished reputation by providing top-notch representation. We offer exceptional service and a comprehensive understanding of federal and state law nationwide. We also are well known for our abilities to collaborate with co-counsel and to work together to achieve outstanding results—essential skills in large-scale cases in which several firms represent the plaintiffs. We pride ourselves on our reputation for working smartly with opposing counsel, and we are comfortable and experienced in coordinating high-stakes cases with simultaneous state and federal government investigations. Keller Rohrback attorneys earn the respect of our colleagues and our opponents through our deft handling of the array of complex issues and obstacles our clients face.

ABOUT KELLER ROHRBACK



What We Do

Keller Rohrback's Complex Litigation Group represents plaintiffs in large-scale cases involving corporate wrongdoing. We litigate against companies that pollute, commit fraud, fix prices and take advantage of consumers, employees, and investors. We are passionate advocates for justice. In addition, the Complex Litigation Group regularly calls on attorneys in the firm's other practice areas for expertise in areas such as bankruptcy, constitutional law, corporate transactions, financial institutions, insurance coverage and intellectual property. Our group's access to these in-house resources distinguishes Keller Rohrback from other plaintiffs' class action firms and contributes to the firm's success. We also have a history of working with legal counsel from other countries to vigorously pursue legal remedies on behalf of clients around the globe.

We have won verdicts in state and federal courts throughout the nation and have obtained judgments and settlements on behalf of clients exceeding \$94.9 billion. Courts around the country have praised our work, and we are regularly appointed lead counsel in nationally prominent class action cases. Our work has had far-reaching impacts for our clients in a variety of settings and industries, creating a better, more accountable society.

Whom We Serve

We represent individuals, institutions, and government agencies. The common denominators of our clients is a desire to see justice done—and to be represented by attorneys who practice law with integrity, honesty, and devotion to serving our clients' interests.



"Despite substantial obstacles to recovery, Keller Rohrback L.L.P. was willing to undertake the significant risks presented by this case . . . Class Counsel achieved real and substantial benefits for members of the Class. [Their] extensive prior experience in complex class action securities litigation . . . enabled the Class to analyze and achieve this excellent result." Order at 2, Getty v. Harmon (SunAmerica Sec. Litig.), No. 98-178 (W.D. Wash. Sept. 20, 1999) (Dwyer, J.)

ATTORNEYS

Lynn Lincoln Sarko
Alison Chase
Juli Farris
Laura Gerber
Matthew Gerend
Gary A. Gotto
Benjamin Gould
Dean N. Kawamoto
Ron Kilgard
David Ko
Eric Laliberte
Derek Loeser
Ryan McDevitt
Matt Melamed
Erin Riley
Havila C. Unrein
Jen Wagner
Michael Woerner

Keller Rohrback enjoys a national reputation for excellence in prosecuting securities and financial fraud matters. We represent a variety of investors ranging from classes of individuals to large institutions. Many of our cases reflect recent financial scandals: we are pursuing claims against a group of international banks for rigging LIBOR; we represent investors in connection with their purchases of billions of dollars of mortgage-backed securities; and we pursued claims on behalf of employee benefit plans in connection with the Madoff Ponzi scheme. While our experience is diverse, our approach is simple and straightforward: we master the factual and legal bases for our claims with a focus on providing clear and concise explanations of the financial fraud and why our clients are entitled to recover.

REPRESENTATIVE CASES

Federal Home Loan Bank Litigation

Keller Rohrback has played a prominent role in large securities fraud and other investment cases litigated across the country involving mortgage-backed securities. Keller Rohrback has been retained by several Federal Home Loan Banks (FHLBs) to pursue securities and common law claims against dozens of issuers, underwriters, and sponsors of mortgage-backed securities. The FHLB complaints named more than 120 defendants and involved over 200 securities with a collective original face value of \$13 billion. The relief sought by the FHLBs includes rescission and damages under state blue sky laws and the federal securities laws. We have recovered hundreds of millions of dollars on behalf of our clients to date.

In re the Bank of N.Y. Mellon (as Trustee), No. 651786/11 (N.Y.

Sup. Ct.)

Keller Rohrback was a member of the three-firm steering committee addressing significant mortgage repurchase issues that impacted institutional investors. Keller Rohrback represented certificate holders who intervened in a proposed \$8.5 billion settlement initiated by Bank of New York Mellon, as Trustee of 530 Countrywide mortgage-backed securities trusts. Our firm played a lead role in discovery and the eight-week bench trial in New York contesting the fairness of the settlement. The objection we pursued and tried was the only objection the trial court sustained.

In re LIBOR-Based Fin. Instruments Antitrust Litig., No. 11-2262 (S.D.N.Y.)

Keller Rohrback represents institutional funds pursuing antitrust claims based on the manipulation of the London Interbank Offered Rate (LIBOR) by the international panel of banks entrusted to set that rate. Multiple government investigations have revealed that certain panel banks manipulated LIBOR to mislead the markets and investors about the state of their financial health. The case is in discovery.

Diebold v. Northern Tr. Invs., N.A., No. 09-1934 (N.D. Ill.)

Keller Rohrback was Class Counsel in this class action litigation against Northern Trust alleging that Northern Trust imprudently structured and managed its securities lending program by improperly investing cash collateral in long term debt, residential mortgage-backed securities, structured investment vehicles ("SIVs"), and other risky and illiquid assets. On August 7, 2015, Judge Susan E. Cox approved the allocation plan for a \$36 million settlement.

REPRESENTATIVE CASES continued

Louisiana Firefighters' Ret. Sys. v. Northern Tr. Invs., N.A., No. 09-7203 (N.D. Ill.)

Keller Rohrback was Co-Lead Counsel in this securities lending litigation, a class action brought on behalf of four public retirement systems alleging that Northern Trust breached its fiduciary and contractual duties to investors when it imprudently structured and managed its securities lending program by improperly investing cash collateral in long-term debt, residential mortgage-backed securities, SIVs, and other risky and illiquid assets, rather than conservative, liquid investments. Plaintiffs allege that Northern Trust's imprudent management of the collateral pools caused Plaintiffs and other investors to suffer hundreds of millions of dollars in losses. On May 6, 2011, the Honorable Robert W. Gettleman denied in significant part Defendants' motion to dismiss. Plaintiffs also successfully defeated Defendants' third party complaint. The Court thereafter approved a partial settlement of \$24 million in cash, plus interest earned thereon, which represents settlement of the indirect lending claims of settlement class members.

In re Bank of N.Y. Mellon Corp. Forex Transactions Litig., No. 12-2335 (S.D.N.Y.)

Keller Rohrback served as Lead ERISA Counsel in this class action against the Bank of New York Mellon ("BNY Mellon") arising from its undisclosed charges for Standing Instruction Foreign Currency ("SI FX") transactions. Plaintiffs allege that between January 12, 1999 and January 17, 2012, BNY Mellon breached its fiduciary duties by failing to prudently and loyally manage the Plan's foreign currency transactions in the best interests of the participants, failing to disclose fully the details of the relevant SI FX transactions it was undertaking on behalf of the Plans, and engaging in prohibited transactions. In March 2015, a global resolution of the private and governmental enforcement actions was announced in which \$504 million will be paid back to BNY Mellon customers—\$335 million of which is directly attributable to funds received in the class litigation.

Madoff Direct & Feeder Fund Litigation: Hartman v. Ivy Asset Mgmt. LLC, No. 09-8278 (S.D.N.Y.)

Keller Rohrback successfully litigated this direct action on behalf of the trustees of seventeen employee benefit plans damaged by the Madoff Ponzi scheme. The action alleged that Ivy Asset Management and J.P. Jeanneret Associates, Inc. breached their fiduciary duties under ERISA by causing the plans to be invested directly or indirectly in Madoff funds. Keller Rohrback obtained a settlement of over \$219 million in this case and related actions, including claims brought by the United States Secretary of Labor and the New York Attorney General.

In re IKON Off. Sols., Inc. Sec. Litig., MDL No. 1318 (E.D. Pa.)

Keller Rohrback served as Co-Lead Counsel representing the City of Philadelphia and eight other lead Plaintiffs in this certified class action alleging securities fraud. Class counsel achieved the highest securities fraud settlement at that time in the Eastern District of Pennsylvania by settling with Defendant IKON Office Solutions, Inc. for \$111 million. The settlement was listed as one of the "largest settlements in class-action securities-fraud lawsuits since Congress reformed securities litigation in 1995" by *USA Today*.

In re Apple Comput., Inc. Derivative Litig., No. 06-4128 (N.D. Cal.)

Keller Rohrback served on the Management Committee in this federal derivative shareholder action against nominal Defendant Apple Computer, Inc. and current and former directors and officers of Apple. Plaintiffs pursued breach of fiduciary duty, unjust enrichment, and gross mismanagement claims arising from backdated stock options granted between 1993 and 2001, which diverted millions of dollars of corporate assets to Apple executives. We achieved a settlement that awarded \$14 million—one of the largest cash recoveries in a stock backdating case—and that required Apple to adopt a series of unique and industry-leading corporate enhancements.



LYNN LINCOLN SARKO

CONTACT INFO

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lsarko@kellerrohrback.com

PRACTICE EMPHASIS

- Antitrust & Trade Regulation
- Appeals
- Class Actions
- Constitutional Law
- Commodities & Futures Contracts
- Consumer Protection
- Data Privacy Litigation
- Employment Law
- Environmental Litigation
- Employee Benefits & Retirement Security
- Financial Products & Services
- Government & Municipalities
- Institutional Investors
- Intellectual Property
- International Law
- Mass Personal Injury
- Securities & Financial Fraud
- Whistleblower

Managing Partner Lynn Sarko uses thoughtful innovation to solve complex issues. Having led Keller Rohrback L.L.P.'s Complex Litigation Group since its inception over 30 years ago, Lynn's work has led to new developments in case law and significant, impactful settlements for his clients.

A dynamic leader with a tenacious dedication to justice, Lynn has been selected by courts across the nation to serve in key leadership roles in a wide variety of cutting-edge cases. Namely, he was appointed Co-Lead counsel for *In re EpiPen (Epinephrine Injection, USP) Mktg., Sales Practices & Antitrust Litigation*, MDL No. 2785 (D. Kan.), the nationwide class action against pharmaceutical company Mylan and others for anticompetitive and unfair business practices in its sale and marketing of the EpiPen Auto-Injector device. He was also selected to serve in a leadership position on behalf of governmental entities and other plaintiffs in the vast litigation regarding the nationwide prescription opioid epidemic, *In re National Prescription Opiate Litigation*, MDL No. 2804 (N.D. Ohio). The National Law Journal referred to this leadership team as a "Who's Who" in mass torts."

Some of Lynn's other remarkable successes include consumer protection cases aimed at holding automotive companies accountable for wrongdoing. One such case was *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2672 (N.D. Cal.), for which Lynn was appointed to the Plaintiffs' Steering Committee—a group referred to as a "class action dream team." The case settled for over \$17 billion. Lynn was also appointed to the Plaintiffs' Steering Committee for *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2777 (N.D. Cal.), which settled for \$307.5 million, including required emissions modifications for 100,000 eligible vehicles. In addition to consumer protection cases, Lynn has also served in leadership positions for cases involving financial fraud and breaches of fiduciary duty. He was selected to lead teams of attorneys representing plaintiffs in the litigations against Enron, Worldcom, and Madoff—three of the biggest financial frauds of our time.

Lynn is widely renowned within the legal community and beyond for his diplomacy and fearless devotion to justice. He was a member of the legal team nominated for the 2016 Nobel Peace Prize for seeking enforcement of the Nuclear Non-Proliferation Treaty on behalf of the Republic of the Marshall Islands. He was also honored to receive the Trial Lawyers for Public Justice Trial Lawyer of the Year Award for his work on the Exxon Valdez Oil Spill trial team, and he was one of four Washington lawyers recognized as one of the 500 "Leading Lawyers in America" by Lawdragon. He is also AV-rated by Martindale-Hubbell and has been consecutively named to the Washington Super Lawyers list for 21 years.

Lynn holds a BBA and an MBA in accounting and finance from the University of Wisconsin, where he also served as an accounting instructor. He graduated with his J.D. from the University of Wisconsin Law school, where he was Editor-in-Chief of the Wisconsin Law Review and received the faculty award given to the

KELLER ROHRBACK

LAW OFFICES ♦ L. L. P.

most outstanding member of the graduating class.

Prior to joining Keller Rohrback, Lynn was an Assistant United States Attorney for the District of Columbia, Criminal Division, an associate at the Washington D.C office of Arnold & Porter, and law clerk to the Honorable Jerome Farris, United States Court of Appeals for the Ninth Circuit, in Seattle.

EDUCATION

University of Wisconsin

B.B.A., 1977

University of Wisconsin

M.B.A., 1978, *Beta Alpha Psi*

University of Wisconsin

J.D., 1981, *Order of the Coif*; Editor-in-Chief, *Wisconsin Law Review*; Salmon Dalberg Award (outstanding graduate)

BAR & COURT ADMISSIONS

1981, Wisconsin

1981, U.S. Court of Appeals for the Ninth Circuit

1983, District of Columbia Court of Appeals

1984, District of Columbia

1984, U.S. District Court for the District of Columbia

1984, United States Supreme Court

1984, U.S. Court of Appeals for the Seventh Circuit

1984, U.S. Court of Appeals for the Fourth Circuit

1984, U.S. Court of Appeals for the Tenth Circuit

1984, U.S. Tax Court

1986, Washington

1986, U.S. District Court for the Western District of Washington

1988, U.S. District Court for the Eastern District of Wisconsin

1989, U.S. District Court for the Eastern District of Washington

1996, U.S. District Court for the Western District of Wisconsin

1997, U.S. District Court for the District of Colorado

2001, U.S. Court of Appeals for the Third Circuit

2002, U.S. District Court for the Eastern District of Michigan

2003, U.S. Court of Appeals for the Fifth Circuit

2003, U.S. Court of Appeals for the Eleventh Circuit

2004, U.S. District Court for the Northern District of Illinois

2008, U.S. Court of Appeals for the Eighth Circuit

2009, U.S. Court of Appeals for the Sixth Circuit

2010, U.S. District Court for North Dakota

2013, U.S. Court of Appeals for the Second Circuit

2016, U.S. District Court for the Central District of Illinois

2016, U.S. District Court for the Southern District of Illinois

2018, U.S. Court of Appeals for the First Circuit

2019, Arizona

2024, U.S. Court of Appeals for the Fourth Circuit

HONORS & AWARDS

The Best Lawyers in America®, Seattle, Washington, 2025 (Recognized since 2024)

- Litigation - Antitrust
- Litigation - ERISA
- Mass Tort Litigation / Class Actions – Plaintiffs

Ranked in Chambers and Partners USA Guide, 2024 - ERISA Litigation: Mainly Plaintiffs

Lawdragon, 500 Leading Plaintiff Financial Lawyers, 2023-2024

Law360 Titans of The Plaintiffs Bar honoree, 2023

KELLER ROHRBACK

L A W O F F I C E S ♦ L . L . P .

American Antitrust Institute - Antitrust Enforcement Award Honoree, in the category of "Outstanding Antitrust Litigation Achievement in Private Law Practice" for work in *In re EpiPen Marketing, Sales Practices, and Antitrust Litigation*, 2022

Selected to Super Lawyers list in *Super Lawyers - Washington*, 1999-2024

National Trial Lawyers: Top 100 Civil Plaintiff Trial Lawyers in Washington

Lawdragon, 500 Leading Lawyers in America, 2018 2022-2025

Fellow of the American Bar Foundation

Avvo Top Tax Lawyer, Washington CEO Magazine

Trial Lawyer of the Year, Trial Lawyers for Public Justice Salmon Dalberg Award

Fellow of the American Bar Foundation

SELECTED PUBLICATIONS & PRESENTATIONS

Presenter, *Statewide Opioid Litigation Update*, Colorado County Attorneys Association Virtual Summer Conference (June 11, 2021).

Stock Drop and Roll: Key Supreme Court Rulings and New Standards in ERISA "Stock Drop" Cases, Thomson/West Webinar, (July 24, 2014).

14th Annual Pension Law, Governance and Solvency Conference (2013).

Canadian Institute's 14th Annual Advanced Forum on Pension Law, Governance and Solvency (2013).

ERISA Litigation & Regulatory Compliance Congress (2013).

American Conference Institute's 6th National Forum on ERISA Litigation (2013).

25th Annual ERISA Litigation Conference (2012).

American Conference Institute's 5th National Forum on ERISA Litigation (2012).

PROFESSIONAL & CIVIC INVOLVEMENT

American Bar Association, *Member*

Bar Association of The District of Columbia, *Member*

Federal Bar Association, *Member*

King County Bar Association, *Member*

State Bar of Wisconsin, *Member*

Trial Lawyers for Public Justice, *Member*

Washington State Bar Association, *Member*

Washington State Trial Lawyers Association, *Member*

American Association for Justice, *Member*

The Association of Trial Lawyers of America, *Member*

American Academy of Trial Counsel, *Fellow*

Editorial Board, *Washington State Securities Law Deskbook*

American Bar Foundation, *Fellow*

Human Rights Watch Committee

Washington Athletic Club, *Member*



JULI FARRIS

CONTACT INFO

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Santa Barbara, CA 93101
(805) 456-1496

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Seattle, WA 98101
(206) 623-1900

jfarris@kellerrohrback.com

PRACTICE EMPHASIS

- Antitrust and Trade Regulation
- Class Actions
- Consumer Protection
- Data Breach
- Employee Benefits & Retirement Security
- Environmental Litigation
- Fiduciary Breach
- Governments and Municipalities
- International Law
- Securities
- Whistleblower

Juli Farris' clients count on her commitment to excellence to meet their legal needs.

Juli has been a member of Keller Rohrback's nationally-recognized Complex Litigation Group for more than 30 years, and has played a key role in many of the firm's most significant and groundbreaking class action lawsuits. She currently serves as co-lead counsel representing fishers, property owners and other victims of the 2015 oil spill resulting from the rupture of the Plains' All American Pipeline near Santa Barbara, and as co-lead counsel representing consumers in litigation against Rodan & Fields, each of which resulted in landmark settlements. She is actively involved in the firm's representation of victims of the Blackbaud data breach, which impacted millions of non-profit donors and hospital patients and victims of the recent T-Mobile data breach. She is also part of the team pursuing claims to hold drug manufacturers accountable for the current opioid health crisis, representing cities and counties in California in that multi-district litigation and related intrastate negotiations, and represents patients affected by outsized pricing of Insulin and other essential drugs.

In addition to her work on environmental torts, consumer protection and whistleblower litigation, Juli has represented both plaintiffs and defendants in state and federal litigation involving banking and securities regulation, antitrust, ERISA fraud and other areas, including key roles in antitrust litigation against the airlines industry and carpet manufacturers, ERISA company stock cases against WorldCom and Enron among others, and securities litigation against Ikon, Phillip Morris and other entities.

After graduation from Stanford Law School, Juli served as a judicial law clerk for Judge E. Grady Jolly of the U.S. Court of Appeals, Fifth Circuit, and practiced law at Sidley Austin in Washington D.C., on litigation and appeals covering a wide array of subject matters.

EDUCATION

Stanford University

B.A., 1982, English

Stanford Law School

J.D., 1987, Notes Editor, *Stanford Law Review*

BAR & COURT ADMISSIONS

1988, Washington

1989, California

1990, District of Columbia

1995, Western District of Washington

1997, U.S. Court of Appeals for the Ninth Circuit

KELLER ROHRBACK

LAW OFFICES ♦ L.L.P.

1999, Central District of California
2000, Northern District of California
2001, Eastern District of California
2003, Southern District of California
2003, U.S. Court of Appeals for the Fifth Circuit
2003, U.S. Court of Appeals for the Eleventh Circuit
2022, Eastern District of Michigan

PROFESSIONAL & CIVIC INVOLVEMENT

King County Bar Association, *Member*
Loren Miller Bar Association, *Member*
American Bar Association, *Member*
California State Bar Association, *Member*
Washington State Bar Association, *Member*
Washington State Association for Justice, *Member*
Santa Barbara County Bar Association, *Member*
Santa Barbara Women Lawyers, *Member*
American Bar Foundation, *Member*
The National Association of Public Pension Attorneys, *Member*
Legal Foundation of Washington, *Vice President*
Seattle Rep Theater Board of Trustees, *Vice President*
Seattle Art Museum Board of Trustees, *Member*
Black Trustee Alliance for Art Museums, *Member*
Treehouse, *Board Member Emeritus, Past Board Chair*
Susan G. Komen, Puget Sound Affiliate, *Former Board Member*

PUBLICATIONS & PRESENTATIONS

Editorial Board, *Washington State Securities Law Deskbook* (2012)
Co-author with Andrew D. Freeman, *Grassroots Impact Litigation: Mass Filing of Small Claims*, 26 U.S.F.L. Rev. 261 (1992).

HONORS & AWARDS

Best Lawyers in America®, Litigation -Securities, Seattle, Washington, 2024

Selected to Super Lawyers list in *Super Lawyers - Washington*, 2015-2024

Selected to Super Lawyers Top 50 Women list in *Super Lawyers - Washington*, 2020

Recipient of Promise of One Award from the Puget Sound Affiliate of Susan G. Komen for the Cure, 2013

Selected to Rising Stars list in *Super Lawyers - Washington*, 2000-2001

REPRESENTATIVE MATTERS

Andrews v. Plains All Am. Pipeline, L.P., No. 2:15-cv-04113 (C.D. Cal.)
In re Blackbaud, Inc., Customer Data Sec. Breach Litig., MDL No. 2972 (D.S.C.)
In re T-Mobile Customer Data Sec. Breach Litig., MDL No. 3019 (W.D. Mo.)
In re Nat'l Prescription Opiate Litig., MDL No. 2804 (N.D. Ohio)
Barbara Lewis, et al., v. Rodan & Fields, LLC, No. 4:18-cv-02248-PJH, (N.D. Cal.)
In re Insulin Pricing Litigation, No. 17-00699 (D. N.J.)
In re IKON Office Sols., Inc., 277 F.3d 658 (3rd Cir. 2002)
In re WorldCom, Inc. ERISA Litig., 354 F. Supp. 2d 423 (S.D.N.Y. 2005)
Hansen v. Ticket Track, Inc., 213 F.R.D. 412 (W.D. Wash. 2003)
In re Scientific-Atlanta, Inc. Sec. Litig., 239 F. Supp. 2d 1351 (N.D. Ga. 2002)
In re Domestic Air Transp. Antitrust Litig., 137 F.R.D. 677 (N.D. Ga. 1991)
In re Potash Antitrust Litig., 954 F. Supp. 1334 (D. Minn. 1997)



KEIL MUELLER

CONTACT INFO

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Portland OR 97204
(971) 253-4600
kmueller@kellerrohrback.com

PRACTICE EMPHASIS

- Class Action & Consumer Litigation
- Complex Litigation
- Environmental Litigation
- Governments & Municipalities
- Institutional Investors
- Securities

EDUCATION

New York University School of Law

J.D., *cum laude*, 2005

Williams College

B.A., Philosophy and Political Science, *magna cum laude*, 1999

Keil Mueller is a resolute and tireless advocate for his clients' interests.

With over 15 years of litigation experience, Keil has regularly represented government entities, investors, consumers, businesses and other Plaintiffs in a wide variety of complex legal matters and class actions. His practice focuses on issues related to securities and financial fraud, the environment, consumer class actions, and partner and shareholder disputes among others. Keil's thoughtful but tenacious pursuit of his clients' claims has contributed to significant courtroom victories and favorable settlements. He has successfully represented clients in matters of corporate malfeasance, taking on big companies such as AIG, Oppenheimer, FedEx Ground, JP Morgan Chase, and Bank of New York Mellon, just to name a few.

Currently, Keil is a key member of teams prosecuting claims on behalf of the State of Maryland, the State of Delaware, and the City of Seattle against multinational chemical manufacturer, Monsanto, and seeking to hold the corporate giant responsible for environmental contamination and other harms caused by Monsanto's sale and marketing of PCBs. Prior to joining Keller Rohrback, Keil also was a member of the team that represented the State of Oregon in similar claims against Monsanto, which Monsanto recently agreed to settle for \$698 million, the largest environmental settlement in Oregon's history.

In addition to advocating for his clients, Keil serves as a board member of the Campaign for Equal Justice and of the Oregon Lawyer Chapter of the American Constitution Society.

BAR & COURT ADMISSIONS

2008, Oregon State Bar

2006, New York

2008, U.S. District Court, Oregon

2006, U.S. District Court, Southern New York

2006, U.S. District Court, Eastern New York

2015, U.S. Court of Appeals, Ninth Circuit

PROFESSIONAL & CIVIC INVOLVEMENT

American Bar Association, *Member*

American Constitution Society, Oregon Lawyer Chapter,
Board Member, 2016-present (Chair, 2017-2018)

Multnomah Bar Association, *Member*

- CLE Committee, 2012-2015 (Co-Chair 2014-2015)
- Court Liaison Committee, 2010-2013 (Chair 2012-2013)
- Young Lawyers Section, Membership Committee, 2010-2012

Oregon State Bar, *Member*

Oregon Trial Lawyers Association, *Member*

- Business Litigation Section, Chair, 2015-2018

Public Investors Advocate Bar Association (PIABA), *Member*

Campaign for Equal Justice, *board member*, 2016-present
(*Secretary* 2022-present)

- Associates Committee, 2010-2016 (Co-Chair 2014-2016)

Community Cycling Center, *Board Member*, 2014-2020
(*Chair* 2017-2018)

HONORS & AWARDS

Benchmark Litigation, 2015-2025

Selected to Rising Stars list in *Super Lawyers - Oregon*, 2012-2016

Selected to Super Lawyers list in *Super Lawyers - Oregon*, 2020-2024

The Best Lawyers in America®, Portland, Oregon:

- Commercial Litigation, 2019-2024
- Litigation - Securities, 2021-2024
- Plaintiffs Mass Tort Litigation / Class Actions, 2022-2024

ARTICLES & PRESENTATIONS

"Little Green Men: Protest and Federal Repression in Portland," American Constitution Society Oregon, Portland, Oregon (August 2020), presenter

Oregon Civil Pleading and Litigation, "Answers, Affirmative Defenses, Counterclaims, and Replies," 2020 Edition

Trial Lawyers, "You Say Yes. I Say No. Ethical Issues in Multi-Plaintiff Settlements," 2015

Oregon Statutory Time Limitations, "Chapter 10: Business Litigation," 2013 & 2017 Revisions

Oregon Civil Pleading and Practice, "Chapter 43: Attorney Fees, Cost Bills, and ORCP 17 Sanctions," 2012 Revision

Oregon State Bar Litigation Journal, "Avoiding Removal and Dismissal Under the Securities Litigation Uniform Standards Act of 1998," 2010

PROFESSIONAL & CIVIC INVOLVEMENT

American Bar Association, *member*

American Constitution Society, Oregon Lawyer Chapter, board member, 2016-present (Chair, 2017-2018)

Multnomah Bar Association, *member*

- CLE Committee, 2012-2015 (Co-Chair 2014-2015)
- Court Liaison Committee, 2010-2013 (Chair 2012-2013)
- Young Lawyers Section, Membership Committee, 2010-2012

Oregon State Bar, *member*

Oregon Trial Lawyers Association, *member*

- Business Litigation Section, Chair, 2015-2018

Public Investors Advocate Bar Association (PIABA), *member*

Campaign for Equal Justice, *board member*, 2016-present (Secretary 2022-present)

- Associates Committee, 2010-2016 (Co-Chair 2014-2016)

Community Cycling Center, *board member*, 2014-2020 (Chair 2017-2018)

HONORS & AWARDS

Benchmark Litigation, 2015-2023

Selected to Rising Stars and Super Lawyers lists in Super Lawyers – Washington, 2012-2016 and 2020-2022

The Best Lawyers in America®, 2019-2023 Publications & Presentations

ARTICLES & PRESENTATIONS

Presenter, *Little Green Men: Protest and Federal Repression in Portland*, American Constitution Society Oregon, Portland, Oregon (August 2020).

Author, Oregon Civil Pleading and Litigation, *Answers, Affirmative Defenses, Counterclaims, and Replies*, 2020 Edition.

Author, *You Say Yes. I Say No. Ethical Issues in Multi-Plaintiff Settlements*, Trial Lawyers (2015).

Editor, *Chapter 10: Business Litigation*, Oregon Statutory Time Limitations, 2013 & 2017 Revisions.

Editor, *Chapter 43: Attorney Fees, Cost Bills, and ORCP 17 Sanctions*, Oregon Civil Pleading and Practice, 2012 Revision

Author, *Avoiding Removal and Dismissal Under the Securities Litigation Uniform Standards Act of 1998* Oregon State Bar Litigation Journal (2010).

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ERIC R. LALIBERTE

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PRACTICE EMPHASIS

- Real Estate Litigation
- Securities Litigation
- Commercial Litigation
- Trust & Estates Litigation

EDUCATION

Chapman University

B.A., Economics

Chapman University

M.B.A., Finance

University of Washington School of Law

J.D., 2012

Eric Laliberte meets sensitive issues with practical solutions. As the Chair of Keller Rohrback's Trust & Estates Litigation and Commercial Litigation teams, Eric's work is informed by multiple practice areas.

Eric graduated with his M.B.A. from Chapman University in 2009 and his J.D. from the University of Washington School of Law in 2012. His background in both finance and law provides him with the ability to understand complex financial issues and explain them in simple, straightforward ways. In addition to his clear communication skills, Eric also listens carefully to his clients' needs and tailors his strategy to meet them. Whether a matter requires alternate forms of dispute resolution or a fiercely litigated battle, Eric is equipped to handle it.

In addition to his legal work, Eric also serves on the Lake Washington School District Board of Directors. In his free time, he enjoys spending time with his family and teaching soccer to his son.

BAR & COURT ADMISSIONS

2012, Washington

2012, U.S. District Court for the Western District of Washington

PROFESSIONAL & CIVIC INVOLVEMENT

Federal Bar Association, *Member*

Washington State Bar Association, *Member*

American Bar Association, *Member*

Lake Washington School District Board of Directors, *District One Director*

HONORS & AWARDS

The Best Lawyers in America®, Commercial Litigation, Seattle, Washington, 2025 (Recognized since 2024)

Named to Rising Stars list in Super Lawyers - Washington, 2020-2022



CHRIS RYDER

CONTACT INFO

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PRACTICE EMPHASIS

- Class Actions
- Commercial Litigation
- Consumer & Data Privacy Protection

EDUCATION

Washington State University
B.A., Communication, 2017 *magna cum laude*

Gonzaga University School of Law

J.D., 2021, *magna cum laude*

Chris Ryder knows that effective communication is key to building a persuasive and coherent legal argument.

Long interested in politics and the idea of creating positive social change, Chris views the legal tools of class actions and mass torts as effective ways to proactively correct corporate wrongdoings and help a large number of people in ways that might otherwise be unfeasible. With a particular interest in the new frontier of digital and online issues, Chris is well suited to Keller Rohrbach's consumer and data privacy protection practice and other complex litigation teams.

The seeds of a legal career were first planted for Chris in 2016 while working as an undergraduate communications intern for a non-profit in Washington D.C. and interacting with their robust legal department. From there, Chris attended and received his J.D. from Gonzaga University School of Law, graduating magna cum laude in 2021, where he acted as the Managing Editor of the Gonzaga Law Review. After graduating from law school, Chris clerked for the Honorable Justice Susan Owens of the Washington State Supreme Court.

In his personal life, Chris enjoys playing and watching chess, reading Kurt Vonnegut novels, exploring national parks with his wife, and playing saxophone.

BAR & COURT ADMISSIONS

2021, Washington

2023, Western District of Washington

2023, Second Circuit Court of Appeals

HONORS & AWARDS

Selected to Rising Stars list in *Super Lawyers - Washington*, 2024

KELLER ROHRBACK

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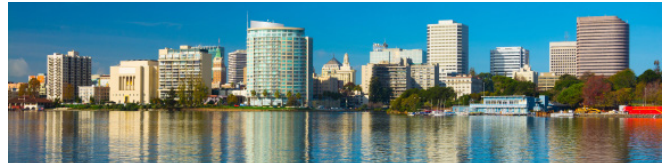
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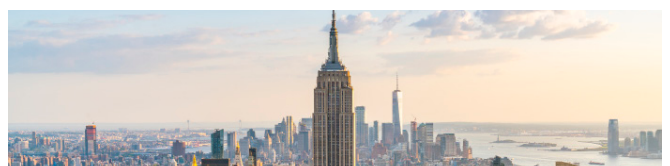
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NORJMoo BATTULGA

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PRACTICE EMPHASIS

- Class Action and Consumer Litigation
- Appeals

EDUCATION

Metropolitan State University of Denver,
B.A., Journalism, magna cum laude, 2017

Golden Gate University School of Law,
J.D., magna cum laude, 2020

Norjmoo Battulga is energized and inspired by the law as a creative learning exercise each and every day that she practices.

Norjmoo arrived in the United States at the age of five and grew up with her parents and sister in Denver, Colorado. Serving as interpreters for their parents, the sisters realized that despite their proficiency in the new language, there was still a lot to learn about the systems, regulations and rules that “we didn’t have the privilege of knowing about.” For Norjmoo, this led to interest in a profession that would help her grasp the nuances of government, business, and the legal system. She decided early on that the law was one of the few fields where continuous learning and novelty is one of its distinguishing features.

She earned a B.A. in Journalism at Metropolitan State University of Denver, and earned her J.D. from Golden Gate University School of Law, magna cum laude in 2020. She served as an intern for the ACLU’s Immigrant’s Rights Project, as a judicial extern for the Ninth Circuit Court of Appeals Office of the Staff Attorneys, and as a judicial extern for the Honorable Brad Seligman of the Alameda County Superior Court.

Following law school, Norjmoo spent a year working for the LGBT Asylum Project, as part of the inaugural cohort of Legal Services Funders Network’s fellows in the San Francisco Bay Area. In that role, she assisted clients applying for asylum and Deferred Action for Childhood Arrivals (DACA) status. She moved on from that post to clerk for a pair of judges in the Oregon Court of Appeals, the Hon. James C. Egan and the Hon. Roger J. DeHoog. The appellate experience she acquired in those chambers aligned with her fundamental attraction to research and writing.

Away from work, Norjmoo takes full advantage of all the Pacific Northwest has to offer, whether camping, hiking, paddle-boarding, climbing, or romping with her two dogs. She looks forward to crafting a positive work-life balance as her future unfolds at Keller Rohrbach.

BAR & COURT ADMISSIONS

2021, California
2024, Oregon

KELLER ROHRBACK

LAW OFFICES ♦ L. L. P.



ERIC FIERRO

CONTACT INFO

3101 N Central Avenue, Ste. 1400
Phoenix, AZ 85012
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efierro@kellerrohrback.com

PRACTICE EMPHASIS

- Class Actions
- Commercial Litigation
- Consumer Protection
- eDiscovery
- Financial Products and Services
- Intellectual Property
- Mass Personal Injury
- Securities
- Whistleblower

EDUCATION

Arizona State University

B.S., 2002, Justice Studies

New England School of Law

J.D., 2006, Senior Editor, *New England Journal of International and Comparative Law*

Eric Fierro bridges the gap between technology and the law. Eric practices in Keller Rohrback's nationally recognized Complex Litigation Group and oversees the firm's legal technology group, providing electronic discovery and litigation support to colleagues and clients on a wide array of cases. Whether he is helping to preserve significant amounts of data for institutional clients or walking an individual through the data collection process to increase accuracy and maximize privacy, Eric works closely with clients to understand their needs and provide solutions.

Eric has over 15 years of experience with legal technology. While attending law school in the evening, Eric worked full-time for the U.S. Attorney's Office for the District of Massachusetts where he provided technical support for all criminal and civil units, including the healthcare fraud, securities fraud, and other white collar crime units. Eric also worked as a summer law clerk for the computer crime and intellectual property unit at the U.S. Attorney's Office. Before joining Keller Rohrback, he was a managing consultant for Huron Consulting Group, providing consultative services for complex electronic discovery and document review matters.

When not at work, Eric enjoys spending time with his family, golfing, and rebuilding off-road vehicles in his garage.

BAR & COURT ADMISSIONS

2009, Arizona

2009, U.S. District Court for the District of Arizona

PROFESSIONAL & CIVIC INVOLVEMENT

Arizona State Bar Association, *Member*

PUBLICATIONS & PRESENTATIONS

Presenter, *Everyday Devices and the Internet of Things: Working with ESI in the Forest of Smart Device*, ASU-Arkfeld eDiscovery and Digital Evidence Conference (2019).

Presenter, *Plaintiff Offensive Review Workflows and Tips*, 2018 Complex Litigation E-Discovery Forum, (September 2018).

Presenter, *Best Practice for Plaintiff Document Collection*, 2017 Complex Litigation E-Discovery Forum (September 2017).

Presenter, *Negotiating a State of the Art ESI Protocol*, 2016 Complex Litigation E-Discovery Forum, (September 23, 2016).

Panelist, *The 2015 Federal Rule Amendments: Has Anything Really Changed?*, IPro Innovations for The Sedona Conference (April 2016).

Speaker, *Cloud Computing: In Your Practice and in Litigation*, Arizona Paralegal Association (2009).

Speaker, *E-Discovery Problem Solving for Paralegals*, National Business Institute (2008).